

# SUMMONS

Meeting: Council

Place: Council Chamber - County Hall, Bythesea Road, Trowbridge, BA14

8JN

Date: Tuesday 25 February 2025

Time: 10.30 am

All Members are summoned to attend a meeting of the Council at the time, location and date listed above.

Members are reminded to sign the attendance sheet before entering the Council Chamber, and if leaving before the closing of the meeting.

Please direct any enquiries on this Agenda to Kieran Elliott of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email <a href="mailto:committee@wiltshire.gov.uk">committee@wiltshire.gov.uk</a>

Press enquiries to Communications on direct lines 01225 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at <a href="https://www.wiltshire.gov.uk">www.wiltshire.gov.uk</a>



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## **Public Participation**

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult <u>Part 4 of the council's constitution</u>. The full constitution can be found at this link.

For assistance on these and other matters please contact <a href="committee@wiltshire.gov.uk">committee@wiltshire.gov.uk</a> for details.

#### **PARTI**

Items to be considered while the meeting is open to the public

## 1 Apologies

To receive any apologies for absence.

# 2 Minutes of Previous Meeting (Pages 7 - 60)

To approve as a true and correct record and sign the minutes of the ordinary meeting of Council held on 15 October 2024 and the extraordinary meeting of Council held on 9 January 2025.

## 3 **Declarations of Interest**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee or Monitoring Officer.

#### 4 Chairman's Announcements

To receive any announcements through the Chairman.

## 5 **Petitions** (Pages 61 - 64)

- a) To receive presentation of any petitions submitted for the meeting
- b) To receive an update on any petitions received by the council since the last meeting.

#### 6 **Public Participation**

The Council welcomes contributions from members of the public.

#### Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Members of the public are encouraged to register to speak earlier.

Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item. Statements must be relevant to the agenda item.

#### Questions

To receive any questions from members of the public received in accordance with the constitution. No person or organisation may submit more than two questions to the meeting. No question may be sub-divided into more than two related parts.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named above (acting on behalf of the Proper Officer) no later than 5pm on 18 February 2025 in order to be guaranteed of a written response. Questions submitted no later than 5pm on 20 February 2025 may receive a verbal response. Questions may be asked without notice if the

Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Members prior to the meeting and made available at the meeting and on the Council's website.

Please contact the officer named on the first page of this agenda for further advice.

#### BUDGET

7 Treasury Management Strategy Statement 2025/26 (Pages 65 - 104)

To receive a report from the Chief Executive and the S.151 Officer.

8 Wiltshire Council Budget 2025/26 and MTFS Update 2025/26-2027/28 (Pages 105 - 304)

To receive a report from the Chief Executive, Monitoring Officer, and the S.151 Officer:

- a) Budget Addendum (Pages 105 108)
- b) Budget 2025/26 and Medium Term Financial Strategy 2025/26-2027/28 Report and Appendices (*Pages 109 284*)
- c) Extract of the minutes of the meeting of Cabinet held on 4 February 2025. (Pages 285 288)
- d) Notes from the budget briefings with Trade Union representatives, and representatives of non-domestic ratepayers (Pages 289 292)
- e) Report of the Overview and Scrutiny Management Committee meeting held on 28 January 2025 consideration of the draft Budget. (*Pages 293 300*)
- f) Proposed amendments to the budget
  - i. Amendment A Cllr Jon Hubbard Free Swimming (Pages 301 302)
  - ii. Amendment B Cllr Jon Hubbard Reablement Services (Pages 303 304)
- g) Report of the Overview and Scrutiny Management Committee meeting held on 13 February 2025 consideration of draft Budget Amendments (to follow)
- 9 Housing Revenue Account (HRA) Budget Setting 2025/26 including Dwelling Rent Setting 2025/26 and 30-Year Business Plan Review (Pages 305 336)

To receive a report from the Director of Assets and the S.151 Officer.

10 **Council Tax Setting 2025/26** (Pages 337 - 360)

To receive a report from the Chief Executive and the S.151 Officer.

11 **Pay Policy Statement 2025/26** (Pages 361 - 380)

To receive a report from the Chief Executive.

#### POLICY FRAMEWORK

12 Gypsy and Traveller Site Development Plan Document (Pages 381 - 794)

To receive a report from the Corporate Director - Place.

#### MOTIONS FROM MEMBERS OF THE COUNCIL

Notice of Motion No.2025-01: Action against the removal of Labour's "Family Farm Tax" (Pages 795 - 796)

To consider the attached motion from Cllrs Rich Rogers and Bill Parks.

Notice of Motion No.2025-02: Restoration of Councillor's Right to Ask Unnotified Questions at the Beginning of Cabinet Meetings (Pages 797 - 798)

To consider the attached motion from Cllrs Jon Hubbard and Ian Thorn.

Notice of Motion No. 2025-03: Motion to amend appointment of Portfolio Holders to be approved by Full Council (Pages 799 - 800)

To consider the attached motion from Cllrs Edward Kirk and Mike Sankey.

Notice of Motion No.2025-04: Existing Employment Sites (Pages 801 - 802)

To consider the attached motion from Cllrs Philip Whitehead and Simon Jacobs.

#### OTHER ITEMS OF BUSINESS

- 17 **Updates from Cabinet and Committees** (Pages 803 806)
  - a) To receive any other appropriate announcements from the Leader, Cabinet Members, or Chairs of Committees.
  - b) To receive updates in relation to Council Notices of Motion.
  - c) To note that the following Executive decisions were exempted from call-in procedures in accordance with Part 8 of the Constitution:

L-01-25: Submission to the Devolution Priority Programme
FDMSP-04-24: Inter-Authority Agreement with Partnership for South
Hampshire

18 **Designation of Statutory Roles** (Pages 807 - 812)

To receive a report from the Director HR & OD.

- 19 Membership of Committees
  - a) To determine any requests from Group Leaders for changes to committee membership in accordance with the allocation of seats to political groups previously approved by the Council.

- b) To ratify the appointment of the Chairman of the Local Pension Board.
- c) To consider any requests from Members in respect of S.85 of the Local Government Act 1972.

#### 20 Questions from Members of the Council

Members were required to give notice of any questions in writing to the Proper Officer on the first page of this agenda no later than 5pm nine clear working days before the meeting in order to be guaranteed a written response.

Any question received after 5pm on 11 February 2025 and no later than 5pm on 18 February 2025, may only receive a verbal response at the meeting. Any questions received after this date will be received at the next meeting.

Questions may be asked without notice if the Chairman determines the matter is urgent.

Details of any questions received will be circulated to Members prior to the meeting and made available at the meeting and on the Council's website.

#### **PART II**

Items during consideration of which it is recommended that the public should be excluded because of the likelihood that exempt information would be disclosed.

None

Lucy Townsend Chief Executive Wiltshire Council Bythesea Road Trowbridge Wiltshire BA14 8JN



# Council

MINUTES OF THE COUNCIL MEETING HELD ON 15 OCTOBER 2024 AT COUNCIL CHAMBER - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### Present:

Cllr Bridget Wayman (Chairman), Cllr Christopher Newbury (Vice-Chairman), Cllr Phil Alford, Cllr Liz Alstrom, Cllr lan Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Dr Monica Devendran, Cllr Nick Dye, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Clir Peter Hutton, Clir Tony Jackson, Clir Mel Jacob, Clir George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Kathryn Macdermid, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Dr Nick Murry, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Jack Oatley, Cllr Andrew Oliver, Cllr Ashley O'Neill, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Tony Pickernell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Tom Rounds, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas. Cllr lan Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr lain Wallis, Cllr Derek Walters, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill

# 56 **Apologies**

Apologies for absence were received from Councillors Helen Belcher OBE, Chuck Berry, Allison Bucknell, Steve Bucknell, Sarah Gibson MP, Howard Greenman, Simon Jacobs, Edward Kirk, Ian McLennan, Paul Oatway QPM, Bill Parks, Antonio Piazza and Richard Rogers.

In addition, it was noted that Cllr lan Thorn would not be present during the morning session due to a personal matter, and Cllr Gordon King would be deputising on behalf of the Liberal Democrat Group.

# 57 <u>Minutes of Previous Meeting</u>

The minutes of the meeting held on 24 July 2024 were presented for consideration. On the proposal of the Chairman, seconded by the Vice-Chairman, it was:

#### Resolved:

To approve and sign the minutes as a true and correct record.

## 58 **Declarations of Interest**

There were no declarations of interest.

# 59 **Chairman's Announcements**

Through the Chair there were the following announcements:

## a) Chairman's Engagements

A list of engagements attended by the Chairman since 24 July 2024 were detailed as set out below:

- 3 September 2024 Merchant Navy Day flag raising ceremony, County Hall, Trowbridge
- 22 September 2024 Wiltshire Campaign for the Protection of Rural England Best Kept Village Competition presentation day. Winning plaques were presented to Upper Seagry (medium village award), Hankerton (small village award), Ashton Keynes (large village award), and Urchfont (Laurence Kitching 'winner of winners' award).

#### b) Medals

The following Wiltshire and Swindon resident received a medal during this period:

 Lisa Hall, Coronation Medal (for direct contribution to Coronation on 6 May 2023), Scouts, North Swindon

#### c) Staff Announcements

The Chairman noted that since the previous meeting Lucy Townsend had formally begun her role as Chief Executive on 16 August 2024 and wished her every success in her new position.

The Chairman also updated Council about other changes to the council's Extended Leadership Team since the last meeting, following meetings of the Officer Appointments Committee.

Darryl Freeman had been appointed as Interim Corporate Director, Children and Education, and Florah Shiringo had been appointed as the Interim Director, Families and Children.

The Chairman further placed on record her thanks and best wishes to Andy Brown, Deputy Chief Executive and Corporate Director, Resources, who had accepted the post of Deputy Chief Executive and Executive Director, Finance

and Corporate Services (Section 151 Officer), at Surrey County Council. On behalf of the Council the Chairman expressed gratitude for his work and wished him every success in his new role, which he started on 14 October 2024.

## c) Deaths

It was noted that former MP for the Devizes Constituency known as Michael Ancram had passed away on 1 October 2024. He was MP for the constituency from 1992 to 2010. The Chairman had sent the council's condolences go to his friends and family.

#### d) Agenda

The Chairman explained that the Motion 24-09 had been withdrawn by the mover and seconder, so would not be considered at the meeting.

# 60 **Petitions**

An updated report set out in Agenda Supplement 2 was presented which gave Council details of the seven petitions received since the last meeting of the council, together with the response which had been provided.

On the proposal of the Chairman, seconded by the Vice-Chairman, it was:

## Resolved:

That Council notes the update on petitions as detailed in Agenda Supplement 2.

#### 61 **Public Participation**

The Chairman explained the procedure that would be followed for public participation at the meeting in accordance with the constitution.

Details of six questions submitted and the responses to them were set out in Agenda Supplement 2.

Questions which did not relate to an agenda item were received under this item.

Question P24-28 – Colin Gale (Chairman of Rushall Parish Council)

A supplementary question was asked by Mr Gale about whether the drain head could be rebuilt as soon as possible on Devizes Road, Rushall.

Cllr Nick Holder, Cabinet Member for Highways, Street Scene and Flooding, responded that he would discuss the issue further with officers and that a written response would be provided in due course.

## Question P24-28 – Colin Gale (Chairman of Rushall Parish Council)

Mr Gale asked a supplementary question about whether full clearance of the drainage ditch for Rushall Bridge could be programmed quickly given the wet weather conditions expected in the coming months.

Cllr Holder explained that the instruction to clear the ditch had been issued and it would be programmed in due course. He would speak to officers to find out further information and contact Mr Gale with a date when the works could take place.

## 62 Annual Update on the Council's Response to the Climate Emergency

The Chairman called upon Cllr Dominic Muns, Cabinet Member for Waste and Environment, to introduce the annual update on the council's response to the climate emergency. He moved the recommendations included within the report, which were seconded by Cllr Richard Clewer, Leader of the Council.

Cllr Muns reported that significant progress was being made against all the climate strategy delivery themes. The council was on track to meet its objective of being carbon neutral, in its direct emissions, by 2030. He explained that the council's Climate Delivery Strategy Plan and Carbon Neutral Council Plan would be fully updated by the end of the year to set out the priorities for 2025 and beyond. He noted that Wiltshire Council directly controlled around 0.2 percent of Wiltshire's emissions, and was increasing support to residents and businesses to help them reach net zero. He gave thanks to officers for their hard work in driving forward the plans and highlighted that a full list of the achievements would be included in the delivery plan presented at the end of the year.

Group Leaders were then given the opportunity to comment. Cllr Richard Clewer, Leader of the Council, reiterated the progress that was being made towards reducing the council's direct emissions and stated that he would welcome a faster reduction in emissions across the county as a whole. He emphasised that he was continuing to lobby hard through UK 100, the Countryside Climate Network, and the County Council Network to ensure that the views of rural communities were represented to national policymakers. He welcomed that there were not currently any air quality exceedances in the county and that there had been an increase in the rate of tree planting.

Cllr Gordon King, Deputy Leader of the Liberal Democrat Group, stated that he agreed with the importance of reducing emissions. He recognised that setting wide ranging objectives within a set timeframe was a large undertaking and that some slippages would be inevitable. He was pleased that the work to reduce the council's direct emissions was largely on track and commended the work that had taken place.

Cllr Ricky Rogers, Leader of the Labour Group, stated that he was broadly in support of the direction of travel and gave thanks to officers for the tremendous work that they were doing.

Cllr Graham Wright, the Chairman of Climate Emergency Task Group, also took the opportunity to praise officers. He explained that the task group had met the previous week and would meet again the following week, continuing its ongoing work to explore and assess work taking place.

The Chairman then opened the item for general debate.

There was praise for the efforts made by Wiltshire Council in reducing its direct emissions, including within its Highways department. However, some members expressed frustration that there had not been greater progress in reducing indirect emissions, including from outsourced contracts and burning waste. It was claimed that a recent report had estimated that 30 percent of emission reductions nationwide required intervention from local authorities, and that local authorities could influence up to 82 percent of emissions.

Other areas discussed included the importance of healthy rivers and the efforts being made to reduce transport emissions. It was noted that the Wiltshire Connect on demand bus service in Pewsey Vale had improved uptake in public transport. There were plans to extend the scheme towards Malmesbury and Mere, which would also help to drive down overall emissions.

At the conclusion of the discussion, Cllr Muns welcomed the comments made about the reduction in the council's direct emissions. In response to some of the concerns raised about indirect emissions, he noted that Wiltshire Council was extracting information about the environmental impact of its suppliers, so it could consider this data as part of contract negotiations. Evidence of this was that Milestone and Wiltshire Council had been shortlisted for the Edie Net Zero Awards in the category of supply chain decarbonisation. He also felt that generating energy from some waste was a pragmatic step that was more beneficial than landfill. He emphasised the importance of public opinion in reducing emissions and boosting recycling.

It was then,

## Resolved:

That Full Council notes the actions taken in response to the climate emergency following the last update in October 2023, including the council's annual Greenhouse Gas Report, the KPI scorecard, and the direction of travel for 2025.

## 63 Wiltshire Local Plan Review - Submission of Draft Plan

The Chairman called upon Cllr Nick Botterill, Cabinet Member for Finance, Development Management and Strategic Planning, to introduce the report. Cllr Botterill moved the motion set out in the report, which was seconded by Cllr Richard Clewer, Leader of the Council.

Cllr Botterill gave an overview of the complex processes, including formal consultation processes, that had taken place ahead of production of the the

draft Local Plan, explaining that over 10,000 responses had been received and considered. He outlined some of his concerns about national changes to the way that housing need was calculated, which he felt had seen a shift in the prioritisation of development from cities to rural areas. He reported that Wiltshire was expected to deliver 3,476 new homes per year under these changes, an 81 percent increase on the previous target of 1,911.

Cllr Botterill reported that the draft Local Plan presented was realistic and sound. He outlined some of the key principles within it, including achieving high environmental standards, delivering affordable housing, and a brownfield site first approach. He urged Council to recommend that the draft Local Plan be submitted to the Inspector, as it would mean that Wiltshire would benefit from transitional arrangements set out in the government's consultation on the changes to the National Planning Policy Framework (NPPF). This would allow the housing numbers that underpinned the draft Local Plan to be used going forward, although a new draft Local Plan would have to be developed in the longer term to meet the government's revised targets.

Public statements were then received from Andrew Nicolson, Wiltshire Climate Alliance, and Adrian Temple Brown.

Group Leaders were then given the opportunity to comment.

Cllr Richard Clewer, Leader of the Council, endorsed Cllr Botterill's view that the draft Local Plan should be sent to the Inspector. He commended the plan, explaining that new housing would be built to net zero standards and would achieve a 20 percent biodiversity net gain. Other benefits of the draft Local Plan were that it would improve the council's control over what, and how, development was built, by giving it a six-year housing land supply. It would also deliver military and affordable housing. He criticised attempts in Full Council to delay progression of the draft Local Plan to its Reg 19 consultation in 2023.

Cllr Gordon King, Deputy Leader of the Liberal Democrats Group, thanked officers for providing a briefing about the proposals. He noted that he regretted that an amendment put forward by the Liberal Democrat Group, in July 2023, to undertake a further Reg 18 consultation had been defeated.

Cllr Ernie Clark, Leader of the Independent Group, agreed that the draft Local Plan should be submitted to the Inspector and felt that there had been sufficient opportunity for people to put their views forward. He observed that local plans were always contentious and that some parish councils would likely take the plan to judicial review.

Cllr Ricky Rogers, Leader of the Labour Group, highlighted his disappointment that an amendment proposed by Cllr lan McLennan had been rejected and so would not be moved at the meeting, but noted that he respected the decision. He reiterated that the Labour Group had concerns about Core Policy 30 (Land East of Church Road, Laverstock) in the draft Local Plan and the protection that it offered to small villages. However, he felt that it was important for the Local

Plan to be updated, and he called for greater progress towards developing the engine sheds site in Salisbury.

The Chairman noted that the issue raised by Cllr McLennan needed to be raised with the Inspector.

The item was then opened to general debate by the Chairman.

There were numerous comments criticising the increase in the government's housing targets for Wiltshire and stressing the importance of having an up-to-date Local Plan to ensure that decisions were not forced upon communities. Several members raised specific concerns about the housing allocation in their divisions. A member expressed regret that a site that had not been listed when the draft Local Plan went out for Reg 18 consultation had been added by the time of the Reg 19 consultation. Frustrations were also expressed that Wiltshire was currently unable to demonstrate a five-year housing land supply and that, in their view, the appropriate infrastructure was not in place to support the level of development required by central government. There was also a comment that the draft would likely not be approved due to the increased requirements imposed by central government.

A number of the new policies in the draft Local Plan were welcomed. Some of the updated policies were singled out for praise, including Core Policy 87 (Embodied Carbon) for helping to reduce emissions, Core Policy 96 (Water Resources), for protecting water supplies, and Core Policy 65 (Existing Employment Land) for protecting local businesses. Another suggest was that the wording of some core policies could be strengthened to provide greater protection, including Core Policy 92 (Conserving and Enhancing Dark Skies). Evidence of recently approved housing developments failing to comply with national space standard requirements was requested to be published.

Following concerns raised about the highway infrastructure available to support development near the Harnham area of Salisbury, Cllr Nick Holder, Cabinet Member Highways Street Scene and Flooding said that he would ask officers to provide information about the A338 Salisbury Junction to Salisbury Area Board.

At the conclusion of the debate, Cllr Botterill welcomed the support for submitting the draft Local Plan to the Inspector. He stated that as long as the draft Local Plan was submitted for inspection within a month of the government's responses to the NPPF, it could be assessed under existing policy arrangements. He also clarified that there would be an opportunity for residents to have a further say if the draft Local Plan was submitted to the Inspector. He then advised that the query about space standards should be raised with officers.

He also took the opportunity to respond to some of the local issues raised by members about their divisions. He acknowledged the challenges associated with clearing contamination on the brownfield site at the engine shed in Salisbury and stated his desire to move the project forward. He noted that there

were complexities in securing developer funding for a new railway bridge in Westbury but that they were still looking at ways which it could be delivered.

Cllr Botterill emphasised that it did not appear there was sufficient interest from developers, or enough tradespeople, to deliver 3,500 homes per year in the county.

At the conclusion of the debate, it was:

#### Resolved:

That Full Council, having considered the response from the formal consultation:

- 1) Approves the submission of the Wiltshire Local Plan Review, Presubmission Draft Plan at Appendix 1 to the Secretary of State for Housing, Communities and Local Government for independent examination together with relevant associated documentation;
- 2) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended); and
- 3) Authorises the Director of Planning to take or authorise such steps as may be necessary for the independent examination of the Plan to be completed, including:
  - a)Make appropriate arrangements for submission of the Plan and the completion and submission of all documents relating to the Plan;
  - b)Make all necessary arrangements for examination including the c)appointment of a Programme Officer: the undertaking and/or
  - c)appointment of a Programme Officer; the undertaking and/or d)commissioning of other work necessary to prepare for and
  - participate at examination; proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map; entering into Memorandums of Understanding and Statements of Common Ground; and the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and
  - e)Implement any consequential actions relating to the examination,
  - f) including undertaking any consultation that may be necessary, and publishing the recommendations and reasons of the person appointed to carry out the examination.

In accordance with the constitution there was a recorded vote.

Votes for the motion (80)

Votes against the motion (1) Votes in abstention (1)

Details of the vote are attached as an appendix to the minutes.

# 64 **Enforcement Policy**

The Chairman called upon Cllr Richard Clewer, Leader of the Council, to introduce the item. Cllr Clewer moved that the Enforcement Policy be adopted, which was seconded by Cllr Laura Mayes, Deputy Leader of the Council.

Cllr Clewer spoke in support of the motion, explaining that enforcement was vital in preventing harm to people and the environment. It also ensured that there was a level playing field in the planning system. He argued that the policy would be a good way of bringing all the council's enforcement policies together to ensure a joined-up approach. He noted that complex enforcement situations often required enforcement in a number of different areas and was pleased to report that fly tipping was down by 40 percent.

Other Group Leaders then had the opportunity to comment.

Cllr Graham Wright, Chairman of the Overview and Scrutiny Management Committee, praised the new policy and urged Council to adopt it.

The item was then opened to wider discussion and debate by the Chairman.

A number of comments were made in support of the motion. Praise was given for the partnership work between agencies, such as the Canal and River Trust. The increase in resources for the Enforcement Management Group and reduction in fly tipping were also welcomed.

A number of members emphasised the need to make sure that policies were enforced in a proportionate 'common sense' manner, for example when people left second hand items outside of their homes. Other issues discussed included the balance between protecting civil liberties and ensuring strong financial penalties for those breeching policies.

One member stressed the importance of ensuring that projects, due to be implemented by Wiltshire Council using S106 funding, were delivered in a timely manner, so that the council was setting a good example to other agencies.

Cllr Clewer than had the opportunity to respond to the points raised. He welcomed the support for the proposals and reassured Council that the need for proportionately was referenced throughout the Enforcement Policy. He noted that £0.800m had been invested into resourcing enforcement and reiterated that the policy would help to prevent harm to people and the environment.

At the conclusion of the debate, it was then,

#### Resolved:

## That Full Council adopt the Enforcement Policy as set out at Appendix 1.

In accordance with the constitution there was a recorded vote.

Votes for the motion (83) Votes against the motion (0) Votes in abstention (0)

Details of the vote are attached as an appendix to the minutes.

## 65 Statement of Licensing Policy

The Chairman called upon Cllr Dominic Muns, Cabinet Member with responsibility for Licensing, to introduce the item. Cllr Muns moved the proposals, which were seconded by Cllr Peter Hutton.

Cllr Muns explained that Wiltshire Council had a statutory duty to review its Licensing Policy every five years and that there were approximately 2,000 licensed premises in Wiltshire that were covered by the policy. He confirmed that a public consultation, that had taken place between April and May 2024, had received 35 responses, most of which related to Temporary Event Notices. He explained that there were no substantial changes to the policy although, some of the wording relating to Temprary Event Notices had been revised to reflect the feedback. Cllr Muns took the opportunity to thank the public that had participated in the consultation as well as officers for their work on the revised draft. He also thanked the Licensing Committee for scrutinising the draft policy and for recommending its adoption by Council.

Group Leaders then had the opportunity to comment on the motion.

The Chairman then opened the item for general debate.

Cllr Hutton, Chairman of the Licensing Committee, reassured Council that they held a number of licensing sub-committees throughout the year to ensure that the four licensing objectives were upheld. He reported that he had asked officers to ensure that a comprehensive training package was in place for new members joining after the elections in May 2025.

There being no further comments in debate or summation, it was then,

#### Resolved:

That Full Council approved the Statement of Licensing Policy (2024-2029) (Appendix 1) under the Licensing Act 2003 which will come into effect from 1 November 2024.

In accordance with the constitution there was a recorded vote.

Votes for the motion (80) Votes against the motion (0) Votes in abstention (1)

Details of the vote are attached as an appendix to the minutes.

# 66 Statement of Gambling Principles

The Chairman invited Cllr Dominic Muns, the Cabinet Member with responsibility for gambling policy, to introduce the report. Cllr Muns moved that the statement of gambling principles be adopted, which was seconded by Cllr Peter Hutton.

Cllr Muns explained that local authorities had a statutory obligation to review their statement of gambling principles every three years. He highlighted that the statement did not apply to online gambling. However, small lotteries, betting shops, adult gaming centres and family entertainment centres would be covered by the policy. A consultation had been held in July and August, with 14 comments received. All the comments had been reviewed and the feedback added to the updated policy, but there had not been no substantial changes.

Group Leaders then had the opportunity to comment on the statement.

The Chairman then opened the item to wider debate.

The Chairman of the Licensing Committee, Cllr Hutton, reported that Wiltshire Council did send out communications highlighting the dangers of excessive online gambling. Even though online gambling was not technically a responsibility of Wiltshire Council they did see it as part of their duty of care to residents.

There being no further comments in debate or summation, it was then,

#### Resolved:

That Full Council approves the Gambling Statement of Principles (2025-2027) (Appendix 1) under the Gambling Act 2005 which will come into effect from 1 January 2025.

In accordance with the constitution there was a recorded vote.

Votes for the motion (77) Votes against the motion (0) Votes in abstention (0)

Details of the vote are attached as an appendix to the minutes.

# 67 <u>Senior Management Structure - Changes and Designation of the statutory</u> function of Director of Children's Services (DCS)

The Chairman invited Cllr Ashley O'Neill, Cabinet Member for Governance, IT, Broadband, Digital and Staffing, to introduce a report regarding the designation of statutory roles following changes to the senior management structure at the council. He moved the recommendations as set out in the agenda, which were seconded by Cllr Richard Clewer, Leader of the Council.

Cllr O'Neill noted that the appointment of the new Chief Executive, Lucy Townsend, had created a vacancy in the role of Corporate Director, People. An interim appointment was made for a Corporate Director for Children and Education to partially replace the role of Corporate Director People. He explained that the Chief Executive had used emergency powers to designate the statutory role of Director of Children's Services to that role and was also intending to appoint a Corporate Director for Care and Wellbeing. He asked that Council agree to abolish the role of Corporate Director, People, approve the new role of Corporate Director for Care and Wellbeing and to note the creation of the new Corporate Director for Children and Education post. The Corporate Director Resources would also lose the designation of Deputy Chief Executive.

He reported that the Chief Executive felt that the changes would increase the ability of the council to deliver preventative measures and improve outcomes for residents. The budgetary implications of the change in roles was outlined.

Group Leaders then had the opportunity to comment on the proposals.

Cllr Richard Clewer, Leader of the Council, stated that the saw the creation of the additional post as a sensible move given the high proportion of the council's budget that was spent on caring for vulnerable adults. Given that resources supported the delivery of other services he also felt it was appropriate for this to be a corporate director role. He explained that the management structure was a matter for the Chief Executive but was done in close consultation with political leaders at the council.

Cllr Gordon King, Deputy Leader of the Liberal Democrat Group, endorsed the changes, which he felt reflected the priorities of the council.

The Chairman then opened the item for debate. There being no comments received, it was then,

#### Resolved

That Council:

- 1) Approves the deletion of the post of Corporate Director People;
- 2) Approves the creation of the new post of Corporate Director Care & Wellbeing;

- Note and ratify the designation of statutory role of Director of Children's Services (DCS) to the new position of Corporate Director, Children and Education;
- 4) Note that other designated statutory roles are unchanged as a result of the restructure and remain with existing posts:
  - a) Head of Paid Service, Returning Officer (RO) and Electoral Registration Officer (ERO) with the post of Chief Executive
  - b) Section 151 with the post of Director Finance and Procurement
  - c) Director of Adult Services (DASS) with the post of Director –
     Adult Social Care
  - d) Director of Public Health (DPH) with the post of Director Public Health
  - e) Monitoring Officer with the post of Director Legal and Governance

The Chairman adjourned the meeting at approximately 12:50pm until 1.30pm.

# 68 <u>Motion No. 2024-05 - Winter Fuel Payments</u>

The meeting reconvened at approximately 1:35pm.

On invitation of the Chairman, Cllr Elizabeth Threlfall proposed the motion as set out in the agenda, which was seconded by Cllr Pauline Church.

Cllr Threlfall introduced the motion by speaking in objection to the government's decision to end winter fuel payments for pensioners not in receipt of pension credit. She described the decision as precipitous and stated that it would force many people to choose between eating and heating. She provided statistical information in support of the view that the decision could impact many pensioners near the poverty line and even lead to excess deaths.

It was stated a large proportion of the 160k pensions living in Wiltshire would face an income reduction for the coming winter and noted that Wiltshire has a higher proportion of pensioners than the national average, with many eligible but not currently in receipt of pension credits. A contrast was made with the decision to end the winter fuel payment for many less well-off pensioners, whilst simultaneously committing to award pay rises to workers on what could be considered comfortable salaries. Cllr Threlfall argued that it was essential that Wiltshire Council signposted pensioners to where they could get help and encouraged Council to support the motion requesting the Chancellor of the Exchequer review the decision.

Cllr Richard Clewer, Leader of the Council and relevant Cabinet Member, agreed with Cllr Threlfall's statements. He argued that that the decision by the government to withdraw winter fuel allowance for pensioners, at the same time as awarding £9 billion in above inflation pay increases in an unsuccessful attempt to prevent public sector strikes, was the wrong priority. He highlighted

that most pensioners had a fixed income, so a future uplift in the state pension would cover other rises in the costs of living and not the withdrawal of the winter fuel allowance. He reported that the Department of Work and Pensions and Wiltshire Council were working to encourage eligible pensioners to claim pension credit.

The Chairman then moved that Council debate the motion, which was seconded by the Vice-Chairman and agreed by the Council.

Other Group Leaders then had the opportunity to comment on the motion.

Cllr lan Thorn, Leader of the Liberal Democrat Group, congratulated Cllr Threlfall on moving the motion, which he fully supported. He criticised the onerous process that pensioners had to go through to apply for pension credit and emphasised the importance of ensuring that Wiltshire Council communicated with people that were impacted by the changes.

Cllr Jon Hubbard, deputising for the Independent Group Leader, noted that they would give their views on an individual basis, but stated his personal concerns about the winter fuel payment decision and about the impact on the most vulnerable, though he questioned why Council had not raised similar concerns about decisions made during the previous government.

Cllr Ricky Rogers, Leader of the Labour Group, explained that, whilst he disagreed with much of the preamble to the motion, he did support the motion itself. He reported that the General Secretary of the Unite Union had moved a similar motion at the Labour Party conference. He noted that some wealthier pensioners did not need the winter fuel payment and stated that his preference would have been for the government to set a higher threshold, so it was targeted to those most in need, but was happy to support the motion as set out.

The Chairman the opened the debate for general discussion.

There were a large number of comments from members across all of the political groups in support of the motion. Many members expressed their strong opposition to the government's proposal to withdraw the winter fuel payments. Several members shared concerns from their relatives about the withdrawal of the winter fuel allowance and highlighted the difficulties that they had had in helping them to apply for pension credit.

Other comments made included raising the disproportionate impact that the measures would have on Wiltshire, the financial backdrop to the decision and need for some difficult decisions to be made by government, discussion over the level of payment reduction which would occur as a result of the decision, the role of town or parish councils in highlighting the issue, and how to raise appropriate awareness.

Some members felt that the wording of the motion could be strengthened by mandating, rather than requesting, that officers coordinate a social media and press campaign to help pensioners register for pension credits. Others raised

what they considered inconsistency in the Council not raising objections to previous government policies which they considered had impacted vulnerable persons in Wiltshire.

There was wide agreement about the need to raise awareness about pension credit, so that those entitled to claim it were doing so. It was noted that Wiltshire Council would work closely with the Department for Work and Pensions to raise awareness. The Department for Work and Pensions would be writing to all pensioners in receipt of housing benefit on 1 November, to encourage them to apply for pension credit before 21 December. In addition to publishing information on Wiltshire Council's website, and through social media, leaflets would be available in Wiltshire's libraries being run as warm spaces. Members could also encourage information to be sent out via, area boards, town and parish councils, parish magazines and other channels. It was also noted that the Wiltshire's MPs might have the opportunity to raise the issue in Parliament.

Cllr Richard Clewer, as the relevant Cabinet Member, then had the opportunity to respond to the points raised during the debate. He welcomed the broad agreement across Council and said that he would look forward to writing to the Chancellor as requested.

Cllr Threlfall, as mover of the motion, thanked councillors for their support. She noted that she was satisfied with the wording in the motion requesting officers to help pensioners register for pension credits.

It was then,

#### Resolved:

We therefore request that the Leader of the Council write to the Chancellor of the Exchequer, Rachel Reeves MP, urging a review of Labour's decision to end the Winter Fuel Payment. We also encourage officers to coordinate a social media and press campaign to show Wiltshire residents how to check their eligibility and register for pension credits.

In accordance with the Constitution there was a recorded vote.

Votes for the motion (74) Votes against the motion (0) Votes in abstention (3)

Details of the recorded vote are attached to these minutes.

## 69 Motion No. 2024-06 - Private Motor Vehicles

On the invitation of the Chairman, Cllr Dominic Muns proposed the motion as set out in the agenda, which was seconded by Cllr Nick Holder.

Cllr Muns emphasised the importance of retaining public opinion in working towards net zero targets and warned against counterproductive forms of environmental activism. Concerns were raised by Cllr Muns that the impact of imposing Low Traffic Neighbourhoods (LTNs) was often to disperse, rather than reduce, traffic. He argued that the rural landscape of Wiltshire meant that careful consideration would be required before introducing such measures in the county. Statistical evidence was provided, including that 44 percent of Wiltshire's population lived in villages and that 28 percent of people were unable to access a town centre within half an hour, by walking or using public transport. Cllr Muns emphasised that the motion did not divert from Wiltshire Council's Air Quality Action Plan but recognised the disparity in travel opportunities between Wiltshire's residents and those in large urban conurbations.

Cllr Tamara Reay, Cabinet Member with responsibility for transport, responded and welcomed the motion. She was pleased to report that Wiltshire's Local Transport Plan would come forward to Cabinet in November 2024 and that transport emissions in Wiltshire had fallen by two percent over the past year. She stressed that she was keen to do more to improve the availability of sustainable transport options and spoke about several measures that were being implemented, such as 23 electric busses being purchased for use in Salisbury from 2026. Other examples included the introduction of the Wiltshire Connect demand responsive transport service, which had been used by over 48,000 people, and the creation of seven new Local Cycling and Walking Infrastructure Plans in towns.

Members of the public that had registered to make a statement were then given the opportunity to speak.

Andrew Nicholson, on behalf of Wiltshire Climate Alliance, and Katherine Reed both made statements in opposition to the motion.

The Chairman then moved that the Council debate the motion, which was seconded by the Vice-Chairman and agreed by Council.

Group Leaders were then given the opportunity to comment.

Cllr Richard Clewer, Leader of the Council, welcomed the motion. He spoke about the need to ensure that decarbonisation did not penalise residents. He noted that environmental policy needed to be implemented in a way that respected the rural character of Wiltshire, including its reliance on the use of private motor vehicles. He explained that lots of good work was going on to support active travel in Wiltshire but that he would not support measures to force people out of their cars unless alternative dedicated infrastructure was in place. He argued that cars should be decarbonised, not penalised.

Cllr lan Thorn, Leader of the Liberal Democrat Group, stated he could not support the motion, which he argued was trying to solve a problem that did not exist, and that he did not see the logic of a motion from the group that ran the council telling themselves how to run the council. He agreed that high car usage

was necessary in the county and that policies should require community support but described the motion as divisive for communities.

Cllr Ricky Rogers, Leader of the Labour Group, explained that he was confused about the need for the motion when there were not any plans to introduce LTNs in Wiltshire.

The Chairman then opened the item for general debate.

During the debate CIIr David Vigar, proposed an amendment, which was seconded by CIIr Adrian Foster, to add the following wording to the end of the motion:

This council will pursue all means to increase accessible and affordable walking and cycling opportunities, as well as public transport services, across the county to provide sustainable alternatives to car travel.

Cllr Muns, the proposer of the original motion, did not accept Cllr Vigar's suggestion as a friendly amendment. He explained that Wiltshire Council was already taking measures to increase opportunities for sustainable travel, so the additional wording was unnecessary. He also emphasised that punitive measures were being implemented in other parts of the country to restrict car use that would not be appropriate in Wiltshire.

Group Leaders then had the opportunity to comment on the proposed amendment.

Cllr Clewer, Leader of the Council, stated that he could not support the amendment as he did not feel that it was thought through. He explained that agreeing to support all means would create an open-ended financial commitment that had the potential to bankrupt the council.

Cllr Thorn, Leader of the Liberal Democrat Group, welcomed the amendment and thought that it showed healthy ambition.

Cllr Jon Hubbard, deputising for the Independent Group, commented that the original motion refused to support any scheme to force people out of private vehicles and the amendment supported all means to help people do this, with both therefore being open ended.

Cllr Rogers, Leader of the Labour Group, stated that he remained open minded on the amendment.

The Chairman then opened the amendment to general debate.

Points made in support of the amendment included that it encouraged the promotion of health in the community. A member noted that a study of LTAs had shown that they helped to promote walking and to reduce crime.

Points made in opposition to the amendment included that it would create an unlimited financial commitment, was an example of reactive policymaking and was unnecessary given that the original motion did not oppose all schemes to reduce vehicle usage.

Cllr Vigar, as mover of the amendment, then had the opportunity to comment. He stated that his amendment would not create an unlimited financial commitment and had been deliberately misinterpreted by some members. He said that he would be content to amend the wording to 'any economical means' if it reassured members. He also highlighted that it committed to pursuing, rather than adopting, all means.

The moved of the original motion, CIIr Muns, then had the opportunity to comment.

There was then a vote on the amendment.

Votes for the amendment (27) Votes against the amendment (41) Votes in abstention (7)

In accordance with the Constitution there was a recorded vote. Details of the recorded vote are attached to these minutes.

The vote was therefore lost.

The Chairman re-opened debate on the original motion.

There were comments endorsing points raised during debate on the amendment.

Views expressed in support of the motion emphasised that measures to restrict car use tended to have a disproportionate impact on poorer and disabled drivers, and that the motion did not dilute the council's commitment to promoting active travel. The motion was praised as a measure against what some members perceived to be extreme policies implemented in other areas. It was stated that it that pay-per mile schemes could be imposed in future and that LTNs had been forced on some other areas despite strong local opposition.

Speaking in opposition to the motion some members stated that LTNs often enjoyed the support of residents in areas where they were implemented. There were several comments from members emphasising that they were not aware of any plans to impose schemes on Wiltshire to restrict car use, so did not see a need for the motion. Other statements criticised the language in the motion as inflammatory and argued that the motion should be worded in a more positive fashion to promote active travel.

Cllr Reay, the Cabinet Member with responsibility for transport, was given the opportunity to speak in accordance with the constitution.

At the conclusion of the debate, Cllr Muns, mover of the motion, stressed that the logic of the motion was simple and that it acknowledged the discrepancy in travel opportunities between Wiltshire residents and those living in large cities. He highlighted that some members that had described the motion as unnecessary had also expressed reservations about schemes implemented schemes in Bath and North East Somerset or Oxfordshire. He also reemphasised that the motion did not dilute the council's commitment to tackle air quality.

It was then,

#### Resolved:

We ask that this Council refuses to support any scheme that seeks to force people out of their private vehicles without a high quality, efficient, reliable and cost-effective alternative. Until every person who stands to be affected by such schemes has a viable alternative means of travel for education, employment, healthcare, and leisure, we request that this Council refuses to incorporate such controls over our residents.

In accordance with the Constitution there was a recorded vote.

Votes for the motion (41) Votes against the motion (23) Votes in abstention (12)

Details of the recorded vote are attached to these minutes.

## 70 Motion No. 2024-07 - Five-Year Land Supply

On the invitation of the Chairman, Cllr Nick Botterill proposed the motion as set out in the agenda, which was seconded by Cllr Philip Whitehead.

Cllr Botterill identified what he saw as the deep flaws in the use of the housing land supply metric in the planning system. He highlighted that Wiltshire Council had granted permission for around 18,000 unbuilt homes, enough to demonstrate at least a nine-year housing land supply based on current requirements. However, as only 47 percent of the homes granted permission were expected to be completed by March 2028, the council was only able to demonstrate a 3.85-year housing land supply based on government measurements. He reminded Council that as Wiltshire was not able to demonstrate a five-year housing land supply, the tilted balance in the planning system restricted their ability to prevent speculative development on green field sites.

It was argued that deficiency in the housing land supply was due to the actions of developers rather than Wiltshire Council. He argued that the system created an incentive for developers not to build on allocated sites, as it gave them a better chance of gaining permission to build on more lucrative but unallocated sites. As a result many large local authorities were unable to demonstrate the

requisite housing land supply. Cllr Botterill encouraged Council to support the motion to urge the new government to rethink the current system.

Cllr Richard Clewer, Leader of the Council, stated that the issues raised went to the heart of what was wrong with the planning system, as the way that the five-year land supply was measured allowed developers to game the system. He informed Council that the latest figures were that Wiltshire had approved planning permission for 18,837 unbuilt homes and there were around one and a half million nationwide. He emphasised that Wiltshire needed to build homes in accordance with the Local Plan but risked having decisions imposed at appeal that were only in the interests of developers.

He reported that he had lobbied the previous government heavily about this issue and that that they had started to take his feedback onboard. He had also met with the new minister in his capacity as housing spokesperson for the County Council Network to press for a system that compelled developers to build. He emphasised that no developer would be willing to build houses at a rate which saw average house prices fall.

The Chairman moved that Council debate the motion, which was seconded by the Vice-Chairman and agreed by Council.

Other Group Leaders were then invited to comment on the motion.

Cllr lan Thorn, Leader of the Liberal Democrat Group, spoke in support of the motion. He stated that different governments had been happy to allow the development industry to provide virtually all the country's social housing and huge swathes of its social infrastructure, rather than enforcing plan led development. He felt that the system had been working against communities for decades. He also noted that he had recently read that Dorset was able to demonstrate a five-year housing land supply.

Cllr Thorn then proposed an amendment to add the following words to the end of the motion, seconded by Cllr Gordon King, as he argued that developer inaction was a key factor:

Council also calls on the Leader of the Council to write to the Secretary of State to introduce legislation to compel developers to build consented plots within a set timescale.

The meeting then adjourned at approximately 4:20pm and returned at approximately 4:35pm.

When the meeting resumed, Cllr Botterill confirmed that he would not accept the amendment as a friendly amendment.

The Chairman then invited Group Leaders to comment on the proposed amendment.

Cllr Clewer, Leader of the Council, explained that he was unable to support the amendment as the legislation relating to the National Planning Policy Framework (NPPF) already existed and Wiltshire Council had already made representations about it. He also stressed that if all 18,837 unbuilt homes approved in Wiltshire were completed within a set timescale that it could far exceed the demand for housing. Although the welcomed the intention of the amendment, he felt it was a blunt instrument that would have unintended consequences.

Cllr Jonathan Seed interjected to propose that the meeting move to the vote, noting the proposer of the amendment, Cllr Thorn, was not present to speak to his amendment. Cllr Richard Britton seconded Cllr Seed's proposal.

Cllr Paul Sample JP sought to raise a point of order that Cllr Thorn had been held up in a queue.

The Chairman called for a vote on whether to put the amendment proposed by Cllr Thorn to a vote without further debate. After the vote, she declared that there were a majority against, and that debate would proceed.

Cllr Seed then raised a point of order seeking a recorded vote to confirm a majority had been against his proposal. The Chairman confirmed she was of the view there had been a majority and debate would therefore proceed.

Upon his return Cllr Thorn was invited to speak on his amendment in his capacity as Group Leader of the Liberal Democrats. Cllr Thorn described his amendment as common sense and said it got to the heart of the issue.

Cllr Jon Hubbard, deputising for the Independent Group, spoke in support of the amendment as he felt that it reinforced the original motion.

Cllr Ricky Rogers, Leader of the Labour Group, stated that he supported the amendment as well as the sentiment of the original motion.

After the Group Leaders had spoken, the Chairman then opened the general debate on whether to add the amendment to the motion.

Statements in objection to the amendment included that the only realistic mechanism to compel developers to build was to withdraw permissions and that this would exacerbate issues with the five-year land supply. It was felt that the only solution was to reform the way in which the five-year housing land supply was measured so that Wiltshire Council were held accountable for the number of permissions granted and developers were accountable for the completion rate.

Statements in support of the amendment noted that central government were the only body that could compel developers to build and that it would strengthen the original motion.

At the conclusion of the debate on the amendment, Cllr Thorn was given the opportunity to speak as its proposer. He noted concerns raised about the potential withdrawal of permissions. However, he highlighted that the request to compel developers to build was not made in isolation but was part of a representation asking the Secretary of State to review the wider five-year land supply mechanism. He also noted that withdrawing planning permission on site would have a significant impact on the balance sheet of housebuilding companies.

Cllr Botterill, the proposer of the original motion, then responded, emphasising that compelling all permissions to be built in five years would create a significant oversupply. He believed building that number of houses was undeliverable in that timeframe and compelling developers in that way would not with stand legal challenge.

There was then a vote of whether to add the amendment to the motion.

Votes for the amendment (25) Votes against the amendment (35) Votes in abstention (0)

Details of the recorded vote are attached to these minutes.

The Chairman gave the opportunity to the Group Leaders that had not already spoken on the original motion to do so.

The Chairman then opened original motion to general debate.

One member stated that he did not see the need for the debate as the new government's consultation on changes to the NPPF had closed on 24 September. He stated that the position of the new government was, in his view, that all planning authorities should be compelled to maintain a five-year housing land supply. He did not believe that there was any chance of the government changing their position. Another member stated that it was Wiltshire Council's responsibility to stand up against development that was not in accordance with the democratically approved Local Plan.

Other issues discussed included how Wiltshire Council was going to make progress towards demonstrating a four-year housing land supply before the government passed its legislation on the NPPF.

Cllr Botterill, as the mover of the motion, was given the opportunity to make closing remarks. He stated that emerging local plans at latter stages of scrutiny, such as Wiltshire's, would continue to be examined under the version of the NPPF they were submitted under. He also confirmed that it had been announced that local authorities would be required to demonstrate a five, rather than four-year housing land supply. Whilst he wanted Wiltshire to demonstrate a five-year supply he did not feel this was not possible without cooperation from developers.

It was then,

#### Resolved:

This Council calls on the Leader of the Council to write to the Secretary of State for Levelling Up, Housing and Communities, the Shadow Secretary of State for Housing, Communities and Local Government and the MPs representing Wiltshire to make them aware of the manifest flaws in the Housing Land Supply measure as currently applied and as proposed as part of the government's planning reform consultation.

In accordance with the Constitution there was a recorded vote.

Votes for the motion (59) Votes against the motion (1) Votes in abstention (1)

Details of the recorded vote are attached to these minutes.

## 71 Motion No. 2024-08 - Wiltshire's Rivers

On the invitation of the Chairman, Cllr Robert MacNaughton, proposed the motion as set out in the agenda, which was seconded by Cllr Ashley O'Neill.

Cllr MacNaughton stated that he felt very strongly that human waste needed to be taken out of Wiltshire's rivers. He explained that lots of people he met shared his deep concern about the state of rivers and the natural environment, including local MPs. He referenced public reporting stating that 84 percent of Britain's rivers were in poor health. He noted that Calne had held its first river festival in 2021, for the River Marden, and a well-attended river blessing in 2023, so there was widespread support for improving river quality. He then spoke about the importance of Wiltshire Council working constructively with water companies to understand what they were going to do to reduce the amount of sewage in Wiltshire's rivers.

Cllr Dominic Muns, the Cabinet Member for Waste and Environment, responded and spoke in support of the motion.

The Chairman then moved that Council debate the motion, which was seconded by the Vice-Chairman and agreed by Council.

Group Leaders were then invited to comment on the motion.

Cllr Richard Clewer, Leader of the Council, welcomed the motion, which he felt would send a strong message to water companies about the need to meet their legislative responsibilities. He explained that Natural England and European Union policy had put too much onus on new housing developments to address nutrient issues in rivers. He felt that there had also been a long-term underinvestment in infrastructure.

Cllr lan Thorn, Leader of the Liberal Democrat Group, praised Cllr MacNaughton and those that had worked alongside him for drafting the motion. Cllr Thorn then shared his experiences of attending river blessings with Cllr MacNaughton and outlined some of his concerns about the natural environment.

The Chairman then opened the motion to wider debate.

There were many comments made in general support of the motion. The need to have constructive dialogue with water companies was stressed, especially given well reported concerns about regulation, investment in infrastructure, and setting the right level of bills for consumers. One member noted that they had spoken to Wessex Water in advance of the meeting and that they had stated that they welcomed the opportunity to work with Wiltshire Council. Another suggestion was for an overarching water policy for the county that included upgrading septic tanks and measures in the draft Local Plan to reduce water consumption in new homes.

The impact the rivers could have on public health and safety was also raised, especially during times of flooding. It was reported that water companies attended the two Operational Flood Working groups in Wiltshire and held productive discussions about issues such as storm overflow into rivers. It was suggested that the Wessex Rivers Trust charity could also be invited to meetings. There was also praise for the cross-party way in which the motion had been prepared.

At the conclusion of the debate, the Cabinet Member, Cllr Muns, then had the opportunity to comment.

Cllr MacNaughton, as mover of the motion, thanked his fellow councillors for working on a cross-party basis and for their supportive comments.

It was then,

#### Resolved

- 1) Council is disappointed by the water industry's failure to prevent sewage being discharged into Wiltshire's Rivers. We call on water companies operating in Wiltshire; Wessex Water, Thames Water, and Southern Water to make the required investment to protect our Rivers as a priority.
- 2) Council requests a meeting with executives of Wessex Water, Thames Water and Southern Water to receive greater clarity on future investment in the overdue upgrades to our sewage systems in Wiltshire.
- 3) Council calls on Wessex Water, Thames Water and Southern Water to join the Council in engaging with the government and Oftwat to discuss how the burden of the necessary investment in Wiltshire is addressed.

In accordance with the Constitution there was a recorded vote.

Votes for the motion (60) Votes against the motion (0) Votes in abstention (0)

Details of the recorded vote are attached to these minutes.

## 72 Motion No. 2024-09 - Resurfacing Works, Western Way, Salisbury

The Chairman noted that the motion proposed by Cllr Ricky Rogers and seconded by Cllr Caroline Corbin, had been withdrawn. It was noted that resurfacing works on Western Way either had, or were about to, commence.

# 73 Motion No. 2024-10 - Salisbury Transportation Strategy

On the invitation of the Chairman, Cllr Ricky Rogers proposed the motion as set out in the Summons, which was seconded by Cllr Sam Charleston.

Cllr Rogers explained that Salisbury Area Board had been seeking information for a lengthy period about its bid to the Salisbury Transportation Fund through the Local Highway and Footway Improvement Group (LHFIG). He explained that the Area Board had gone through due process but had yet to receive an answer.

Cllr Tamara Reay, Cabinet Member with responsibility for transport, was then given the opportunity to respond directly to the motion, but had no comment.

The Chairman moved that the motion be referred to the Leader for appropriate action without debate, which was seconded by the Vice-Chairman. Cllr Rogers confirmed that he was happy for the matter to be referred to the Leader. If resolved the Leader would therefore write to the proposers of the motion, with a copy sent to all Members of the Council, advising them what steps he proposed to take.

It was therefore,

## Resolved:

To refer the motion to the Leader for any appropriate action.

## 74 Proposed Changes to the Constitution

The Chairman invited Cllr Ashley O'Neill, Cabinet Member with responsibility for Governance, to move the motion to approve the proposed changes to the Constitution, which was seconded by Cllr Richard Clewer, Leader of the Council.

Cllr O'Neill referred Council to the report details in the agenda setting out proposed changes to Protocol 2 (Terms of Reference of the Wiltshire Pension Fund Committee and Local Pension Board) and Protocol 6 (Complaints Procedure) of the Constitution.

Group Leaders then had the opportunity to comment. CIIr Ricky Rogers, Leader of the Labour Group, stated that the changes were well written and supported the motion.

The Chairman then opened the item for general debate.

A statement was made in general support of the motion, and it was noted that the changes had been considered by the Constitution Focus Group and Standards Committee.

There being no further comments in debate or summation, it was then,

### Resolved:

That Council approve the following updated sections of the Constitution:

- 1) Protocol 2A Terms of Reference of the Wiltshire Pension Fund Committee
- 2) Protocol 6 Complaints Procedure

In accordance with the Constitution there was a recorded vote.

Votes for the motion (59) Votes against the motion (0) Votes in abstention (0)

Details of the recorded vote are attached to these minutes.

## 75 **Appointments Report**

The Chairman invited Cllr Ashley O'Neill, Cabinet Member with responsibility for governance, to move the motion to extend the appoint of the council's Independent Persons, which was seconded by Cllr Richard Clewer, Leader of the Council.

Cllr O'Neill explained that changes had been requested by officers and would allow the appointed Independent Persons to continue their service beyond the end of the council term, until August 2025. The changes would allow any Code of Conduct related matters to be appropriately dealt with until additional recruitment took place.

Group Leaders then had the opportunity to comment before the Chairman opened the item for general debate.

A comment was made in support of the proposals and thanks were given to the independent members for their hard work and analysis in interacting with and advising regarding Code of Conduct complaints.

There being no further comments in debate or summation, it was then,

#### Resolved:

That Council extend the terms of the council's three Independent Persons until August 2025.

### 76 Announcements from Cabinet and Committees

There were no announcements.

## 77 <u>Membership of Committees</u>

Group Leaders proposed changes to membership of committees. On the proposal of the Chairman, seconded by the Vice-Chairman, it was then,

## Resolved:

- 1) To make the following changes to Committees:
  - That Cllr Mike Sankey be removed as a Member of the Standards Committee, Children's Select Committee, and Northern Area Planning Committee
  - That Cllr Mike Sankey also be removed as a Substitute for the Standards Assessment Sub Committee and Western Area Planning Committee.
  - That Cllr Richard Britton be added as a Member of the Standards Committee.
  - That Cllr Caroline Thomas be added as a Member of the Children's Select Committee.
  - That Cllr Ashley O'Neill be added as a Member of the Northern Area Planning Committee.
  - That CIIr Iain Wallis be added as a Substitute for the Standards Committee.
  - That Cllr Nick Holder be added as a Substitute for Western Area Planning Committee.
  - That Cllr Stuart Wheeler be added as a Substitute for the Northern Area Planning Committee and the Western Area Planning Committee.
  - That Clir Sam Pearce Kearney be added as a Member of Eastern Area Planning Committee.
  - That Cllr Dr Brain Mathew MP be removed as a Member of the Eastern Area Planning Committee.
  - That Cllr Bowler be added as a Substitute to the Eastern Area Planning Committee.
- 2) That Council ratify the reappointment of Marlene Corbey to the Local Pension Board as a Scheme Member representative (Unison representative) for a period of four years.

# 78 Questions from Members of the Council

The Chairman highlighted that there were 11 questions submitted by Members for the meeting within the scope of the constitution. The questions, together with any written responses, were listed in Agenda Supplement 2.

It was noted that the questions submitted by CIIr David Vigar had been taken under Minute 63. As CIIr Edward Kirk sent his apologies for the meeting, a written response to Question 24-35 would be included with the minutes.

For Question 24-36 relating to Stone Circle, Cllr Jon Hubbard asked supplementary questions on whether the houses purchased were all used to meet demand on the housing list and whether any priority had been given to care leavers. He also asked whether there would be any payment of the referenced loan before the expiry of the 50-year period and, if so, how those payments were being met.

Cllr Phil Alford, Cabinet Member for Housing, said that he would provide a written response to the supplementary questions.

(Duration of meeting: 10.30 am - 5.55 pm)

The Officers who have produced these minutes are Matt Hitch and Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail committee@wiltshire.gov.uk

Press enquiries to Communications, direct line 01225 713114 or email communications@wiltshire.gov.uk

Wiltshire Council

**Full Council** 

15 October 2024

#### Item 18 - Members' Questions

## From Cllr Edward Kirk – Trowbridge Adcroft Division

# To lan Blair-Pilling, Cabinet Member for Public Health, Communities, Leisure and Libraries

## **Question (24-35)**

At the Trowbridge Area Board on Thursday 3rd October, where the Cabinet Member for Leisure, Cllr lan Blair-Pilling provided an update and asked for any questions from the Public or Councillors on the Trowbridge Leisure Centre, which is being built on the East Wing Car Park. The Cabinet Member refused/declined (failed to answer) my question on what the alternative plans were for Staff Car Parking and whether Residents/Visitors and Workers in the Town (the Public), would still receive Free Car Parking on Saturdays and Sundays in the remaining County Hall car parking spaces.

The Cabinet Member made bold statements regarding the high level of project management and planning behind this much needed Trowbridge Leisure Centre and stated that the planning application is already in and that they have a projected start date of early next year. Given these facts, I do not think it is unreasonable to have a direct answer now to the question:

What are the alternative plans for Staff Car Parking and will the Public still receive Free Car Parking on Saturdays and Sundays in the remaining Wiltshire Council Staff Car Parking spaces at County Hall?

## Response:

Following the proposal to build the new the new Trowbridge Leisure Centre on the County Hall east wing site, there will be less available space at this location. A car parking review is being undertaken to both understand occupancy rate of staff car parks and to replace the majority (if not all) of spaces that will be lost because of the Leisure Centre build to ensure there continues to be adequate spaces to accommodate staff and visitors



# Recorded Votes - Council - 15 October 2024

Details of resolutions included within the minutes

# Item 8 - Wiltshire Local Plan Review

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Jane Davies, Cllr Andrew Davis, Cllr Dr Monica Devendran, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Jon Hubbard, Cllr Peter Hutton, Cllr Tony Jackson, Cllr Mel Jacob, Cllr George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Kathryn Macdermid, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Dr Nick Murry, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Jack Oatley, Cllr Andrew Oliver, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Tony Pickernell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Tom Rounds, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill	80
Against	Cllr Matthew Dean	1
Abstain	CIIr Brian Dalton	1

Item 9 – Enforcement Policy

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Dr Monica Devendran, Cllr Nick Dye, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Peter Hutton, Cllr Tony Jackson, Cllr Mel Jacob, Cllr George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Dr Nick Murry, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Jack Oatley, Cllr Andrew Oliver, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Tony Pickernell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Tom Rounds, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill	83
Against	None	0
Abstain	None	0

Item 10 - Statement of Licensing policy

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Dr Monica Devendran, Cllr Nick Dye, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Peter Hutton, Cllr Mel Jacob, Cllr George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Dr Nick Murry, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Jack Oatley, Cllr Andrew Oliver, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Tom Rounds, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill	80
Against	None	0
Abstain	Cllr Matthew Dean	1

Item 11 - Statement of Gambling Principles

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr lan Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Dr Monica Devendran, Cllr Nick Dye, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Peter Hutton, Cllr Mel Jacob, Cllr George Jeans, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Dr Nick Murry, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Sak Oatley, Cllr Andrew Oliver, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Tom Rounds, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr lain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill	77
Against	None	0
Abstain	None	0

Item 13a - Motion 2024-05 - Winter Fuel Payments

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr lan Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Daniel Cave, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Caroline Corbin, Cllr Kevin Daley, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Dr Monica Devendran, Cllr Nick Dye, Cllr Gavin Grant, Cllr Ross Henning, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Peter Hutton, Cllr Tony Jackson, Cllr George Jeans, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Laura Mayes, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Jack Oatley, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Tony Pickemell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Top Ridout, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr lan Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams, Cllr Graham Wright and Cllr Robert Yuill	74
Against	None	0
Abstain	Cllr Adrian Foster, Cllr Jon Hubbard and Cllr Dr Mark McClelland	3

# Item 13b - Motion 2024-06 - Private Motor Vehicles

# **Private Motor Vehicles Amendment**

Amendment status: Rejected

Voting	Voting		
Vote	Councillors	Count	
For	Cllr Liz Alstrom, Cllr David Bowler, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Sam Charleston, Cllr Brian Dalton, Cllr Nick Dye, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr Carole King, Cllr Gordon King, Cllr Robert MacNaughton, Cllr Dr Brian Mathew MP, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Horace Prickett, Cllr Paul Sample JP, Cllr Martin Smith, Cllr Jo Trigg, Cllr David Vigar, Cllr Derek Walters and Cllr Graham Wright	27	
Against	Cllr Phil Alford, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Richard Britton, Cllr Daniel Cave, Cllr Mary Champion, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Kevin Daley, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Nick Holder, Cllr Peter Hutton, Cllr George Jeans, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Tony Pickernell, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr lain Wallis, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Robert Yuill	41	
Abstain	Cllr Caroline Corbin, Cllr Dr Monica Devendran, Cllr Dr Nick Murry, Cllr Kelvin Nash, Cllr Pip Ridout, Cllr Ricky Rogers and Cllr James Sheppard	7	

# **Private Motor Vehicles:**

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Richard Britton, Cllr Daniel Cave, Cllr Mary Champion, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Mark Connolly, Cllr Kevin Daley, Cllr Jane Davies, Cllr Andrew Davis, Cllr Dr Monica Devendran, Cllr Nick Holder, Cllr Peter Hutton, Cllr Tony Jackson, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Tony Pickernell, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Mark Verbinnen, Cllr lain Wallis, Cllr Bridget Wayman, Cllr Stuart Wheeler, Cllr Philip Whitehead, Cllr Suzanne Wickham and Cllr Christopher Williams	41
Against	Cllr Liz Alstrom, Cllr David Bowler, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Sam Charleston, Cllr Caroline Corbin, Cllr Brian Dalton, Cllr Matthew Dean, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr George Jeans, Cllr Gordon King, Cllr Dr Nick Murry, Cllr Stewart Palmen, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Martin Smith, Cllr Ian Thorn and Cllr Graham Wright	23
Abstain	Cllr Richard Budden, Cllr Nick Dye, Cllr Carole King, Cllr Robert MacNaughton, Cllr Kelvin Nash, Cllr Sam Pearce-Kearney, Cllr Horace Prickett, Cllr Mike Sankey, Cllr Jo Trigg, Cllr David Vigar, Cllr Derek Walters and Cllr Robert Yuill	12
Not Present	None	0

# Item 13c - Motion 2024-07 - Five-Year Land Supply

# **Amendment - Five-Year Land Supply:**

Amendment status: Rejected

Voting		
Vote	Councillors	Count
For	Cllr Liz Alstrom, Cllr David Bowler, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Sam Charleston, Cllr Brian Dalton, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr Carole King, Cllr Gordon King, Cllr Robert MacNaughton, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Martin Smith, Cllr Ian Thorn, Cllr Jo Trigg, Cllr David Vigar and Cllr Derek Walters	25
Against	Cllr Phil Alford, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Richard Britton, Cllr Mary Champion, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Nick Holder, Cllr Peter Hutton, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Caroline Thomas, Cllr Elizabeth Threlfall, Cllr Mark Verbinnen, Cllr lain Wallis, Cllr Bridget Wayman, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Robert Yuill	35
Abstain	None	0
Not Present	None	0

# Five-Year Land Supply:

Voting			
Vote	Councillors	Count	
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr lan Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Peter Hutton, Cllr Mel Jacob, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr lan Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Robert Yuill	59	
Against	Cllr George Jeans	1	
Abstain	Cllr Matthew Dean	1	
Not Present	None	0	

# Item 13d - Motion 2024-08 - Wiltshire's Rivers:

Voting			
Vote	Councillors	Count	
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Ross Henning, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr George Jeans, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Ian Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Mark Verbinnen, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Robert Yuill	60	
Against	None	0	
Abstain	None	0	
Not Present	None	0	

# Item 14 – Proposed Changes to the Constitution:

Voting		
Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr David Bowler, Cllr Richard Britton, Cllr Richard Budden, Cllr Clare Cape, Cllr Trevor Carbin, Cllr Mary Champion, Cllr Sam Charleston, Cllr Pauline Church, Cllr Richard Clewer, Cllr Zoë Clewer, Cllr Brian Dalton, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr George Jeans, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Jacqui Lay, Cllr Robert MacNaughton, Cllr Laura Mayes, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Kelvin Nash, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Stewart Palmen, Cllr Sam Pearce-Kearney, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Ian Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Derek Walters, Cllr Bridget Wayman, Cllr Philip Whitehead, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Robert Yuill	59
Against	None	0
Abstain	None	0



# Full Council Meeting - 15 October 2024 - Members' Attendance

Councillor Name	Time in (Meeting start – 10.30)	Time Out (Meeting close – 17:55)
Phil Alford	10:30	Meeting close
Liz Alstrom	10:30	17:40
Helen Belcher OBE		Apologies
Chuck Berry		Apologies
Ian Blair-Pilling	10:30	Meeting close
Nick Botterill	10:30	Meeting close
David Bowler	10:30	Meeting close
Richard Britton	10:30	Meeting close
Allison Bucknell		Apologies
Steve Bucknell		Apologies
Richard Budden	10:30	Meeting close
Clare Cape	10:30	Meeting close
Trevor Carbin	10:30	Meeting close
Daniel Cave	10:30	16:00
Mary Champion	10:30	Meeting close
Sam Charleston	10:30	Meeting close
Pauline Church	10:30	Meeting close
Ernie Clark	10:30	15:15
Richard Clewer	10:30	Meeting close
Zoë Clewer	10:30	Meeting close
Mark Connolly	10:30	16:20
Caroline Corbin	10:30	16:20
Kevin Daley	10:30	Meeting close
Brian Dalton	10:30	Meeting close
Jane Davies	10:30	Meeting close
Andrew Davis	10:30	Meeting close
Matthew Dean	10:30	Meeting close
Dr Monica Devendran	10:30	16:00
Nick Dye	10:30	Meeting Close
Adrian Foster	10:30	Meeting close
Sarah Gibson MP		Apologies
Gavin Grant	10:30	Meeting close
Howard Greenman	1	Apologies
Ross Henning	10:30	17:40
Sven Hocking	10:30	12:45
Nick Holder	10:30	Meeting close
Ruth Hopkinson	10:30	Meeting close
Jon Hubbard	10:30	Meeting close
Peter Hutton	10:30	17:15
Tony Jackson	10:30	16:15

Mel Jacob	10:30	Meeting close
Simon Jacobs		Apologies
George Jeans	10:30	Meeting close
Johnny Kidney	10:30	13:00
Carole King	10:30	Meeting close
Gordon King	10:30	Meeting close
Edward Kirk		Apologies
Jerry Kunkler	10:30	Meeting close
Jacqui Lay	10:30	Meeting close
Kathryn MacDermid	10:30	12:05
Dr Brian Mathew MP	10:30	15:45
Laura Mayes	10:30	Meeting close
Dr Mark McClelland	10:30	Meeting close
Charles McGrath	10:30	Meeting close
Ian McLennan		Apologies
Dominic Muns	10:30	Meeting close
Dr Nick Murry	10:30	16:00
Nabil Najjar	10:30	Meeting close
Kelvin Nash	10:30	16:20
Christopher Newbury	10:30	Meeting close
Ashley O'Neill	10:30	Meeting close
Jack Oatley	10:30	14:35
Paul Oatway QPM		Apologies
Andrew Oliver	10:30	12:50
Stewart Palmen	10:30	Meeting close
Bill Parks		Apologies
	10:30	Meeting close
Sam Pearce-Kearney Antonio Piazza		Apologies
	10:30	Meeting close
Tony Pickernell Horace Prickett	10:30	Meeting close
	10:30	16:30
Nic Puntis	10:30	Meeting close
Tamara Reay Pip Ridout	10:30	16:00
Rich Rogers		Apologies
•	10:30	Meeting close
Ricky Rogers Tom Rounds	10:30	14:20
	10:30	Meeting close
Paul Sample JP	10:30	16:20
Mike Sankey	10:30	Meeting close
Jonathon Seed		<u> </u>
James Sheppard	10:30 10:30	Meeting close  Meeting close
Martin Smith		<u> </u>
Caroline Thomas	10:30 10:30	Meeting close
Ian Thorn		Meeting close
Elizabeth Threlfall	10:30	Meeting close
Jo Trigg	10:30	Meeting close
Tim Trimble	10:30	15:45

Mark Verbinnen	10:30	Meeting close
David Vigar	10:30	Meeting close
Iain Wallis	10:30	Meeting close
Derek Walters	10:30	Meeting close
Bridget Wayman	10:30	Meeting close
Stuart Wheeler	10:30	Meeting close
Philip Whitehead	10:30	Meeting close
Suzanne Wickham	10:30	Meeting close
Christopher Williams	10:30	Meeting close
Graham Wright	10:30	Meeting close
Robert Yuill	10:30	Meeting close





### Council

MINUTES OF THE EXTRAORDINARY COUNCIL MEETING HELD ON 9 JANUARY 2025 AT COUNCIL CHAMBER - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### Present:

Cllr Bridget Wayman (Chairman), Cllr Christopher Newbury (Vice-Chairman), Cllr Phil Alford, Cllr Liz Alstrom, Cllr Helen Belcher OBE, Cllr Chuck Berry, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Richard Britton, Cllr Allison Bucknell, Cllr Steve Bucknell, Cllr Richard Budden, Cllr Trevor Carbin, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Jane Davies, Cllr Andrew Davis, Cllr Matthew Dean, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Howard Greenman, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr Simon Jacobs. Cllr George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Edward Kirk, Cllr Jerry Kunkler, Cllr Dr Brian Mathew MP, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr lan McLennan, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Jack Oatley, Cllr Paul Oatway QPM, Cllr Andrew Oliver, Cllr Ashley O'Neill, Cllr Stewart Palmen, Cllr Bill Parks. Cllr Sam Pearce-Kearney, Cllr Antonio Piazza, Cllr Tony Pickernell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Mike Sankey, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Ian Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr lain Wallis, Cllr Stuart Wheeler, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Graham Wright

### 1 Apologies

Apologies for absence were received from the following Members:

David Bowler, Clare Cape, Mary Champion, Zoë Clewer, Mark Connolly, Caroline Corbin, Brian Dalton, Dr Monica Devendran, Sarah Gibson MP, Peter Hutton, Tony Jackson, Jacqui Lay, Kathryn MacDermid, Laura Mayes, Dr Nick Murry, Kelvin Nash, Andrew Oliver, Derek Walters, and Philip Whitehead.

### 2 **Declarations of Interest**

There were no declarations of disclosable interests.

# 3 Chairman's Announcements

The Chairman provided details to Members of arrangements to be followed in the event the meeting extended beyond 9pm.

#### 4 Public Participation

The details of public participation for the meeting were explained.

# 5 **Devolution Priority Programme**

#### Introduction

At the invitation of the Chairman the Leader of the Council, Cllr Richard Clewer, presented a report and update on the progression of the government's devolution proposals regarding local authorities. He set out his recommendation that the council seek inclusion within the devolution priority programme in order to expedite the establishment of a strategic mayoral authority of which Wiltshire Council would be a part. The proposal was seconded by Cllr Nick Botterill.

Cllr Clewer summarised the progression of the government's devolution plans, culminating in the publication of a White Paper in December 2024. He explained that he was not convinced that mayors were the most appropriate arrangement for large rural authorities, but that government had made it clear that its plans for strategic authorities intended all parts of England to be covered, and for this to include mayors. He welcomed some of the additional clarity provided by the White Paper, noting that many areas would see significant local government reorganisation alongside plans for the new strategic authorities, which were planned to include at least 1.5m residents. Mayors would work with local councils and act as a conduit for funding in specific delivery areas.

It was emphasised that councils had been invited to indicate the geographic extent of a strategic authority they considered appropriate, but that if progress was not made with local councils, ministers would have the authority to define the areas regardless. There was therefore an opportunity for Wiltshire Council to seek to positively input into the extent of the strategic authority to which Wiltshire would be assigned. As a result, extensive discussions had been held with Somerset and Dorset Councils on a Heart of Wessex proposal, with additional communication with Swindon Borough Council (SBC), North Somerset Council, and Bournemouth, Christchurch, and Poole Council (BCP) around their potential involvement if they considered it appropriate.

Cllr Clewer stated that support for the proposal was not a commitment to joining a new Heart of Wessex combined authority, but a statement that Wiltshire Council, alongside Somerset and Dorset Councils, was prepared to explore the option with government, which would be consulted upon early in 2025, with detailed recommendations to follow later in the year to be approved by the constituent councils at a future point.

In conclusion CIIr Clewer stated whilst he had some reluctance over the devolution programme there were some potential benefits to be gained, and there was a risk that if the council did not engage at this stage, it could face a less suitable proposal later. He therefore sought the support of Council for him to send a letter to the relevant Minister to seek inclusion within the devolution priority programme.

#### Public Participation

Questions submitted by Members of the Public were then received, as set out in the agenda supplement.

Andrew Nicolson was in attendance and asked supplementary questions following the written responses to his submitted questions. In relation to the Question P25-02 and the Western Gateway Sub-National Transport body, Mr Nicolson asked whether the Leader saw problems with a jigsaw of overlapping regional and pan-regional bodies, or if there were advantages to recognising some issues and transport in particular not being constrained by monolithic administrative boundaries.

Cllr Clewer responded that the government needed to undertake further work on what it wished to achieve with regional sub-transport, with some suggestion multiple mayors would need to work together on those issues, as it was the case the transport would span across any new mayoralty areas.

In relation to the Question P25-03 Mr Nicolson asked about whether a local nature partnership, including climate as well, would have the option of spanning Wiltshire and Swindon, or even the Heart of Wessex area.

Cllr Clewer responded that such an area might be too large for such a partnership, noting that the local councils would still exist for such purposes, though some coordination through a mayor might be a possibility.

Mr Nicolson also asked for clarity on perceived benefits to a Heart of Wessex proposal including Swindon and Bournemouth, Christchurch, and Poole.

Cllr Clewer responded that he considered existing county boundaries were a good starting basis for strategic authorities, enabling as much joining up of public service provision as possible which was important in areas with successful devolution arrangements, but that it was a decision for SBC and BCP to decide if they felt it was best for their residents.

### **Group Leaders**

Other political group leaders were then invited to comment ahead of the debate on the proposal.

Cllr lan Thorn, Leader of the Liberal Democrat Group, thanked officers for organising the extraordinary meeting at short notice over the holiday period to enable Members to have their say on the devolution process. He stated the devolution process had been discussed in good faith by the councils involved in the face of the intense speed government was moving with the programme and welcomed their collaborative approach. He also criticised the government's process for the programme to date, and stated he was not in favour of a further tier of government and bureaucracy, but did not think the council was in a position to simply oppose the government's intentions. Cllr Thorn commented that the door should be left open for Swindon Borough Council to be included if they considered it appropriate, given its economic status within Wiltshire. It was further stated that putting communities first was essential and that the council needed to do everything it could to ensure that was at the heart of any devolution process, and that the reality was whoever was running the council in the future would need to engage in the devolution process to get the best possible arrangement for Wiltshire residents.

Cllr Ernie Clark, Leader of the Independent Group, noted that many Members were not in favour of the devolution programme suggestions, but given the government's intentions the question was whether it was best for Wiltshire residents to engage in the process at the early stage or wait until the end. He stated he had received many comments opposed to the proposals, but his concern was that if the council did not engage with the process now a worse situation would be imposed at a later date. He therefore reluctantly supported the proposal of the Leader.

Cllr Ricky Rogers, Leader of the Labour Group, thanked the Leader for his update to Council. He noted that creating strategic authorities led by mayors was part of the government agenda, and that in order to get the best outcome for the people of Wiltshire it would be best to engage at the beginning of the process. Cllr Rogers stated he had some concerns around whether the proposals would truly devolve decision-making to local people, and how they would feel involved in the new authority, as well as ensuring all areas of the authority received a fair share of any funding, but that he supported the motion to begin the process. He concluded by noting the electoral campaigning challenge for any future mayoral candidate looking to represent such a large area.

#### Debate

The Chairman then opened the item and proposal for debate.

Comments in support of the proposal to seek inclusion in the devolution priority programme included that there was broad support for the council entering into the programme as requested, though many Members indicated they did so pragmatically or even reluctantly. The direction mandated by central government was noted, alongside the potential negatives to delaying engagement, as well as potential benefits from proactive engagement. It was argued that the council would benefit from adopting a coherent approach to enter into negotiations on the future arrangements at this early stage.

Other comments included welcoming the co-operative approach taken by the three councils in the core Heart of Wessex proposal, supporting the principle of devolving powers and improvement to regional collaboration and strategic planning in areas such as transport and development, or hopefully working in place of current bodies such as National Highways. Encouraging the inclusion of Swindon Borough Council was also raised.

Comments in opposition to the proposal included that the government proposals were an unwanted imposition of additional bureaucracy and complexity, for which there had been and would not be genuine consultation with the public. It was argued that although Somerset, Dorset, and Wiltshire were large rural authorities they still had distinct priorities, for example in respect of local rail services and planning, which would not be better served with a mayor.

There was scepticism that government would engage more meaningfully with new strategic mayors than with local councils, and comments that a lack of

engagement by Wiltshire Council at this early stage would likely not lead to negative consequences, and as such Members should express their opposition to the proposals by voting against the motion.

Other comments in opposition included that the 1.5m population target for new strategic authorities was arbitrary and unnecessary and would still result in major administrative areas and economies relevant to Wiltshire not being included, such as Bath and Bristol. It was also argued that government could empower local councils in a simple and easy way by abolishing council tax rate caps, returning all business rates to the local council which raised them, and abolishing the National Planning Policy Framework and mandated housing targets.

There were comments whether in support of or against the proposal for inclusion in the programme arguing that further layers of government were not needed. Concerns were raised that there was a risk that the strategic mayoral authorities would be taking powers from local councils rather than being devolved powers from central government as devolution should require, and that a strategic approach could miss important local context.

The need to have scrutiny of any mayoral decision-making and ways of holding them to account democratically was emphasised, to ensure a single individual did not hold too much authority over such a large area, as well as queries relating to the level of precept raising and borrowing powers for any mayoralty, and their general power of competence.

Cllr Clewer then had the opportunity to respond to comments made during the debate. He acknowledged the concerns raised by some Members, whilst stating that in the new mayoral model there needed to be a voice for rural England. Details were provided on mayors having precepting power and limited borrowing power, as well as general power of competence, for current mayor arrangements, with more information needed on how this would apply under newer arrangements. There would be some form of Scrutiny for any mayoral authority. He also noted that councils could work together well without a mayor, as had been demonstrated with co-operation and co-ordination with the Leaders of Dorset and Somerset despite political differences.

In conclusion, whilst there were reservations around the direction from central government and on some of the details which were still to be developed, Cllr Clewer argued that supporting the proposal was the best path forward for Wiltshire.

It was then,

#### Resolved:

That Full Council supports the intention of the Leader to write to the relevant Minister seeking inclusion in the Devolution Priority Programme on the basis of the single Member decision report included with the Summons.

In accordance with the Constitution there was a recorded vote.

Votes for the motion (65) Votes against the motion (7) Votes in abstention (1)

Details of the vote are attached as an appendix to the minutes.

(Duration of meeting: 6.00 - 7.30 pm)

The Officer who has produced these minutes is Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail <a href="mailto:committee@wiltshire.gov.uk">committee@wiltshire.gov.uk</a>

Press enquiries to Communications, direct line 01225 713114 or email <a href="mailto:communications@wiltshire.gov.uk">communications@wiltshire.gov.uk</a>

# Recorded Vote – Extraordinary Meeting of Full Council – 9 January 2025

# Item 5 – Devolution Priority Programme

Vote	Councillors	Count
For	Cllr Phil Alford, Cllr Liz Alstrom, Cllr Helen Belcher OBE, Cllr Chuck Berry, Cllr Ian Blair-Pilling, Cllr Nick Botterill, Cllr Allison Bucknell, Cllr Steve Bucknell, Cllr Richard Budden, Cllr Sam Charleston, Cllr Pauline Church, Cllr Ernie Clark, Cllr Richard Clewer, Cllr Jane Davies, Cllr Andrew Davis, Cllr Adrian Foster, Cllr Gavin Grant, Cllr Howard Greenman, Cllr Ross Henning, Cllr Sven Hocking, Cllr Nick Holder, Cllr Ruth Hopkinson, Cllr Jon Hubbard, Cllr Mel Jacob, Cllr Simon Jacobs, Cllr George Jeans, Cllr Johnny Kidney, Cllr Carole King, Cllr Gordon King, Cllr Jerry Kunkler, Cllr Dr Brian Mathew MP, Cllr Dr Mark McClelland, Cllr Charles McGrath, Cllr Ian McLennan, Cllr Dominic Muns, Cllr Nabil Najjar, Cllr Ashley O'Neill, Cllr Jack Oatley, Cllr Paul Oatway QPM, Cllr Andrew Oliver, Cllr Stewart Palmen, Cllr Bill Parks, Cllr Sam Pearce-Kearney, Cllr Tony Pickernell, Cllr Horace Prickett, Cllr Nic Puntis, Cllr Tamara Reay, Cllr Pip Ridout, Cllr Ricky Rogers, Cllr Paul Sample JP, Cllr Jonathon Seed, Cllr James Sheppard, Cllr Martin Smith, Cllr Caroline Thomas, Cllr Ian Thorn, Cllr Elizabeth Threlfall, Cllr Jo Trigg, Cllr Tim Trimble, Cllr Mark Verbinnen, Cllr David Vigar, Cllr Iain Wallis, Cllr Stuart Wheeler, Cllr Suzanne Wickham, Cllr Christopher Williams and Cllr Graham Wright	65
Against	Cllr Trevor Carbin, Cllr Matthew Dean, Cllr Edward Kirk, Cllr Christopher Newbury, Cllr Antonio Piazza, Cllr Mike Sankey and Cllr Bridget Wayman	7
Abstain	CIIr Richard Britton	1



# Extraordinary Full Council Meeting - 9 January 2025 - Members' Attendance

Councillor Name	Time in (Meeting start – 18.00)	Time Out (Meeting close – 19.30)			
Phil Alford	18.00	Meeting Close			
Liz Alstrom	18.00	Meeting Close			
Helen Belcher OBE	18.00	Meeting Close			
Chuck Berry	18.00	Meeting Close			
Ian Blair-Pilling	18.00	Meeting Close			
Nick Botterill	18.00	Meeting Close			
David Bowler	A	pologies			
Richard Britton	18.00	Meeting Close			
Allison Bucknell	18.00	Meeting Close			
Steve Bucknell	18.00	Meeting Close			
Richard Budden	18.00	Meeting Close			
Clare Cape	A	pologies			
Trevor Carbin	18.00	Meeting Close			
Daniel Cave		Absent			
Mary Champion	A	pologies			
Sam Charleston	18.00	Meeting Close			
Pauline Church	18.00	Meeting Close			
Ernie Clark	18.00	Meeting Close			
Richard Clewer	18.00	Meeting Close			
Zoë Clewer	Apologies				
Mark Connolly	Apologies				
Caroline Corbin	A	pologies			
Kevin Daley	1	Absent			
Brian Dalton	A	pologies			
Jane Davies	18.00	Meeting Close			
Andrew Davis	18.00	Meeting Close			
Matthew Dean	18.05	Meeting Close			
Dr Monica Devendran	A	pologies			
Nick Dye	1	Absent			
Adrian Foster	18.00	Meeting Close			
Sarah Gibson MP	A	pologies			
Gavin Grant	18.00	Meeting Close			
Howard Greenman	18.00	Meeting Close			
Ross Henning	18.00	Meeting Close			
Sven Hocking	18.00	Meeting Close			
Nick Holder	18.00	Meeting Close			
Ruth Hopkinson	18.00 Meeting Close				
Jon Hubbard	18.00 Meeting Close				
Peter Hutton	Apologies				
Tony Jackson	Apologies				

Mel Jacob	18.00	Meeting Close		
Simon Jacobs	18.00	Meeting Close		
	18.00	Meeting Close  Meeting Close		
George Jeans	18.05	Meeting Close  Meeting Close		
Johnny Kidney Carole King	18.00	Meeting Close  Meeting Close		
	18.00	<u> </u>		
Gordon King	18.00	Meeting Close		
Edward Kirk		Meeting Close		
Jerry Kunkler	18.00	Meeting Close		
Jacqui Lay		pologies		
Kathryn MacDermid		pologies		
Robert MacNaughton		Absent		
Dr Brian Mathew MP	18.00	Meeting Close		
Laura Mayes		pologies		
Dr Mark McClelland	18.00	Meeting Close		
Charles McGrath	18.00	Meeting Close		
Ian McLennan	18.00	Meeting Close		
Dominic Muns	18.00	Meeting Close		
Dr Nick Murry		pologies		
Nabil Najjar	18.00	Meeting Close		
Kelvin Nash		pologies		
Christopher Newbury	18.00	Meeting Close		
Ashley O'Neill	18.00	Meeting Close		
Jack Oatley	18.00	Meeting Close		
Paul Oatway QPM	18.00	Meeting Close		
Andrew Oliver	Apologies			
Stewart Palmen	18.00	Meeting Close		
Bill Parks	18.00	Meeting Close		
Sam Pearce-Kearney	18.00	Meeting Close		
Antonio Piazza	18.00	Meeting Close		
Tony Pickernell	18.00	Meeting Close		
Horace Prickett	18.00	Meeting Close		
Nic Puntis	18.00	Meeting Close		
Tamara Reay	18.00	Meeting Close		
Pip Ridout	18.00	Meeting Close		
Rich Rogers		Absent		
Ricky Rogers	18.00	Meeting Close		
Tom Rounds		Absent		
Paul Sample JP	18.30	Meeting Close		
Mike Sankey	18.00	Meeting Close		
Jonathon Seed	18.00	Meeting Close		
James Sheppard	18.00	Meeting Close		
Martin Smith	18.00	Meeting Close		
Caroline Thomas	18.00	Meeting Close		
Ian Thorn	18.00	Meeting Close		
Elizabeth Threlfall	18.00	Meeting Close		
Jo Trigg	18.00	Meeting Close		
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Tim Trimble	18.00 Meeting Close				
Mark Verbinnen	18.00 Meeting Close				
David Vigar	18.00 Meeting Close				
Iain Wallis	18.00 Meeting Close				
Derek Walters	Apologies				
Bridget Wayman	18.00 Meeting Close				
Stuart Wheeler	18.00 Meeting Close				
Philip Whitehead	Aj	pologies			
Suzanne Wickham	18.00 Meeting Close				
Christopher Williams	18.00 Meeting Close				
Graham Wright	18.00 Meeting Close				
Robert Yuill	Apologies				

# Agenda Item 5

**Wiltshire Council** 

**Full Council** 

**25 February 2025** 

# **Petitions Update**

# **Petitions Received**

As of 13 February 2025, there have been three new petitions received by Wiltshire Council since the last report to Council on 15 October 2024 which have reached the threshold to be reported to Council

These are detailed in the Appendix.

# **Proposal**

That Council notes this update on petitions.

Stuart Figini

**Senior Democratic Services Officer** 

Title	Date Received	Respondents	Action
Petition from resident of Trowbridge objecting the removal of a a tree on the corner of County Way and Roundstone Street, Trowbridge to be replaced by the installation of a crossing.	11 October 2024	825 Signatures	The following response was provided by a Principal Engineer Manager:  In accordance with our duties under S115 of the Environment Act 2021 and 96A of the Highways Act 1980, we have advertised that this street tree is being considered for removal. There is a notice affixed to the tree, as per requirements, outlining this. Consultation runs until 20th December and any interested parties may comment using the details set out below.  Following inspection, it has been found that crown lifting of the tree to ensure a minimum height clearance of 2.3m beneath branches overhanging the shared use path would significantly impact the health of the tree due to the nature of its low branch formation. In addition, realignment of the carriageway and footway adjacent to the tree will impact on the root zone.  Mitigation measures to reduce the impact and allow retention of the tree, including transplanting the tree and its root system, have been investigated but found not to be feasible.  To comment on this consultation, please email Integrated. Transport@wiltshire.gov.uk quoting the reference FHSF-WB001. Alternatively, you may write to Integrated Transport Team, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, BA14 8JN.

			Once the consultation has concluded, all comments will be considered by the Cabinet Member for Highways, Street Scene and Flooding, and a report outlining the responses to those comments and the decision to be taken regarding the tree felling will be published on the Council website and all respondents to the consultation notified.
e-petition received asking for a review of pedestrian safety in	21 October 2024	22 Signatures	The following response was provided by the Local Highways Area Manager:
Lacock, from Lacock Parish Council			The Highways Act 1980 places a duty upon us to remove obstructions from the public highway under Section 143. We are unable to be discretionary with regard to enforcement under this Act.
<del>Page 6</del>			Members of the public can apply for a Section 142 License under the Highways Act 1980 to place items, such as planters, on the public highway.
ω			With regard to highway safety, the parish council have been advised to apply to the Local Highway and Footway Improvement Group for any highway safety schemes.
e-petition received from a resident in Trowbridge asking the council to procure and install effective measures to mitigate flooding risk on the B3105 (Staverton Causeway) and B3107 (Holt-Melksham, Challeymead junction)	28 January 2025	48 signatures	This petition is still active and therefore an acknowledgement response has been sent to the lead petitioner.

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#### Wiltshire Council

#### **Full Council**

### **25 February 2025**

# **Treasury Management Strategy Statement 2025/26**

# **Executive Summary**

This report presents the Treasury Management Strategy for 2025/26 including:

- a) Prudential and Treasury Indicators for the next three years
- b) Debt management decisions required for 2025/26 that do not feature within the Prudential or Treasury Indicators (paragraphs 58 to 61)
- c) Minimum Revenue Provision Policy 2025/26
- d) Annual Investment Strategy for 2025/26

This report has been prepared in accordance with the updated CIPFA Codes of Practice (Treasury Management and Prudential) 2021 and relevant Guidance Notes. Any relevant changes within the code of practice have been reflected within the Treasury Management Strategy 2025/26.

# **Proposals**

That Council:

- a) Adopt the Minimum Revenue Provision Policy (paragraph 26 28)
- b) Adopt the Prudential and Treasury Indicators (paragraphs 17 25, 41 47 and Appendix A)
- c) Adopt the Annual Investment Strategy (paragraph 64 onwards).
- d) Delegate to the Corporate Director of Resources (S151 Officer) the authority to vary the amount of borrowing and other long-term liabilities within the Treasury Indicators for the Authorised Limit and the Operational Boundary
- e) Authorise the Corporate Director of Resources (S151 Officer) to agree the restructuring of existing long-term loans where savings are achievable or to enhance the long-term portfolio
- f) Agree that short term cash surpluses and deficits continue to be managed through temporary loans, deposits and money market funds
- g) Agree that any surplus cash balances not required to cover borrowing are placed in the most appropriate specified or non-specified investments, particularly where this is more cost effective than short term deposits; and delegate to the Corporate

Director of Resources (S151 Officer) the authority to select such funds

- h) Agree the Investment Policy (paragraph 68)
- i) Agree the Creditworthiness Policy (paragraph 72)
- j) Agree the Loans Policy (appendix F)

# **Reasons for Proposals**

To enable the Council to agree a Treasury Management Strategy for 2025/26 and set Prudential Indicators that comply with statutory guidance and reflect best practice.

Lucy Townsend - Chief Executive
Lizzie Watkin - Corporate Director of Resources (S151 Officer)

#### Wiltshire Council

#### **Full Council**

#### **25 February 2025**

# **Treasury Management Strategy Statement 2025/26**

# **Purpose**

1. This report recommends that Council approve the Prudential and Treasury Indicators, together with the Treasury Management Strategy for 2025/26.

# **Background**

- 2. The Council is required to operate a balanced budget. Part of the treasury management operation is to ensure that cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in appropriately risk assessed counterparties or instruments commensurate within the Council's risk appetite set out in the Strategy, providing adequate liquidity initially before considering investment return.
- 3. The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations. This management of longer-term cash may involve arranging long or short-term loans or using longer-term cash flow surpluses. On occasion, when it is prudent and economically advantageous, any debt previously drawn may be restructured to meet Council risk or cost objectives.
- 4. The contribution that the treasury management function makes to the Council is critical, as the balance of debt and investment operations ensure liquidity or the ability to meet spending commitments as they fall due, either on day to day revenue or for larger capital projects. The treasury operations will see a balance of the interest costs of debt and the investment income arising from cash deposits affecting the available budget. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal value will result in a loss to the funding available to the council and the General Fund Reserve, set aside to mitigate financial shocks.
- 5. CIPFA defines treasury management as:

"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of

the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

6. Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury activities, (arising usually from capital expenditure), and are separate from the day to day treasury management activities. Further details on non-financial investments are given in the Capital Strategy 2025/26.

# **Reporting Requirements - Capital Strategy**

- 7. The CIPFA 2021 Prudential and Treasury Management Codes require for all local authorities to prepare a Capital Strategy report, which will provide the following,
  - a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
  - an overview of how the associated risk is managed
  - the implications for future financial sustainability
- 8. The aim of the capital strategy is to ensure that members fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite. This report is included as part of the budget papers presented to Cabinet on 4 February 2025, and Full Council on 25 February 2025.

# Reporting Requirements - Treasury Management Reporting

- 9. Each year, the Council is required to receive and approve, as a minimum, three main reports, which incorporate a variety of policies, estimates and actuals:
  - a) Treasury Management Strategy Statement including prudential and treasury indicators, which covers the following,
    - the capital plans (including prudential indicators);
    - a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
    - the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
    - an investment strategy (the parameters on how investments are to be managed).
  - b) Mid-year Treasury Management Report, which will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.

c) Annual Treasury Report, which is an outturn position document that provides details of actual performance against a selection of prudential and treasury indicators and actual treasury operational performance compared to the estimates within the strategy for the financial year.

# **Treasury Management Strategy 2025/26**

10. The strategy for 2025/26 covers two main areas:

#### a) Capital Issues

- the capital expenditure plans and the associated prudential indicators;
- the minimum revenue provision (MRP) policy.

### b) Treasury Management Issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- the policy on use of external service providers.
- 11. These elements cover the requirements of the Local Government Act 2003, DLUHC Investment Guidance, DLUHC MRP Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code.

#### **Training**

- 12. The CIPFA Treasury Management Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny.
- 13. The training needs of treasury management officers are periodically reviewed. General treasury, and subject specific training is provided by the Council's treasury managers, which is attended by members of the treasury team. Opportunities for further officer development is considered during the year.

#### **Treasury Management Consultants**

14. The Council uses Link Group, Link Treasury Services Limited, as its external treasury management advisors.

- 15. The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers. All decisions will be undertaken with regards to all available information, including, but not solely, our treasury advisers.
- 16. It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented and subjected to regular review.

# Capital Prudential Indicators (2025/26 - 2027/28)

17. The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans are prudent, affordable and sustainable.

# **Capital Expenditure and Financing**

18. This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. The Capital Programme 2025/26 will be submitted to Cabinet and Council in February 2025. The estimates for future years are based on indicative figures, as part of the Capital Programme, and are therefore subject to change, both during the year and in future years in line with the budget monitoring of the Capital Programme, annual setting of the Capital Programme Budget and as new schemes are considered and approved by Cabinet and Council.

Capital Expenditure	2023/24 Actual £m	2024/25 Forecast £m	2025/26 Estimate £m	2026/27 Estimate £m	2027/28 Estimate £m
General Fund	102.694	140.191	182.885	147.363	92.771
Housing Revenue Account (HRA)	41.444	36.678	41.109	58.186	39.441
Commercial Activities/Non-financial investments*	19.583	17.567	16.518	4.119	0.141
Total	163.421	194.436	250.512	209.668	132.353

<sup>\*</sup> Commercial activities/non-financial investments relate to loans to Stone Circle.

19. The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of Capital Expenditure	2023/24 Actual £m	2024/25 Forecast £m	2025/26 Estimate £m	2026/27 Estimate £m	2027/28 Estimate £m
Capital Grants &	58.986	71.522	78.273	61.117	48.856
Contributions					
Capital Receipts	3.669	0.977	0.481	1.075	0.250
Revenue	2.217	5.559	9.280	0.597	0.000
Other (includes	4.727	14.247	28.988	11.309	0.100
CIL/S106					
contributions)					
HRA	33.042	12.308	18.717	20.563	12.329
Total Financing (non-	102.641	104.613	135.739	94.661	61.535
borrowing)					
Net Financing Need –	60.781	65.453	92.381	77.384	43.706
General Fund					
Net Financing Need –	15.902	24.370	22.392	37.623	27.112
HRA					
Total Net Financing	76.683	89.823	114.773	115.007	70.818
Need (Borrowing)					
Total Capital	163.421	194.436	250.512	209.668	132.353
Expenditure					

#### The Council's Borrowing Need (the Capital Financing Requirement)

- 20. The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so its underlying borrowing need. Any capital expenditure which has not immediately been paid for, through a revenue or capital resources, will increase the CFR.
- 21. The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with the asset life, and so charges the economic consumption of capital assets as they are used.
- 22. The CFR includes any other long-term liabilities (e.g. PFI schemes, finance leases). While these increase the CFR, and therefore the Council's borrowing requirement, these types of schemes include a borrowing facility by the lease/PFI provider, and so the Council is not required to separately borrow for these schemes. The Council

currently has £49.309m of such schemes within the CFR. The CFR projections are summarised in the table below,

	2023/24 Actual	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate	2027/28 Estimate
	£m	£m	£m	£m	£m
CFR – General Fund	562.736	603.871	668.416	713.491	720.899
CFR – HRA	114.767	131.137	153.529	191.151	218.264
Total CFR	677.503	753.007	821.945	904.642	939.163
Movement in CFR	57.174	57.505	86.937	82.697	34.521
Represented by					
Net Financing Need - GF	60.781	65.453	92.381	77.384	43.706
Net Financing Need –	15.902	24.370	22.392	37.623	27.112
HRA					
Less MRP/VRP	(15.795)	(20.260)	(23.778)	(28.252)	(32.239)
Less Other Long Term	(3.711)	(4.058)	(4.058)	(4.058)	(4.058)
Liabilities (PFI)					
Less Other Financing	0.000	(8.000)	0.000	0.000	0.000
Movements (incHRA)					
Movement in CFR	57.174	57.505	86.937	82.697	34.521

### **Liability Benchmark**

- 23. The council is required to estimate and measure the liability benchmark for the forthcoming financial year and the following two financial years, as a minimum.
- 24. There are four components to the Liability Benchmark.
  - I. Existing Loan Debt Outstanding the Council's existing loans that are still outstanding in future years
  - II. Loans CFR this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing and planned MRP.
  - III. Net Loans Requirement this will show the Council's gross loan debt less treasury management investments at the last financial year end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cashflows forecast.
  - IV. Liability Benchmark (or gross loans requirement) this equals net loans requirement plus short term liquidity allowance

	Opening Balances £m	2024/25 Estimate £m	2025/26 Estimate £m	2026/27 Estimat e £m	2027/28 Estimat e £m
PWLB Loans	322.123	312.123	302.000	292.000	262.000
LOBO Loans	36.000	36.000	36.000	36.000	36.000
Market Loans	25.172	23.541	22.014	21.000	21.000
Existing Loan Debt	383.295	371.664	360.014	351.000	319.000
Opening Loan Debt	383.295				
Less: Opening Treasury Investments	(112.056)				
Plus: Planned Borrowing		89.823	114.773	115.007	70.818
Less: MRP and Capital Receipt Set Aside		(20.260)	(23.778)	(28.252)	(32.239)
Adj: Other Forecast Cashflows		(4.058)	(4.058)	(4.058)	(4.058)
Net Loans Requirement	271.239	336.744	423.681	506.378	540.899
Opening Loans CFR	677.503				
Plus: Planned		00.000	444770	445.007	70.040
Borrowing		89.823	114.773	115.007	70.818
Less: MRP and Capital Receipts Set					
Aside		(20.260)	(23.778)	(28.252)	(32.239)
Loans CFR	677.503	747.066	838.061	924.816	963.395
	0111000	1 111000	000.001	02 110 10	000.000
Liquidity Allowance above Net Debt					
(Liquidity Buffer)	112.056	100.000	100.000	100.000	100.000
Liability Benchmark					
(Gross Loans					
Requirement)	383.295	436.744	523.681	606.378	640.899
Forecast Investments	112.056	100.000	100.000	100.000	100.000
(Over)/Under Liability Benchmark	0.000	65.080	163.667	255.378	321.899

25. Years where actual loans are less than the benchmark indicate a future borrowing requirement; any years where actual loans outstanding exceed the benchmark represent an overborrowed position, which will result in excess cash requiring investment.

## Minimum Revenue Provision (MRP) Policy Statement

- 26. The minimum revenue provision (MRP) is the amount set aside for the repayment of the debt as a result of borrowings made to finance capital expenditure.
- 27. The Council is required to calculate a prudent provision of MRP which ensures that the outstanding debt liability is repaid over a period that is reasonable commensurate with that over which the capital expenditure provides benefits. The Council is also allowed to undertake additional voluntary revenue payments (VRP) if appropriate.
- 28. Regulations have been issued which require full Council to approve an MRP statement in advance of each year. The following MRP policy (section a to d) was approved in October 2017 following a full review. It is recommended that Council approves the same MRP policy for 2025/26, as follows:
  - a) MRP for capital expenditure incurred wholly or partly by prudential borrowing or credit arrangements: equal Instalments to be determined by reference to the expected life of the asset. Asset life is deemed to begin once the asset becomes operational. MRP will commence from the financial year following the one in which the asset becomes operational.
  - b) MRP in respect of prudential borrowing: equal Instalments taken to meet expenditure, which is treated as capital expenditure by virtue of either a capitalisation direction or regulations, will be determined in accordance with the asset life method as recommended by the statutory guidance.
  - c) The Council retains the right to make additional voluntary payments to reduce the CFR if deemed prudent.
  - d) In general, where the Council issues capital loans to third parties (including to its own commercial companies), the expectation is that the funds lent will be repaid in full at a future date. Therefore, no MRP will set aside in respect of these loans.
  - e) MRP will however need to be applied as appropriate if it is determined at any point that any such loan will not be re-paid in full. The position of each loan will be reviewed on an annual basis by the Section 151 Officer.

#### **Borrowing**

29. The capital expenditure plans set out in paragraph 18 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury/prudential indicators, the current and projected debt positions and the annual investment strategy.

#### **Current Portfolio Position**

30. The overall treasury management portfolio as at 31 March 2024 and for the position as at 31 December 2024 are shown below for both borrowing and investments.

	Treasury P	ortfolio		
	Actual 31/03/2024	Actual 31/03/2024	Current 31/12/2024	Current 31/12/2024
	£m	%	£m	%
Treasury Investments				
Banks	10.000	8.92	9.980	18.17
Local Authorities	22.000	19.63	0.000	0.00
Money Market Funds	60.056	53.60	24.952	45.42
Property Fund	20.000	17.85	20.000	36.41
Total Treasury Investments	112.056	100.00	54.932	100.00
Treasury Borrowing				
PWLB	322.123	84.04	320.123	84.25
Market Loans	57.000	14.87	57.000	15.00
Salix	4.172	1.09	2.843	0.75
Total External Borrowing	383.295	100.00	379.966	100.00
Net Treasury Investments/	(271.239)		(325.034)	
(Borrowing)				

31. The Council's forward projections for borrowing are summarised in the tables below. These tables show the actual external gross debt, against the underlying capital borrowing need (the CFR), highlighting any over or under borrowing, for both the general fund and the HRA.

External Debt	2023/24	2024/25	2025/26	2026/27	2027/28
General Fund	Actual	Estimate	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m
Debt at 1 April	309.295	305.295	373.117	463.971	540.301

Actual/Estimated	(4.000)	63.822	90.854	76.330	43.706
Change in Debt					
Debt at 31 March	305.295	373.117	463.971	540.301	584.007
CFR	562.736	603.871	668.416	713.491	720.899
PFI Liability	54.817	49.309	45.251	41.193	37.134
Under/ (Over)	202.624	181.445	159.194	131.997	99.758
Borrowing					

External Debt	2023/24	2024/25	2025/26	2026/27	2027/28
HRA	Actual	Estimate	Estimate	Estimate	Estimate
	£m	£m	£m	£m	£m
Debt at 1 April	86.000	78.000	94.370	116.762	154.385
Actual/Estimated	(8.000)	16.370	22.392	37.623	27.112
Change in Debt					
Debt at 31 March	78.000	94.370	116.762	154.385	181.497
CFR	114.767	131.137	153.529	191.151	218.264
Under/ (Over)	36.767	36.767	36.767	36.767	36.767
Borrowing					

- 32. Within the range of prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2025/26 and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue or speculative purposes, in advance of need.
- 33. The Corporate Director of Resources (S151 Officer) confirms that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This takes into account current commitments, existing plans, and the proposals in this report.

## **Stone Circle**

34. Included in the planned capital programme are loans made to Stone Circle. The amounts are as follows.

Loans to Stone Circle	2023/24 Actual £m	2024/25 Estimate £m	2025/26 Estimate £m	2026/27 Estimate £m	2027/28 Estimate £m
In year Capital	21.199	17.567	16.519	4.119	0.141

Expenditure					
Cumulative Year End	45.492	63.059	79.578	83.697	83.838
Loan Balance					

- 35. The Stone Circle loans have been funded entirely by borrowing, which will be funded by revenue savings generated through financial returns from the company, through mark up on the loans and through future dividends.
- 36. Borrowing undertaken to fund capital expenditure, including the loans to Stone Circle, is owned and financed by the Council, regardless of whether any income is received from third party investments. This creates additional credit risk for the Council.
- 37. The overall exposure from Stone Circle is limited to decisions already taken and agreed by full council (23 July 2019 minute number 108 headed "Establishing local authority companies"), this includes the authority to borrow to support the programme.
- 38. As per the agreed policy, MRP is being applied to some of this capital expenditure, as the business plan could not give the assurance necessary that the loan would be repaid in full.
- 39. Some of the debt, however, is backed by the value of the Stone Circle assets. If the Stone Circle companies and the arrangement with them needs to be unwound, the Stone Circle assets would transfer to the Council; as assets of a wholly owned Council company, their value would be used to repay the remainder of outstanding debt.
- 40. Any changes will be reported to cabinet and full council at the earliest opportunity.

#### Treasury Indicators: Limits to Borrowing Activity

#### **Operational Boundary**

- 41. The operational boundary is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under borrowing by other cash resources.
- 42. The operational boundary is based on a prudent estimate of the most likely maximum level of external borrowing for both capital expenditure and cash flow purposes, which is consistent with other budget proposals. The basis of the calculation for HRA borrowing 2025/26 is the HRA CFR.

Operational Boundary	2024/25 £m	2025/26 £m	2026/27 £m	2027/28 £m
General Fund Debt	689.907	692.474	737.548	744.959
HRA Debt	114.322	153.528	191.151	218.263

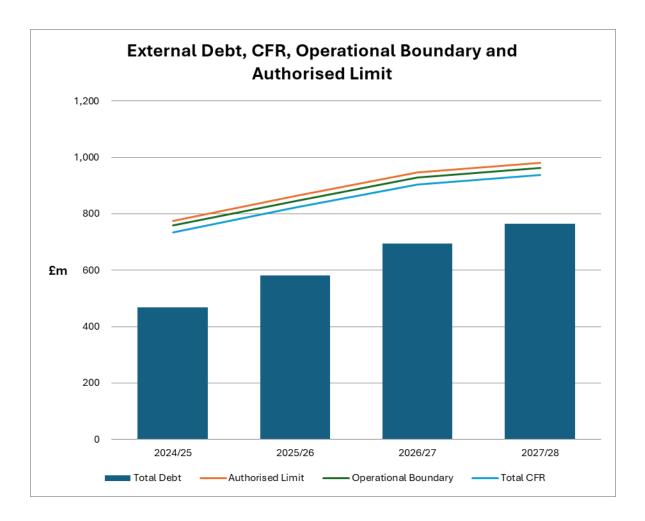
Operational Boundary 804.229 846.002 928.699 963.2
--

#### **Authorised Limit for External Debt**

- 43. The authorised limit for debt is a key indicator which represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by Full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.
- 44. The authorised limit is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.
- 45. The authorised limit is the operational boundary, including an allowance for unplanned and irregular cash movements. It is proposed that an allowance of 2.5% is continued for General Fund borrowing for 2025/26 to 2027/28, but this will be kept under review. The allowance provides for the possibility of additional borrowing during the year as a result of Government support for further schemes and provides headroom where the projection proves too optimistic (payments made earlier or receipt of income delayed against that forecast).
- 46. There is no allowance in respect of HRA borrowing, so it has been decided that this borrowing should not exceed the CFR.

	2024/25	2025/26	2026/27	2027/28
Authorised Limit	£m	£m	£m	£m
General Fund Debt	707.155	709.786	755.987	763.583
HRA Debt	114.322	153.528	191.151	218.263
Authorised Limit	821.477	863.314	947.138	981.846

47. The following bar/line graph shows external debt against the CFR, operation boundary and authorised limit.



#### Monitoring and Reporting of the Prudential Indicators

48. Progress will be monitored throughout the year, particularly against the two borrowing limits (operational boundary and authorised limit) above. Cabinet will be kept informed of any issues that arise, including potential or actual breaches.

#### **Borrowing Strategy**

- 49. The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need, (the CFR) has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow have been used as a temporary measure (internal borrowing).
- 50. This strategy is prudent, as medium and longer dated borrowing rates are expected to fall from their current levels once prevailing higher inflation rates are addressed by the Bank of England monetary policy.
- 51. Against this background and the risks within the economic forecast, caution will be adopted with the 2025/26 treasury operations. The Corporate Director of Resources (S151 Officer) will, through delegation and reporting, monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

- a) if it was considered that there was a significant risk of a sharp fall in borrowing rates, then long-term borrowing will be postponed.
- b) if it was considered that there was a significant risk of a much sharper rise in borrowing rates than that currently forecast, fixed rate funding may be drawn whilst interest rates are lower than they are projected to be in the next few years.
- 52. Any decisions will be reported to Cabinet within the next treasury report as part of the treasury management reporting cycle.

## Rate and Timing of Borrowing

- 53. In 2025/26 two PWLB loans will mature and become repayable as follows:
  - £0.123m in December 2025 (General Fund) at a rate of 4.875%
  - £10m in March 2026 (HRA) at a rate of 2.92%
- 54. These loans may be refinanced depending on the Council's overall internal borrowing position, and the nature of the current economic climate.
- 55. The timing of any borrowing is crucial in terms of interest rates and the potential to minimise interest costs. Prior to any actual borrowing the treasury team will, in conjunction with our treasury advisers, proactively manage the interest rate position, using all information available to inform the borrowing decision.
- 56. It is not always possible to obtain the lowest rates of interest, as there is a risk that unforeseen events can significantly alter the level of rates, however, ongoing active monitoring of rates and forecasts will mitigate against this risk.
- 57. Temporary loans, where both the borrower and lender have the option to redeem the loan within twelve months, are used to offset short term revenue cash deficits. They may also be used to cover short term cashflow requirements until longer term loans become more cost effective. The majority of these loans will be at fixed interest rates, maturing on specific dates. The strategy is that the Council shall utilise temporary loans for any short-term cash deficits that arise in respect of revenue and/or capital.

#### Policy on Borrowing in Advance of Need

58. The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and

- will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 59. Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

## **Debt Rescheduling**

- 60. Rescheduling of current borrowing within the current debt portfolio may be considered whilst premature redemption rates remain elevated, but only if there is surplus cash available to facilitate any repayment, or rebalancing of the portfolio to provide more certainty is considered appropriate.
- 61. Any rescheduling will be reported to members within the next treasury report as part of the treasury management reporting cycle.

#### **Sources of Borrowing**

- 62. Currently the PWLB certainty rate is set at gilts plus 80 basis points. However, consideration may still need to be given to funding from the following sources for the following reasons:
  - a) Local Authorities Primarily shorter dated maturities out to 3 years or so, as this is generally cheaper than the certainty rate
  - b) Financial Institutions Primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid the 'cost of carry' or to achieve refinancing certainty over the next few years
- 63. Our advisors will keep the Council informed as to the relative merits of each of these alternative funding sources.

#### **Annual Investment Strategy**

#### **Investment Policy – Management of Risk**

- 64. DLUHC and CIPFA have extended the meaning of investments to include both financial and non-financial investments. This report deals solely with financial investments, (managed by the treasury management team). Non-financial investments, i.e. the purchase of income yielding assets, are covered in the Capital Strategy.
- 65. Council's investment policy has regard to the following:
  - DLUHC Guidance on Local Government Investments ("the Guidance")

- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ("the Code").
- CIPFA Treasury Management Guidance Notes 2021.
- 66. The Council's investment priorities will be security first, portfolio liquidity second, then yield (return). The Council will aim to achieve the optimum return on its investments commensurate with proper levels of security and liquidity and with regard to the Council's risk appetite.
- 67. In the current economic climate, it is considered appropriate to maintain a degree of liquidity to cover cash flow needs but to also consider 'laddering' investments (ie. staggering the maturity dates) for periods up to 12 months with high credit rated financial institutions, whilst investment rates remain elevated, as well as wider range fund options.
- 68. The above guidance from the MHCLG and CIPFA place a high priority on the management of risk. The Council has adopted a prudent approach to managing risk and defines its risk appetite by the following means,
  - a) Minimum acceptable credit criteria are applied in order to generate a list of highly creditworthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short term and long-term ratings.
  - b) Other information ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To achieve this consideration the Council will engage with its advisors to maintain a monitor on market pricing such as credit default swaps and overlay that information on top of the credit ratings.
  - c) Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
  - d) The Council has defined the list of types of investment instruments that the treasury management team are authorised to use. There are two lists in Appendix B under the categories of 'specified' and 'non-specified' investments.
    - Specified Investments are those with a high level of credit quality and subject to a maturity limit of one year. Or have less than one year to run

- until maturity, if originally they were classified as being non-specified investments solely due to the maturity period exceeding one year.
- ii. Non-specified investments are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.
- e) Non-specified investments limit. The Council has determined that it will limit the maximum total exposure to non-specified investments to be £30m, in line with the limits for investments for longer than 365 days.
- f) Lending Limits, (amounts and maturity) for each counterparty will be set through applying the matrix in paragraph 73 and 77.
- g) The Council will set a limit for the amount of its investments which are invested for longer than 365 days (see paragraph 91)
- h) Investments will only be placed with counterparties from countries with a specified minimum sovereign rating (see paragraph 79)
- i) The Council has engaged external consultants (see paragraphs 14 16) to provide expert advice on how to optimise an appropriate balance on security, liquidity and yield, given the risk appetite of the Council in the context of the expected level of cash balances and need for liquidity throughout the year.
- j) All investments will be denominated in sterling.
- k) As a result of the change in accounting standards for 2023/24 under IFRS 9, the Council will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. The temporary override to IFRS 9 has been extended until 31 March 2025.
- 69. The Council will also pursue value for money in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance (see paragraph 92). Regular monitoring of investment performance will be carried out during the year.

#### **Third Party Loans**

70. The Council has the power to lend monies to third parties. Appendix F sets out the Council's framework within which it may consider advancing loans to third party organisations. The policy was revised, and agreed as part of the mid-year treasury

review, to include loans awarded from the Growing Place Infrastructure Fund. This revised policy has been reviewed by officers, who have concluded that it is still relevant and fit for purpose.

#### Changes in Investment Policy from 2024/25

71. No changes have been made to the investment policy from the previous year.

# **Creditworthiness Policy**

- 72. The Council applies the creditworthiness service provided by Link. This service employs a sophisticated modelling approach, utilising credit ratings from the three main credit rating agencies Fitch, Moodys and Standard & Poors. The credit ratings of counterparties are supplemented with the following overlays:
  - Watches and outlooks from credit rating agencies;
  - CDS spreads to give early warning of likely changes in credit ratings;
  - Sovereign ratings to select counterparties from only the most creditworthy countries.
- 73. The above modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following durational bands:

Colour	Maximum Investment
Yellow	5 years
Dark Pink	5 years (for ultra-short dated bond funds with a credit score of
	1.25)
Light Pink	5 years (for ultra-short dated bond funds with a credit score of
	1.5)
Purple	2 years
Blue	1 year (only applies to nationalised or semi nationalised UK
	banks)
Orange	1 year
Red	6 months
Green	100 days
No colour	not to be used

74. The Link creditworthiness service uses a wider array of information other than just primary ratings. Furthermore, by using a risk weighted scoring system, it does not give undue preponderance to just one agency's ratings.

- 75. All credit ratings will be monitored daily. The Council is alerted to changes to ratings of all three agencies through its use of the Link creditworthiness service.
  - If a downgrade results in the counterparty/investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
  - In addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a daily basis via its Passport website, provided exclusively to it by Link Asset Services. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
- 76. Sole reliance will not be placed on the use of this external service. In addition, the Council will also use market data and market information, information on any external support for banks to help support its decision making process.
- 77. In addition to the above creditworthiness criteria, the following limits will be applied to the total cumulative investments placed with an individual institution (or group of institutions where there is common ownership):

<b>Monetary Limit</b>	Counterparties
Up to £30 m	Money Market Funds
Up to £15 m	Counterparties on the Link credit list with the following colour
	code,
	Orange – 12 months
	Blue – 12 months
	Purple – 24 months
	Multilateral development banks
	Local authorities and other public bodies
Up to £10 m	Counterparties on the Link credit list with the following colour
	code,
	Red – 6 months
	Green – 100 days
	UK Building societies
	Government backed overseas banks and their subsidiaries
	HSBC (for balances within the bank account, held on an
	overnight basis - to differentiate from above bank limit for
	fixed term deposits)

#### Changes in Creditworthiness Policy from 2024/25

78. No changes have been made to the creditworthiness policy from the previous year.

#### **Other Limits**

- 79. Due care will be taken to consider the exposure of the Council's total investment portfolio to non-specified investments, countries, groups and sectors.
  - a. Non-specified investment limit. The Council has determined that it will limit the maximum total exposure to non-specified investments as being £30m.
  - b. Country limit. The Council has determined that it will only use approved counterparties from the UK and countries with a minimum sovereign credit rating of AA- from Fitch (or equivalent). The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix C. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.
  - c. Other limits. Limits in place above will apply to a group of counterparties.

## **Investment Strategy**

- 80. Investments will be made with reference to the core balance and cash flow requirements and the outlook for short term interest rates (i.e. rates for investments up to 12 months)
- 81. Greater returns are usually obtainable by investing for longer periods, so while most cash balances are required to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the potential value from longer term investments will be carefully assessed.

#### **Investment Returns Expectations**

- 82. The current expectation forecasts bank rate to fall to a low of 3.5%.
- 83. The suggested budgeted investment earnings rates for returns on investments places for periods up to about 3 months during each financial year are as follows,

Year	Budgeted Earnings Rate
2024/25	4.60%
2025/26	4.10%
2026/27	3.70%
2027/28	3.50%
2028/29	3.50%
Years 6 – 10	3.50%
Year 10 +	3.50%

84. As there are so many variables at this time, caution must be exercised in respect of all interest rate forecasts.

85. Given the above, for its cashflow generated balances, the treasury officers will seek to utilise the money market funds and short dated deposits (overnight to 100 days), in order to benefit from the compounding of interest.

## **Environmental, Social and Governance (ESG) Investments**

- 86. ESG Investments are becoming more a commonplace discussion within the wider investment community, including Local Authorities.
- 87. Our treasury advisors have clarified that the most important issue is ensuring that there is a clear understanding of the ESG risks that the Council is exposed to and evaluating how well it manages these risks
- 88. In terms of ESG risks, Governance needs to be the most important one when considering treasury investments. This is because poor governance can have a more immediate impact on the financial circumstances of an entity and the potential for a default event that would impact the amount the local authorities receive back from their investments. Those financial institutions that are viewed as having poor/weak corporate governance are generally less well rated in the first instance or have a higher propensity for being subject to negative rating action. So, this element of ESG is of high importance to the Council, as we follow investment guidance with the security, liquidity and yield principle at the core.
- 89. As highlighted above, there are already touchpoints with the Council's investment strategy, including the incorporation of ESG metrics into credit rating agency assessments. There are also a small, but growing number of financial institutions and fund managers promoting "ESG" products (short term cash investments), which the Council may able to utilise, whilst maintaining the critical principles of security, liquidity and yield.

## **Investment Treasury Indicator and Limit**

- 90. This investment treasury indicator limits the total funds invested for greater than 365 days. These limits are set with regard to the Council's liquidity requirements and to reduce the need for any unnecessary borrowing. They are based on the availability of funds after each year end.
- 91. The Council is asked to approve the treasury indicator and limit:

Upper Limit for Principal Sums Invested for longer than 365 days			
	2025/26	2026/27	2027/28
Limit for Principal sums invested for	£30m	£30m	£30m

longer than 365 days			
Current Investments as at 31/12/24 in	£0m	£0m	£0m
excess of 365 days maturing in each			
year			

## **Investment Risk Benchmarking**

92. The Council will use an investment benchmark to assess the investment performance of its investment portfolio of the relevant SONIA (Sterling Overnight Index Average) rate dependant on the average duration of the fund.

## **End of Year Investment Report**

93. At the end of the financial year, the Council will report on its investment activity as part of its Annual Treasury Report.

#### **Overview and Scrutiny Engagement**

94. The Financial Planning Task Group will consider this report on 30 January 2025, with any comments reported to the Cabinet meeting.

# **Safeguarding Implications**

95. None have been identified as arising directly from this report.

#### **Public Health Implications**

96. None have been identified as arising directly from this report.

## **Procurement Implications**

97. None have been identified as arising directly from this report.

## **Equalities Impact of the Proposal**

98. None have been identified as arising directly from this report.

#### **Environmental and Climate Change Considerations**

- 99. Wiltshire Council will not intentionally invest in any investment that is not ethical and would not be consistent with our environmental and social policy objectives.
- 100. Where appropriate, the Council will consider investments that deliver environmental and social benefits, whilst maintaining our Security, Liquidity and Yield criteria.

## **Workforce Implications**

101. There are no workforce implications that have been identified as arising directly from this report. The staff who work in the Treasury Management function will all be required to undertake training to ensure their knowledge and experience remains relevant and up to date.

#### Risks Assessment

- 102. The primary treasury management risks to which the Council is exposed are adverse movements in interest rates and the credit risk of its investment counterparties.
- 103. The Prudential & Capital Indicators and the Annual Investment Strategy take account of the forecast movement in interest rates and allow sufficient flexibility to be varied if actual movements in interest rates are not in line with the forecast.
- 104. Link's long-term forecast (beyond 10 years) for Bank Rate stands at 3.50%. As all PWLB certainty rates are now above this level, borrowing strategies will need to be reviewed in that context. Better value can generally be obtained for shorter dates (both PWLB and local authority to local authority borrowing).
- 105. While the Council will not be able to avoid borrowing to finance new capital expenditure in the future, or to replace maturing debt, there will be a cost of carry (the difference between higher borrowing costs and lower investment returns), to any new short or medium term borrowing that causes a temporary increase in cash balances, and this position will, most likely, incur a revenue cost.

## **Financial Implications**

- 106. Capital Programme figures included within this report are based on the Capital Programme budget that forms part of the overall budget setting for the council. The capital budget for 2025/26 is higher than the value of programme that has been delivered in previous years. If programme delivery is in line with previous years, using the capital programme figures has the effect of overstating some of the estimated figures in the report, such as the Capital Financing Requirement and the underborrowed position of the council.
- 107. Other financial implications have been examined and are implicit throughout the report.

## **Legal Implications**

108. None have been identified as arising directly from this report.

#### **Options Considered**

- 109. Future consideration will be given to alternative borrowing and investment options to improve the cost effectiveness of and return on treasury activities for the Council.
- 110. The options in relation to the revenue and capital budgets in these proposals are fully consistent with the figures included within the budget considerations.

#### **Conclusions**

111. This strategy statement supports effective decision making and ensures a sound financial framework and control environment.

## Lizzie Watkin - Corporate Director of Resources (S151 Officer)

Report Author: Debbie Price, Principal Accountant, email: debbie.price@wiltshire.gov.uk

## **Appendices**

Appendix A Prudential and Treasury Indicators 2023/24 - 2025/26

Appendix B Specified and non-specified Investments

Appendix C Approved countries for investments

Appendix D Treasury Management Scheme of Delegation

Appendix E Role of the Section 151 Officer

Appendix F Third Party Loans Policy

#### **Background Papers**

None

## Capital Prudential and Treasury Indicators for 2025/26 - 2027/28

1. The Prudential and Treasury Management Codes and Treasury Guidelines require the Council to set a number of Prudential and Treasury Indicators for the financial year ahead. This appendix sets out the indicators required by the latest code.

# **Affordability Prudential Indicators**

2. The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators,

#### Ratio of Financing Costs to Net Revenue Stream

3. This indicator identifies the trend in the cost of capital (borrowing and other long-term obligation costs net of investment income) against the net revenue stream.

	2023/24 Actual	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate	2027/28 Estimate
	(%)	(%)	(%)	(%)	(%)
General Fund	4.07	5.10	6.05	6.89	7.14
HRA	10.00	8.32	11.68	15.05	19.51

4. The estimates in financing costs above include current commitments and the proposals in this budget report.

## **Maturity Structure of Borrowing**

- 5. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing and are required for upper and lower limits.
- In order to protect the Council from interest rate risk and to safeguard the continuity
  of treasury management financing costs, the following limits have been adopted.
  This sets out the structure of our debt portfolio and limits the exposure to changes
  in interest rates.

Maturity Structure of Fixed Interest Rate Borrowing 2025/26			
	Lower (%)	Upper (%)	
Under 12 months	0	25	
12 months to 2 years	0	25	
2 years to 5 years	0	45	
5 years to 10 years	0	75	
10 years and above	0	100	

7. In addition to the indicators (above) it is considered prudent that, under normal circumstances, no more than 15% of long term loans, excluding LOBO loans, should fall due for repayment within any one financial year and 25% in the case of LOBO loans, where maturity is deemed to be the "next call option date".

# Treasury Management Practice (TMP) 1 Credit and Counterparty Risk Management

# **Specified Investments.**

- 1. All such investments will be sterling denominated, with maturities up to a maximum of 1 year, meeting the minimum 'high' quality criteria.
- 2. Counterparty monetary limits are included in the table at paragraph 77 of the main report. Any not included here are detailed in the table below (paragraph 6)

## Non-Specified Investments.

- 3. These are any investments which do not meet the specified investment criteria.
- 4. A maximum of £30 m will be held in aggregate non-specified investments.

# **Credit and Counterparty Risk**

- 5. A variety of instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made, it will fall into one of the above categories.
- 6. The criteria applying to institutions or investment vehicles are as follows,

	Minimum credit criteria/ colour band	Maximum maturity period	Individual Institution Counterparty Limit
Specified Investments			
DMADF – UK	Yellow	6 months	£30m
Government		(set by the	
		DMO)	
UK Government Gilts	Yellow	12 months	£30m
UK Government Treasury	Yellow	364 days	£30m
Bills		(set by the	
		DMO)	
Bonds issued by	Yellow	6 months	Included in para
multilateral development			76
banks			
Money Market Funds	AAA	Liquid	Included in para
CNAV			76
Money Market Funds	AAA	Liquid	Included in para
LVNAV			76

Money Market Funds	AAA	Liquid	Included in para
VNAV			76
Ultra Short Dated Bonds	AAA		£10m
(1.25)			
Ultra Short Dated Bonds	AAA		£10m
(1.5)			
Local Authorities	Yellow	12 months	Included in para
			76
Term Deposits with Banks	Blue	12 months	Included in para
and Building Societies	Orange	12 months	76
	Red	6 months	
	Green	100 days	
	No Colour	Not for use	
Certificates of Deposit or	Blue	12 months	£10m
Corporate Bonds	Orange	12 months	
	Red	6 months	
	Green	100 days	
	No Colour	Not for use	
Non-Specified Investment	ts		
Term Deposits with Banks	Purple	2 years	Included in para
and Building Societies	Yellow	5 years	76
UK Government Gilts	UK sovereign	5 years	Up to aggregate
	rating		value of non-
Property Fund (CCLA)	N/A	N/A	specified
Property Funds	N/A	N/A	investments
			(currently £30m)

7. The criteria in this appendix are intended to be the operational criteria in normal times. At times of heightened volatility, risk and concern in financial markets, this strategy may be amended by temporary operational criteria further limiting investments to counterparties of a higher creditworthiness and/or restricted time limits.

## Accounting treatment of investments.

8. The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

# **Monitoring of Investment Counterparties**

9. The credit rating of counterparties will be monitored regularly. The Council receives credit rating information from Link as and when ratings change, and counterparties are checked promptly. On occasion, ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately, and if required new counterparties which meet the criteria will be added to the list.

# **Approved Countries for Investments**

This list is based on those countries which have sovereign ratings of AA- or higher (the lowest rating from Fitch, Moody's and S&P is shown) and also, (except - at the time of writing - for Hong Kong and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link credit worthiness service (based on ratings as at 25/11/24)

Rating	Country
AAA	Australia
	Denmark
	Germany
	Netherlands
	Norway
	Singapore
	Sweden
	Switzerland
AA+	Canada
	Finland
	U.S.A.
AA	Abu Dhabi (UAE)
	Qatar
AA-	Belgium
	France
	UK

## **Treasury Management Scheme of Delegation**

#### **Full Council**

- 1. Receiving and reviewing reports on treasury management policies, practices and activities;
- 2. Budget consideration and approval;
- 3. Approval of annual strategy.

#### Cabinet

- 1. Approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- 2. Budget consideration and proposal;
- 3. Approval of the division of responsibilities;
- 4. Receiving and reviewing regular monitoring reports and acting on recommendations;

# Scrutiny - Finance PlanningTask Group

- 1. Reviewing the treasury management policy and procedures and making recommendations to the responsible body.
- 2. Scrutinise the Treasury Management Mid-Year Reports and Outturn Reports that set out the financial performance against indicators set.

# The Treasury Management Role of the Section 151 Officer

- 1. Recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- 2. Submitting regular treasury management policy reports;
- 3. Submitting budgets and budget variations;
- 4. Receiving and reviewing management information reports;
- 5. Reviewing the performance of the treasury management function;
- 6. Ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- 7. Ensuring the adequacy of internal audit, and liaising with external audit;
- 8. Approving the selection of external service providers and agreeing terms of the appointment.
- Preparation of a capital strategy to include capital expenditure, capital financing, non-financial investments and treasury management, with a long term timeframe.
- 10. Ensuring that the capital strategy is sustainable, affordable and prudent in the long term and provides value for money
- 11. Ensuring that due diligence has been carried out on all treasury and nonfinancial investments and is in accordance with the risk appetite of the Council
- 12. Ensuring that the Council has appropriate legal powers to undertake expenditure on non-financial assets and their financing (with advice from the Monitoring officer)
- 13. Ensuring the proportionality of all investments so that the Council does not undertake a level of investing which exposes the Council to an excessive level of risk compared to its financial resources
- 14. Ensuring that an adequate governance process is in place for the approval, monitoring and ongoing risk management of all non-financial investments and long term liabilities

- 15. Provision to members of a schedule of all non-treasury investments including material investments in subsidiaries, joint ventures, loans and financial guarantees
- 16. Ensuring that members are adequately informed and understand the risk exposures taken on by the Council
- 17. Ensuring that the Council has adequate expertise, either in house or externally provided, to carry out the above
- 18. Creation of Treasury Management Practices which specifically deal with how non-treasury investments will be carried out and managed.

## **Appendix F - Third Party Loans Policy**

- 1. Government changes in the way councils are funded has prompted local authorities to look at more innovative ways of supporting Business Plan priorities.
- 2. The primary aims of any investment, in order of priority, are the security of its capital, liquidity of its capital and to obtain a return on its capital commensurate with levels of security and liquidity. These aims are crucial in determining whether to proceed with a potential loan.
- 3. Whilst the Council does not wish to become a commercial lender in the market place it can use its ability to borrow, at relatively economic rates, to support the delivery of improved outcomes for the residents of Wiltshire. At the same time this will facilitate the creation of a relatively modest income stream to support the Council's overall financial resilience. All third party loans must demonstrate alignment to the Council's core objectives and priorities.
- 4. The intention of this policy is therefore to establish a framework within which the Council may consider advancing loans to third party organisations.

# Types of Loan

# **Loans Defined as Capital Expenditure**

- 5. The acquisition of share capital or loan capital in any corporate body is defined as capital expenditure under Regulation 25(1) (d) of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003.
- 6. A loan, grant or financial assistance provided by this Council to another body will be treated as capital expenditure if the Council would define the other bodies use of those funds as capital had it undertaken the expenditure itself.
- 7. Loans of this nature will be included in the Council's approved capital programme.
- 8. The Council's Minimum Revenue Provision (MRP) Policy sets out the MRP requirements in respect of capital loans.

#### Other Loans

9. Other loans refers to loans that do not meet the definitions of capital expenditure but still support the delivery of the Council's core objectives and priorities. Examples of this type of loan include working capital loans to the Council's Local Authority Trading Companies (LATC's) and loans to Wiltshire Schools to enable Academy conversion.

#### **Growing Place Infrastructure Fund Loans**

- 10. The Growing Places Infrastructure Fund (GPIF) was established by government as a programme in 2012, providing Local Enterprise Partnerships (LEPs) with funding to establish revolving investment funds.
- 11. In our area, GPIF loans have been issued by the Swindon and Wiltshire Local Economic Partnership (SWLEP). In June 2024, Wiltshire Council took on the

functions and staff of the SWLEP, now the Swindon and Wiltshire Business Growth Unit (SWBGU), within the Economy and Regeneration department. This includes the operation of the GPIF revolving loan programme including the novation of loan agreements issued by SWLEP to Wiltshire Council. New loans may be issued by the council following the transfer of functions.

- 12. Wiltshire Council, as the accountable body for the SWBGU, holds the GPIF capital fund and interest payments in a ringfenced account on behalf of Swindon Borough Council and Wiltshire Council for investment which contributes to the sustainable economic growth of the area under the LEP transition governance arrangements.
- 13. The GPIF loans provide funding to companies for capital projects that would otherwise not be deliverable, providing investments to companies in Swindon and Wiltshire to use towards capital elements of projects or to fund pre-revenue to companies.
- 14. These loans are issued and are expected to be repaid in full and may be offered with no security and as such are risker than other loans the council would otherwise issue.
- 15. The governance for these loans is managed through a GPIF working group, which seeks to advise on the day-to-day operation of the GPIF fund to ensure it is well managed with a view to supporting on the on-going economic growth of the area whilst safeguarding the integrity of the loan capital and its revenue generation capability
- 16. The decisions and business of the GPIF Working Group are subject to the overview and scrutiny of the Joint Management Partnership and Joint Oversight Partnership which sits between Swindon Borough Council and Wiltshire Council to manage these shared functions, and which reviews the programme's operation.
- 17. The S151 Officer may veto or pause the issue of a loan agreement if the due diligence work flags serious concerns or they believe that the governance processes have not been fully implemented by the GPIF Working Group. The S151 Officer will also have oversight of new GPIF loans to be awarded and the interest rate to be set, amendments to repayment schedules which may arise from-time-to time, and enforcement of the terms of the GPIF loan agreement terms to reclaim funds.

#### **Loan Framework**

- 18. All loans, with the exception of loans to Wiltshire Schools to enable Academy conversion and the GPIF loans described in the above paragraphs, must be secured against an asset or guaranteed by a public sector organisation with tax raising powers.
- 19. The maximum loan to value will not exceed 80% of the security.
- 20. The maximum duration of the loan will be 25 years, but the loan period must not exceed the useful life of the asset.

- 21. An independent valuation of the asset upon which the loan is secured will be undertaken by the Council.
- 22. A robust business case must be developed that demonstrates that the loan repayments are affordable.
- 23. The on-going value of the asset(s) that the loan has been secured against will be valued on a 5 year basis. A charge to revenue may be required if the equity value falls below the debt outstanding or if it becomes clear that the borrowing organisation is unable to service the debt.
- 24. Guarantees will be called upon if the lending organisation falls into arrears in line with the clauses set out in the signed loan agreements.
- 25. Given the administrative costs incurred in both establishing and managing loans of this nature an administration/arrangement fee will be applied to each loan made. The arrangement fee will be no more than 1.0% of the value of the loan value.
- 26. All loan proposals (including any loan re-scheduling) must be agreed with the Corporate Director of Resources (S151 Officer) in conjunction with the Council's Treasury Management team.

#### Limits

- 27. No specific maximum limits are proposed but all loans must be approved as set out above.
- 28. Loans less than £0.250m will not be considered.

#### **Subsidy Control and Interest Rates**

- 29. Following the UK exit from the EU the State Aid Rules ceased to have effect. The UK then became subject to the subsidy control provisions of the World Trade Organisation (WTO), existing Free Trade Arrangements (FTA), and those of the Trade and Cooperation Agreement (TCA). This change came into effect on 1 January 2021. These three set of controls have different definitions and provisions. However, it is unlikely that Wiltshire Council will be in breach of WTO and FTA arrangements if it observes the TCA Subsidy Control Provisions. It is expected that the control regime will be monitored and enforced by a body established by HM Government similar to the Competition and Markets Authority. HM Government's Technical Note on Subsidy Control observes that there may be a consultation in early 2021 to determine a "bespoke approach" with secondary legislation to follow. Nonetheless the TCA subsidy controls are enforceable now through the UK Courts.
- 30. The principles and terminology contained in the TCA subsidy control reflect State Aid legislation. It is to be expected that the new regulator and the Courts when implementing TCA subsidy control will have in mind the previous State Aid procedures and that there will be analogous reasoning. In general, the parameters of the new scheme will not permit subsidies from state bodies that amount to "financial assistance" to be made which confers an economic advantage on one or more economic actors not available on market terms. This, the TCA specifically identifies, includes a direct or contingent transfer of funds such as direct grants,

loans or loan guarantees. Not for profit organisations often undertake commercial activities in order to support the delivery of non-commercial activities and so can be classified as "economic actors" falling into this control regime. An economic advantage given to an actor will not be a subsidy if the state is acting in a way that a rational private investor would, for example in providing loans or capital on terms that would be acceptable to a genuine private investor who is motivated by return and not policy objectives. This is because the beneficiary is not considered to be obtaining an advantage from the State but on the same terms that it could have obtained on the open market.

- 31. Until further certainty is given by proposed legislation and regulators the actual interest rate charged on third party loans will be set with reference to the minimum permitted within State Aid rules operational in the EU at the time of fund advance and the Council's cost of borrowing plus an appropriate credit risk margin, whichever is higher.
- 32. If there is any doubt as to whether Subsidy Control may be an issue, Legal advice must be sought.

#### **Governance Arrangements**

- 33. Loans Defined as Capital Expenditure require Cabinet approval in order to be added to the Capital Programme and will be supported by a full business case.
- 34. The Corporate Director of Resources (S151 Officer) has delegated authority for awarding loans to schools, in order to assist with their conversion process to become an academy. Specific delegation was awarded by Cabinet at their meeting of 17 May 2016, minute number 63.
- 35. Growing Places Infrastructure Fund loans are given within the governance framework set out in paragraph 13.
- 36. All other loans must be approved by Cabinet supported by a full business case. Specific details in relation to drawdown of approved loan facilities must be specified as part of each business case.
- 37. Due-diligence checks will be undertaken to test the underlying assumptions set out in each business case. These checks will include but are not limited to independent credit checks and future cashflow forecasts.

#### Financial Risk

- 38. Where the Council issues capital loans to third parties (including to its own commercial companies), the expectation is that the funds lent will be re-paid in full at a future date.
- 39. However, the Council is required to consider the potential impairment of all loans that it issues to third parties on an annual basis to comply with International Financial Reporting Standards (IFRS 9). Where it is considered that there is a risk that any loan will not be re-paid, the Council will need to consider the level of any impairment, in full or in part) as appropriate. Impairments represent a real financial cost to the Council and are charged to the Council's General Fund revenue budget.

# **Exemptions**

40. Exemptions to this policy may be considered but any exemption will need to be approved by Full Council.

#### Wiltshire Council

**Full Council** 

#### **25 February 2025**

# Budget 2025/26 and Medium-Term Financial Strategy 2025/26 to 2027/28 - Addendum

# **Addendum Background**

The Final Local Government Finance Settlement was announced on 3 February 2025. As part of this final settlement additional funding was confirmed over and above that included in the provisional settlement and assumed in the budget for 2025/26 and MTFS 2025/26 – 2027/28 for Children's Social Care that has not been included in the draft budget papers published. The final grants have been confirmed as £2.296m for the Children and Families Grant (which was a consolidation of grants previously received and rolled into one grant) and £1.036m for the Children's Social Care Prevention Grant which has been uplifted since the provisional settlement. Together these grants total £3.332m which is £0.257m more than the grant received in 2024/25 and assumed pressure built into the budget from new burdens associated with the new Children's Social Care Prevention Grant, which is estimated as £0.500m and included in the budget report that was approved by Cabinet at their meeting on 4 February 2025.

Following the publication of the draft Budget 2025/26 and Medium Term Financial Strategy 2025/26 – 2027/28 report the council was notified of the NJC Trade Unions 2025 pay claim, on 31 January 2025. The request is significantly higher than the amount included in the budget and although this amount may not get paid at this level as the process is agreed through national negotiations, it is prudent to take the opportunity of the additional funding for Children's Social Care to allocate the additional £0.257m grant to fund existing pressures in Families and Children's Services and repurpose the same value of general fund funding of services and allocate this and set it aside for any additional pay pressure that might result from the national negotiations. It is therefore recommended as part of the budget setting process that these funds are transferred to the Pay Award reserve to help mitigate the pay award risk should it present in the 2025/26 financial year.

These changes do not affect the Net Budget Requirement or the Council Tax Requirement. The Budget Report 2025/26 and Medium-Term Financial Strategy 2025/26 – 2027/28 and tables and appendices within the report have not been amended to reflect this late change in grant funding from government and subsequent changes to service budgets.

On 5 February the Public Health Grant allocations for 2025/26 were also announced. This grant funding is ring-fenced for Public Health activity and is shown in the service budget line so does not affect the Net Budget of the council. The grant has increased from £19.011m in 2024/25 to £20.365m in 2025/26, which is an increase of £1.354m. This increase will support the staffing cost pressures as a result of pay awards and National Insurance contribution changes and will provide some capacity to manage the inflationary

pressures that are likely to present in the Public Health commissioned services.

This addendum does not impact on any of the proposals included in the Budget 2025/26 report and will only impact the gross budgets and income within Families and Children's Services, Public Health and Corporate Services and does not impact the net budgets reported. This additional grant funding does not impact the calculations used to establish the Council Tax Requirement and therefore there is no change to the Council Tax resolution.

#### **Proposal**

There are no changes to the Proposals made in the Draft Budget report approved by Cabinet and recommended to Council.

## **Reason for Proposal**

To ensure that the additional grant funding that government announced as part of the Final Local Government Finance Settlement is reported fully and reported as part of the budget setting process to be considered by Council and to provide transparency on the proposal on the allocation of that funding and continues to provide a balanced revenue budget for the financial year 2025/26 and does not impact on the Council Tax setting.

Lucy Townsend – Chief Executive
Lizzie Watkin – Corporate Director Resources (S151 Officer)
Perry Holmes – Director of Legal & Governance (Monitoring Officer)

## **Overview and Scrutiny Engagement**

- 1. There has been no review from Overview & Scrutiny Management Committee due to the timing of the reporting and the requirement for the additional funding to be used to fund Children's Social Care activity.
- 2. This report is being reported to Full Council on 25 February 2025 and there will be opportunity for scrutiny debate at that meeting.

#### Safeguarding Implications

3. There are no additional Safeguarding implications as a result of this addendum.

## **Public Health Implications**

4. There are no additional public health implications as a result of this addendum.

## **Procurement Implications**

5. There are no additional Procurement implications as a result of this addendum.

## **Equalities Impact of the Proposal**

6. There are no additional Equalities impacts as a result of this addendum.

## **Environmental and Climate Change Considerations**

7. There are no additional Environmental and Climate Change considerations as a result of this addendum.

# Risks that may arise if the proposed decision and related work is not taken

8. There is a statutory requirement to set a balanced budget. This report sets out the impact of the additional funding allocated to the council as part of the Local Government Final Finance Settlement published on 3 February 2025.

# Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

9. There are no additional risks associated with this addendum to the Budget 2025/26 and Medium-Term Financial Strategy 2025/26 – 2027/28 report.

#### Financial Implications - S.151 Commentary

10. The additional funding was confirmed by government on 3 February 2025 as part of the Local Government Final Finance Settlement and has been set out as being allocated to fund Children's Social Care. The use of the funding and the implications are set out in this addendum report.

#### **Legal Implications**

11. There are no additional Legal implications as a result of this addendum.

## **Workforce Implications**

12. There are no workforce implications as a result of this addendum.

## **Options Considered**

13. There is a statutory requirement to set a balanced budget. The additional funding allocation as part of the Local Government Final Finance Settlement could have been managed within the 2025/26 financial year as part of budget monitoring however time allows for consideration and a proposal to be presented for Council consideration.

#### **Conclusions**

14. The report supports effective decision making and allows the council to set a balanced revenue budget for 2025/26 and set Council Tax levels. It also ensures that the council has an MTFS to support long-term financial sustainability and aligns the budget to the council's Business Plan.

# Lizzie Watkin (Corporate Director of Resources - S151 Officer)

Report Authors: Lizzie Watkin, Corporate Director of Resources (S151 Officer),

### **Appendices**

None

# **Background Papers**

None

#### **Full Council**

#### **25 February 2025**

## Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28

## **Executive Summary**

This report presents the proposed 2025/26 Budget and the Medium Term Financial Strategy (MTFS) 2025/26 to 2027/28 that will continue to resource delivery of the council's Business Plan and its priorities.

The approach taken in the last two years to set a balanced budget over more than one year of the MTFS period puts the council in a good financial position going forwards into 2025/26. There are no proposals or reliance on reserves to sustain service delivery for the next financial year and the budget proposals also support setting aside funding for Waste Transformation in the future to ensure delivery of the changes required to meet the environmental and regulatory requirements.

The Local Government Finance Policy Statement 2025 to 2026 that was published on 28 November 2024 set out the direction of focus for funding for local government, which would be targeting funding to those councils deemed 'most in need' based on council tax revenue raising abilities and deprivation indicators. It also confirmed that the finance settlement for 2025/26 would be one year only. Following this announcement the Secretary of State announced the Provisional Local Government Finance Settlement for 2025/26 on 18 December 2024, which provided some indicative funding values for 2025/26 only. As standard, the Final Local Government Finance Settlement is expected early to mid February, and although additional changes between the provisional and final funding announcement are likely to be minimal, they are likely to be too late for inclusion within this report. If changes to funding are made recommendations will come forward appropriately. With the MTFS covering a three year period, this one-year funding position brings much uncertainty especially with new grant funding allocations changing for 2025/26 and the basis of this being one where the council is unlikely to see additional funding from government. Further uncertainty remains on pressures due to changes to government and national initiatives brought about by the change in Government. This uncertainty impacts the latter part of the MTFS period, and funding assumptions remain prudent in this area although risk remains significant if funding through mechanisms such as Business Rates fundamentally changes. Due to the breadth of funding and uncertainty of changes to government and national initiatives there is no proposal to fully balance the budget across the MTFS period. The budget gaps are not as significant as has been seen in previous years and significant steps are already being taken to address the pressures and identify changes required in service delivery to ensure the council remains financially sound.

The proposed 2025/26 budget ensures that vital services to the residents, businesses and communities of Wiltshire will continue to be provided, as well as delivering on the commitments set out in the Business Plan and will support maximising the opportunities to continue to have funding set aside and not draw from reserves to support future financial risks.

It is key that, to be able to continue to deliver on the Business Plan the council has sound and sustainable finances. The report sets out for approval by Cabinet, the budget setting proposals that deliver a balanced budget without the need to use reserves funding, ensuring that the council is managing its finances in a sustainable way. It is also key that expenditure to sustain services continues so an additional £53m gross pressure has been added into the 2025/26 service budgets to support the delivery of quality services focussed on protecting preventative and early help services, delivering the best outcomes for the residents of Wiltshire.

The report sets out the required increase in Council Tax for 2025/26, the increase in fees and charges and the General Fund reserve balance as part of a reserve strategy to provide improved future financial resilience. The key financial risks being faced by the council in estimating the level of reserves to be held are also outlined.

In addition, the report sets out for approval the planned Capital investment being made in 2025/26 and beyond, ensuring the delivery of key infrastructure projects as well as maintaining the council's asset base for future service delivery.

Lastly the report sets out the position of the Dedicated Schools Grant (DSG), to be approved by Schools Forum on 23 January 2025.

## **Proposals**

That Council agree:

- a) That a net general fund budget of 2025/26 of £527.420m is approved;
- b) That the Council Tax requirement for the council be set at £368.818m for 2025/26 with a Band D charge of £1,886.99, an increase of £1.56 per week:
- c) That the Wiltshire Council element of the Council Tax be increased in 2025/26 by the following:
  - i. A 2.5% general increase;
  - ii. Plus a levy of 2% to be spent solely on Adult Social Care;
- d) That the Extended Leadership Team be required to meet the revenue budget targets for each service area as set out in Appendix 1 to this report, for the delivery of council services in 2025/26;
- e) That the Extended Leadership Team be required to deliver the revenue savings plans for each service area as set out in Appendix 1 to this report, over the MTFS period 2025/26 to 2027/28;
- f) That the changes in the fees and charges as set out in Appendix 4 are approved;
- g) That the Capital Programme 2025/26 to 2031/32 is approved;
- h) That the Capital Strategy set out in Appendix 2 is approved;

- That the Schools Capital Programme 2025/26 to 2030/31 in Appendix 3 is approved, including the proposal recommendations included and set out in that appendix;
- j) That the DSG budget as approved by Schools Forum is ratified;
- k) That the Medium Term Financial Strategy, the forecast balanced budget for 2025/26 financial year and the MTFS 2025/26 to 2027/28 is endorsed.

## **Reason for Proposals**

To enable the Cabinet to recommend to Council a balanced revenue budget for the financial year 2025/26 and to set the level of Council Tax.

To enable effective, transparent decision making and ensure sound financial management as part of the council's overall control environment.

The Cabinet also sets out the final assumptions being used in the budget for growth, inflation, demand for services, the estimated level of income from sales, fees and charges and the level of income estimated from core funding e.g. Council Tax, Business Rates and government grants as well as the level of reserves held and assessed by the council's Section 151 Officer, as required, to provide future financial resilience.

This provides the council with a MTFS to deliver on the Business Plan priorities and drives long term financial sustainability.

**Lucy Townsend - Chief Executive** 

Lizzie Watkin - Corporate Director of Resources (S151 Officer)

Perry Holmes - Director of Legal & Governance (Monitoring Officer)

#### **Full Council**

## **25 February 2025**

# Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28

## **Purpose of Report**

- 1. This report sets out the Cabinet's proposals for the Council's Budget 2025/26 and Medium Term Financial Strategy (MTFS) 2025/26 to 2027/28.
- 2. It also sets out the Council's Capital Programme 2025/26 to 2031/32, and the Dedicated Schools Grant (DSG) to be approved by Schools Forum on 23 January 2025. A separate report is being presented to Cabinet on the Housing Revenue Account (HRA) budget 2025/26.
- 3. The detailed assumptions underpinning the Cabinet's proposals are set out along with the Section 151 Officer's opinion on the robustness of the budget estimates for 2025/26 and the adequacy of the council's reserves, including the General Fund reserve, as required under Section 25 of the Local Government Act 2003.

#### Relevance to the Council's Business Plan

- 4. The council must set a balanced budget for the financial year 2025/26. Setting out the MTFS for future years supports effective decision making and the alignment of the council's resources to deliver the priorities and objectives as set out in the Business Plan.
- 5. The 2025/26 budget proposals therefore look to ensure resources are focused and equally, where required, that savings do not undermine the delivery of the Business Plan principles established in 2022:
  - **Empowered People** We want every child to have the best start and life and we will help develop the communities and facilities that enable all residents to enjoy good physical and mental health to live active lives. This includes ensuring that they are safe throughout their life.
  - Resilient Society We want people in Wiltshire to build positive relationships and live well together, to be able to get involved, influence and act on what matters in their local communities. We want our communities to be able to grow sustainably with access to arts, heritage and culture and have easy access to high quality and affordable housing in beautiful places.
  - Thriving Economy We want to continue to grow the skills of our local
    workforce, nurture the opportunities available to them and for our economy to
    thrive. We must mitigate the impacts of COVID-19 on our children's education
    so that they can prosper and as a county we can attract and retain high value
    businesses and investment. As we continue to move forward, we must ensure

everyone can take advantage of a sustainable economy with vibrant, well-connected settlements.

• Sustainable Environment The council has committed to becoming carbon neutral as an organisation by 2030 and we now must take the lead and support the whole county as it strives for the same. Together, we must take responsibility for the environment and ensure it is well used, cherished, protected, conserved and enhanced.

# Background

- 6. When the 2024/25 budget was set an approach was taken to manage the financial position of the council over the medium term and a balanced budget was set not only for the 2024/25 financial year but also for 2025/26. This provided a strong position for the council during the year and leading in to setting the budget for the 2025/26 financial year. This balanced position included savings identified to be delivered in 2025/26 of £14.151m.
- 7. At the beginning of the 2024/25 financial year pressures were being seen mainly in demand led services such as Adults and Children's social care and SEN Transport and the forecast at quarter one was that the council was facing an overall overspend in the region of £8m by the end of the year. These pressures were assessed as significant and due to the strong financial management approaches taken cost control measures were implemented to ensure the council managed its financial position effectively for the remainder of the year.
- 8. The council continues to face these pressures and is forecasting a much reduced overspend of approximately £1.749m at quarter three. Significant work continues to manage this position, and officers are confident that the position will be managed to a balanced position by year end. The cost control measures that were implemented at quarter one remain in place. If the current forecast position is crystalised at the end of the financial year, the overspend will be met by a transfer from reserves, and if earmarked reserves are not available to re-purpose for this impact will be met by the General Fund Reserve. This would reduce the capacity of reserves to support the financial uncertainties and risks faced by all councils for the MTFS period and beyond and to support the delivery of the council's Business Plan.
- 9. Much of the pressure being faced in 2024/25 is assessed as impacting the base budget and would therefore likely to impact the budget position for 2025/26. Despite the pressures faced and the cost control measures implemented the council has managed the continued delivery of high quality services to the residents of Wiltshire.
- 10. With this pressure, the initial approach taken was one of containing costs and the council's Extended Leadership Team were asked to challenge the budget assumptions and reflect management action that would be undertaken to manage costs and inflationary pressures as well as on-going and new demand management approaches. Some of the identification at that stage resulted in some savings proposals which are included in the savings annex to this report.
- 11. Following the cost containment reviews and amendments management were then asked to bring forward further saving proposals that consume remaining pressures,

- focused on protecting preventative and early help services, directed at 2025/26 but considering the longer term where possible.
- 12. During October 2024 three face to face interactive public budget engagement events were held in Salisbury, Chippenham and Trowbridge libraries. We invited residents to give their views on how the council should prioritise spending in 2025/26. An online survey was also available for those who were not able to attend in person. More than 140 people attended the face-to-face drop-in events. They were asked to place tokens in 10 boxes that represented Wiltshire Council services, to indicate which services they would prioritise and allocate money to. The services were:
  - Adults supporting the vulnerable
  - Bus service subsidies
  - Council services promoting online access
  - Maintenance of highways and footpaths
  - Maintaining council buildings
  - Leisure and libraries
  - Waste and recycling services
  - Local economy promoting growth in business and employment
  - Supporting and safeguarding children
  - Investment in housing, roads and school buildings.
- 13. Top came leisure centres and libraries (15%) and supporting and safeguarding children (15%), closely followed by investment in housing, roads and school buildings (13%) and supporting vulnerable adults (12%).
- 14. The online survey which closed on 8 November 2024 also asked people to allocate tokens to the same service areas they thought most important. 1,699 people completed the survey and the top four service areas that respondents said Wiltshire Council should prioritise spending on were maintenance of highway and footpaths (17%), supporting and safeguarding children (13%), adults supporting the vulnerable (12%) and investment in housing, roads and school buildings (11%).
- 15. Due to the requirement to provide services (statutory services) the council has limited ability to move resources around flexibly to deliver services as prioritised by the public. Additional funding and investment decisions will consider the results of the consultation to ensure the public's view is taken into account.
- 16. Cabinet has continued to review all aspects by undertaking an assurance process.

#### **Main Considerations for the Council**

- 17. The Cabinet is proposing a balanced budget for 2025/26, which ensures funding for vital services to continue. Work continues on the identification of options to manage the budget gap in the second two years of the MTFS where there is less certainty on government funding. Critically, the Cabinet continues to effectively manage the Council on a footing of financial sustainability i.e., so it has enough funds to deliver services without needing to draw on reserves.
- 18. The budget for 2025/26 sees a net £37m increase in service expenditure, ensuring resources are provided to deliver the priorities set out in the Business Plan. To assess

- this, the Cabinet has duly considered the current position of Wiltshire's residents and businesses. The running and continuing provision of vital services to protect the vulnerable is considered paramount as is, wherever possible, future investment.
- 19. The council receives nearly 82% of its corporate funding from local taxes, Business Rates and Council Tax, and is dependent on increases in these to deliver services to Wiltshire's residents, communities, and businesses.
- 20. The Provisional Local Government Financial Settlement was announced on 18 December 2024 following the Autumn Budget Statement and Local Government Policy Statement 2025/26. The Provisional Settlement set out the expected individual allocations of grant funding for each council alongside setting out the Core Spending Power.
- 21. Core Spending Power is a measure of the resources available to local authorities to fund service delivery. It is derived from funding components of core government grants, including compensation for the freezing of the business rates multiplier, and includes an assessment of councils' Council Tax Requirement. Nationally the average Core Spending Power for 2025/26 has increased by 6%. Within this increase it is assumed that councils will utilise the total Council Tax increases available through the regulations. This is the overall quantum of the government funded Core Spending Power increase. The increase for the council is 4.3%, which is significantly less than the average.
- 22. The detail of this settlement can be seen in Appendix 1. There were several grants that although previously assumed to continue were confirmed in both the policy statement and provisional settlement as no longer continuing. The grants ceasing were confirmed as Rural Services Delivery Grant, Service Grant and Minimum Funding Guarantee. In 2024/25 the council received £4.503m, £0.404m and £1.289m respectively for these grants (total of £6.196m). New grant funding streams were announced and included a new Recovery Grant, worth £600m nationally and new Children's Social Care Prevention Grant. The council was not allocated any Recovery Grant and was allocated £2.296m of Children's Social Care Prevention Grant. It was confirmed that 'the Family Help grant (previous known as Supporting Families grant) was now included in the new Children's Social Care grant, alongside five other existing grants being rolled in to fund this new grant, which in 2024/25 totalled £2.390m. Additional funding for Social Care was announced with a total of £4.861m confirmed for the council, and this grant in line with that previously announced and anticipated.
- 23. The settlement also confirmed the increase in the basic Council Tax referendum level of 3% and gave upper tier authorities the ability to raise a specific Council Tax levy for Adult Social Care of 2%.
- 24. We still await funding reforms that will ensure Local Government receives the funding, particularly for Social Care, that it needs to deliver vital services. Even with the provisional settlement from Government, the level of specific grant funding Wiltshire received from Government to fund core local services stands at just £96m (18%).
- 25. The Governments Autumn Budget set out increases to employer's National Insurance contributions and also confirmed that local authorities would be compensated for this pressure for directly employed staff only and have allocated £515m nationally to cover this cost. This value will not fully compensate councils, with an estimated £0.750m

- pressure added to the council's budget to ensure provision is made for any cost not compensated and funded by Government.
- 26. For 2025/26 the Cabinet is proposing a 2.5% general increase in Council Tax with a proposal of a 2% levy, permitted by government, specifically for Adult Social Care. The levy will raise £7m and will help to fund, in part the £20m of inflation and demand growth that has been built into the Adult Social Care budget and overall the increases will provide sufficient funding to enable the delivery of vital services.
- 27. The Final Local Government Finance Settlement is due to be announced in early to mid February. Any additional funding announced will be allocated to services in line with the expectations set out in the minister's announcement, and there will be a consequential increase in the Net Budget of the council to the value of the overall increased grant funding, and this will be confirmed at the Cabinet meeting if announced by that meeting, with a subsequent amendment in the proposals made to Full Council.

#### Cabinet Investment into Business Plan Priorities

- 28. The core focus for the Cabinet is to protect and invest in preventative and early help services, thereby ensuring not only key services to Wiltshire's residents and communities are maintained, but that the Council is on a sound financial footing.
- 29. In addition to this, specific one-off investment has been continued to be made on focused activity from the Business Plan Priority reserve.
- 30. In July 2023 £10m capital investment was made on resurfacing and increasing the spend on preventative infrastructure in Wiltshire. In the 2024/25 budget setting process base budget investment was made into highway prevention, with £1m revenue being invested to increase resilience on the County highway network.
- 31. The Cabinet's business plan priority reserve was created in February 2023 to allocate one-off spend on focused areas, and overall current forecast is spend of £1m for gully emptying, £0.578m for parish stewards, £0.434m for road signage and increased safety, £0.499m for fly tipping and litter enforcement and £0.105m for other enforcement activity across council services. The investment in enforcement of waste offences such as fly tipping, fly posting and littering has led to reductions in the cost of clearing the waste, additional income and a noticeable improvement in the cleanliness of Wiltshire. Funding for the employees delivering enforcement work in 2025/26 continues through the Council Wide Enforcement Activity fund detailed below.
- 32. The remaining Business Plan Priority reserve will be utilised on enforcement, with a particular focus on planning enforcement. £0.250m has been allocated for 2024/25 and 2025/26 to increase the capacity of the planning enforcement team and address complex and contentious cases and ensuring the Council increases its presence and activity in this area. £0.300m of other elements of enforcement activity have been identified and delivered in 2024/25 and a further £0.521m over the course of 2025/26 to ensure the safety of our communities remains priority.
- 33. The Cabinet will continue to allocate funds to invest in preventative measures, especially where this demonstrates and delivers improved outcomes for residents and

- cost reductions for the council. A key aspect of this investment in prevention activities are the savings in this budget being directly derived from reduced costs. The following paragraphs set out some examples of this investment and the outcomes of this.
- 34. The £10m Housing Acquisition fund that was set aside by the Cabinet in July 2023 will leverage up to £40m of investment and delivers homes for a range of services that support savings delivery and cost avoidance in areas such as placement costs in Adults and Children's Social Care. An example of the use of this is the investment of £10.560m providing housing for 68 care experienced and asylum seeking young people and £1.6m providing four solo children's homes in Wiltshire which support the delivery of total savings of £0.935m in children's services across the period of this MTFS.
- 35. We are on target to complete installation of retrofit measures to 86 homes by the end of March 2025, funded via the Home Upgrade Grant (HUGS2) that will provide energy efficiency measures for low income off grid homes and help with mitigation of fuel poverty. Efficiencies continue to be seen in street lighting which has delivered £1.088m of savings to date with a further £0.250m in the 2025/26 budget. The Property Carbon Reduction Programme also continues to deliver energy savings and a reduction in carbon emissions across the council's assets, the overall £10.4m programme which commenced in 2021/22 is scheduled to be completed in 2026 at the end of which it will have delivered £0.707m in revenue savings in the operational estate and an additional £0.3m to be saved in the 2025/26 budget.
- 36. In 2024 Waste Services purchased a shredder that has enabled diversion of waste from landfill and a reduction in disposal costs via energy from waste contracts of £0.140m a year.
- 37. Wiltshire has a strong preventative approach with a wide range of evidence led early help programmes within the Families and Children's Service.
  - a) Wiltshire's Pause team was launched in 2017 works to improve the lives of women who have had, or are at risk of having, more than one child removed from their care, and thus reduce pressure on the services and systems that affect them. Based on Pause national data, the small team prevents on average 19 children entering care each year.
  - b) Stronger Families edge of care service provides families with intensive support and intervention, for aged 10 –17 year olds, working to prevent family breakdown. The service prevented 94% of all young people identified as being on the edge of care, from entering the care system as reported in September 2024.
  - c) Families and Children Transformation (FACT)
    - i. Transitional Safeguarding is an emerging discipline that seeks to provide an approach to safeguarding practice for adolescents crossing into early adulthood (defined as aged between 10 and mid-20's).
    - ii. multi-agency Family Help arrangements to enable children, young people and families to access the right help at the right time through a co-ordinated approach to prevention and early intervention
  - d) Dads Matter too was originally a 12-month project introduced focusing on supporting "hard to engage" fathers of children under the age of 1, including

- unborn children. This programme had an 80% engagement success rate which has led to this programme becoming "business as usual" providing intervention, consultation and training for fathers.
- e) Canons House, rated good by Ofsted in November 2023 provides overnight short break care for up to 34 children and young people with profound and multiple difficulties and complex health and care needs, ensuring that these children and young people can remain at home with their families and preventing family breakdown that may otherwise have resulted in entry to the care system.
- 38. The council invested £3.8m from the additional pressures money allocated by government to children's services in 2024/25 to fund early help activity to support the delivery of the SEND Sustainability Plan. The funding is focused on new activity such as support and mentoring for pupils with social emotional and mental health needs in secondary schools, training for schools in supporting pupils with Autistic Spectrum Condition, Dyslexia and other needs across mainstream provision, and increased capacity within the statutory SEND service. This activity continues into 2025/26.
- 39. The Prevention and Wellbeing Team sits at the front door of Adult Care and enables a different conversation with people that contact us for care and support. They seek to maximise people's use of personal and community assets and improve people's connectedness to their community and other networks to enable them to find their own solutions and flourish within their communities. The team supports people to remain independent of, or reduce dependence on, formal care and support services as well as therefore improving people's wellbeing.
- 40. Further detail on spending for services is provided in the report. The MTFS appendix contains further detail on inflation, growth and savings for individual services provided by the council.
- 41. A simple overview on where monies are spent is shown below. his is the net spend position that reflects the gross cost less the income services receive so where services receive greater income the overall cost will reduce.

# For every £100 of core funding we receive to fund services, we spend:



£38 on caring for vulnerable adults



£21 on supporting and safeguarding our children and young people



£10 on managing Wiltshire's waste and protecting the environment



£9 on funding the investment in Wiltshire schools, roads and housing



£8 on maintaining Wiltshire's highways and subsidising local bus services



£5 on running the council



£4 on the council's extensive property assets



£3 on our online and digital services



£1 on Wiltshire's leisure and libraries



£1 on improving Wiltshire's economy

- 42. There are £29m of savings proposals over the MTFS period detailed in this report and appendices. In 2025/26 there is a proposed £15.4m of savings, £14.2m of savings included in last year's budget setting process and previously approved, updated to £9m to reflect known deliverability and timing changes, and £6.4m of new savings proposals as part of the cost containment activity and to close the remaining budget gap for 2025/26.
- 43. The paragraphs below provide an analysis by services of the budget being proposed. The tables analyse the movement from the 2024/25 base budget to the proposed base budget in 2025/26.

## People Services - £312m annual spend on services

Adults Services - £194m annual net spend on services

Table 1 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	179.614
Prior Year Pressure	10.455
Technical Adjustments	3.225
Pay Inflation	1.060
Contract Inflation	4.458
Demand	3.875
Savings	(8.237)
Base Budget 2025/26	194.450

- 44. The key objective within the Adult Social Care directorate is to ensure individuals with care and support needs are achieving outcomes and have choice and control in all aspects of their lives. Adult Social Care effectively promotes independence and maximises opportunities for individuals.
- 45. In setting the budget for this MTFS period, account has been taken of demographic pressures that will see more people requiring support, despite the effective preventative approach in place. This is on addition to the rising cost pressures that providers face due both to general inflation, and sector specific cost pressures. Consideration has also been made for the budget pressures seen in 2024/25 as we have seen increased costs to sustain the market and a number of extremely high-cost packages coming through for existing and new individuals. The customers that are being referred to the Whole Life Pathway services are increasing in complexity with a notable increase in the people who have autism.
- 46. Technical adjustments of £3.225m have been made to the budget in 2025/26. These net off across the council's budgets in total. £0.832m is being transferred from Families and Children's for the transition of young people with SEN social care needs into Adults Services. £2.393m is included to adjust for the income previously received into the service for Adults Social Care Discharge funding. The funding has been amalgamated with the iBCF in the provisional settlement. There is no impact to the overall quantum and funding services will receive.
- 47. We are continuing to work with providers to deliver a sustainable and affordable market with community focused provision that ensures value for money for both

- Wiltshire Council, providers and partners in line with the business plan themes of understanding our communities and working together.
- 48. Transforming Adult Social Care (TASC) continues to deliver the priorities within the business plan. The Self-Directed Support (SDS) project is focusing on improving people's choice and control in terms of achieving their outcomes. This will be delivered through improved access to Direct Payments, Individual Service Funds, Personal Health budgets and a community catalyst approach. TASC also has a focus on prevention, and this is evident in the Technology Enabled Care (TEC), Practice development and quality assurance, and prevention and community projects. Practice development guidance is in place which ensures all staff within the department are using a strength based, preventative approach which will benefit people who use adult social care whilst at the same time delivering savings. TASC workstreams are focused on identifying further opportunities to prevent and delay need.
- 49. Capital investment has enabled the purchase of a number of properties that are being used for supported living. This allows individuals with care and support needs to have a home of their own while receiving person centred support rather than living in more traditional care home settings.
- 50. There are a number of broader system pressures, for example, we need to support hospital discharge. A significant percentage of new demand is coming from discharge pathways often with increased complexity and the need for additional support. The Wiltshire Reablement service supports people to develop both new skills and return to previous levels of independence while delivering financial savings.
- 51. Ensuring that young adults are supported to move from children's to adult's services is vital to them being able to live the lives they chose. The transitions service works with people aged 18-25 to ensure that this happens. It will work closely to bridge the gap between children's and adult's services and will work in partnership with SEND, children's social care, adult's social care as well as voluntary and community sector services.
- 52. The Intensive Outreach Enablement service has evidenced that working in this way can reduce restrictive packages of care and promote independence and is an asset to the council and the prevention strategy. This service is part of a strong prevention and early support strategy working alongside the Prevention and Wellbeing team in order to enhance our community based offer for individuals with complex needs to remain living in their own homes.
- 53. The Shared Lives Wiltshire Scheme provides an opportunity for a different model of care and support. Its main aim is to support people to live as part of a family, within the carers home, where they receive the support, direction or care they need within a family environment. The service places adults who have an eligible need requiring support for a variety of reasons such as, mental health, learning disabilities, physical impairments, or are elderly or cannot manage to live without support. This has already made savings and further savings are built into this MTFS.

## Public Health – Grant funded, no net movement from last year

54. Public Health Services are funded by the Public Health Grant. The grant is spent on activities such as the Public Health Nursing service, Drug and Alcohol Substance Use

- services, Sexual Health services, Domestic Abuse services for Wiltshire and a wide range of health improvement services such as health improvement coaches.
- 55. In 2025/26 there are also the following grants to support the services provided by Public Health. The smokefree grant for £0.553m is allocated towards enhancing Wiltshire's smoking cessation offer. This funding supports the government's commitment to create a smokefree generation, alongside the Tobacco and Vapes Bill. The Domestic Abuse Safe Accommodation Grant of £1.078m, which will be spent in accordance with Central government stipulations, is an increase to the £0.865m received in 2024/25.
- 56. The Drug and Alcohol Drug and Alcohol Treatment and Recovery Improvement Grant (DATRIG) of £1.215m (which remains indicative until Treasury approval) and will be spent in accordance with the grants terms and conditions. This is a consolidation of the Supplemental Substance Misuse Treatment and Recovery (SSMTR) grant, the Rough Sleeping Drug and Alcohol Treatment Grant (RSDATG) and the Inpatient Detoxification (IPD) grant received in 2024/25.

Education and Skills - £38m annual net spend on services.

Table 2 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	38.682
Prior Year Pressure	0.354
Cabinet Investment	0.240
Pay Inflation	0.427
Contract Inflation	0.407
Demand	(1.250)
Savings	(0.779)
Base Budget 2025/26	38.080

- 57. This service area continues to face significant legislative change since the Education White Paper was published March 2022. The White Paper outlined how a strong school system will be delivered by schools, multi academy trusts, local authorities, faith bodies and the Department for Education working together. The ambition for all schools to be in a strong multi-academy trust (MAT), or with plans to join or form one, have been removed, with more of a focus on improving education outcomes for learners. The DfE support grant for academies to voluntarily convert to an academy ended on 1 January 2025. There are no plans for the DfE to continue to run the Trust establishment and growth fund. The government's new Regional Improvement for Standards and Excellence (RISE) teams will sit within a new framework of support and intervention. This provides new opportunities for local authority school improvement teams to be part of the targeted support offer within the RISE model. Selected statutory duties remain for all schools with additional duties for maintained schools. As a result, services continue to require constant review to reflect changes in demand.
- 58. New statutory guidance for schools and local authorities in relation to "Working together to improve school attendance" which reflect increased early intervention, changes in the law, a new national framework and the introduction of parenting contracts came into force on 16<sup>th</sup> August 2024 and this has put additional duties into the education welfare and targeted services.

- 59. The Children's Wellbeing and Schools Bill was debated in Parliament on 8 January 2025 and passed its second reading. Stronger powers for local authorities are anticipated to make sure children are getting the right education, along with requirements for a register of children not in school, to avoid children vanishing from education and to strengthen safeguarding.
- 60. As a result of these changes, monies have been set aside in a reserve (requested as part of the Quarter 3 budget monitoring report) which will assist initial implementation plans and MTFS demand includes additional education welfare officers.
- 61. The service runs a significant amount of school traded activity and as funding for schools grows tighter with the teachers' pay award and other cost of living increases the risk of income reductions rises. Previous years savings planned in school effectiveness of £0.123m due to the previous government's plans for all schools to be part of a MAT by 2030 are now unable to be delivered due to the change in approach to academisation taken by the DfE.
- 62. Demand has increased for commitments for pension costs of former school staff, this overspend in 2024/25 financial year and therefore £0.176m is included in the demand estimate as an on-going pressure is expected.
- 63. Despite the efforts of the SEN & Inclusion transformation programme to reduce demand, demand for statutory SEN services continues to show an upward trajectory with increased requests for Education Health and Care needs assessments to access support. In 2023, requests for assessments average at 100 requests received per month equating to a 29.1% increase over the last 5 years and above the national average of 23%. During the current financial year, we have started to see demand for assessments levelling off and becoming more predictable.
- 64. The table below shows the year-on-year increase in EHCPs issued; (Note peak in 2024 likely to be additional resource was put in place to reduce delays in assessments.)

	Number of EHCPS	Movement from prior year	% Movement from prior year
31 March 2022	4,371	253	6.10%
31 March 2023	4,762	391	8.20%
31 March 2024	5,605	843	17.70%
Forecast 31 March 2025	6,269	664	11.80%

- 65. It is for this reason that the continued investment in statutory SEN is required in the management, SEN and educational psychology areas with a total £0.416m included for 2025/26 financial year. The outcome of the inspection was extremely pleasing however there were some recommendations and this investment alongside an existing reserve will ensure improvements are resourced.
- 66. The Council has a Safety Valve agreement in place with the DfE. Under this agreement the DfE have committed to provide an additional £67m Dedicated Schools Grant (DSG) to assist the historic deficit whilst the Council must commit to bringing the high needs budget into an in year balance. The Council is delivering the required transformation through the High Needs Sustainability Plan. Whilst the activity against

the plan is broadly on track the financial limits are not yet on track and therefore progress against the agreement has been reported as off track. A revised plan has been submitted to the DfE, ratified by Cabinet in January 2025, forecasting that an in year balance can be achieved by April 2031. It is expected that the Council will be required to contribute up to £123.4m at the end of the 7 year period and therefore a reserve to begin to support the Council's contribution has been set up.

- 67. As a large rural authority school transport for children with SEN & disability is a risk on two fronts: firstly, the number of pupils eligible to take up the school transport offer is rising in line with the number of EHCPs and secondly the marketplace is insufficient to meet needs. This means that taxis for example, are a limited resource and unit prices for journeys are rising above inflation and in other cases they have simply not been available. In response to this a fleet of vehicles has been leased to transport pupils to the Silverwood school sites. Demand for expanded specialist places and price inflation across the MTFS are estimated at £8.881m. A number of transformational schemes and route reviews are in place to achieve the savings of £0.570m across the MTFS.
- 68. Other inflation is in relation to externally commissioned contracts and includes increases in traded income prices (negative inflation) to reflect staff pay inflation.

Families and Children - £75m annual net spend on services

Table 3 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	70.675
Prior Year Pressure	2.146
Technical Adjustments	0.095
Pay Inflation	0.857
Contract Inflation	1.765
Demand	1.903
Savings	(2.399)
Base Budget 2025/26	75.042

- 69. Performance continues to be strong following the Ofsted inspection in September 2023 which recognised the impact that significant investment into prevention and new initiatives is having on positive outcomes for children and young people with a resulting overall Outstanding grading.
- 70. Whilst many other local authorities have seen pressure on statutory services, the council's preventative family support approach and quality practice has reduced and delayed this. Inevitably demand and cost pressures still exist; including an increase in the number of care experienced young people requiring our support for longer as well as numbers of asylum seeking young people increasing. The funding councils receive from central government does not cover the full cost of unaccompanied young people's care given the higher levels of inflation. There are also significant challenges for all care experienced young people post 18 with supported and independent living costs increasing.
- 71. As a result of national and local area demand increases, the care placement marketplace remains saturated, and we are unable to provide in house foster carers for all children requiring this type of care provision. This means that in some cases

more expensive placements need to be sourced, which are up to five times more expensive, taking us from hundreds of pounds per week to occasionally placements costing thousands. A consequence of the minimum wage, cost of living, energy and other price increases is that the average unit costs have significantly increased, and inflation is also estimated at higher rates than originally expected. In addition, higher numbers of children in our care have complex needs and these have to have been met with bespoke care arrangements to address risk and complexity. This means demand for higher cost placements increases although the overall numbers of children and young people in care remains static.

- 72. Demand for children and young people services and inflation mirroring staff pay assumptions for in house schemes and from a mixture of spot and framework agreement contracts are included across the period of the MTFS at £2.378m for prior year placement pressure; £1.109m for 2025/26 placement demand, these are both based on increased numbers of children in higher cost placements due to the challenging market place and the complexities of the children and young people being placed. There is a £0.794m allocation from the children's social care prevention grant and £1.693m for inflation for Children's Social Care placements and support. The balance of inflation is inflation on the adoption west contract and partnership contributions.
- 73. Capital investment of £10.560m providing housing for 68 care experienced and asylum seeking young people and £1.6m providing four solo children's homes in Wiltshire was approved in the 2024/25 capital budget this will enable us to provide housing and commission providers at reduced rates. There is a national housing shortage specifically for one bedroom homes, and a capital bid has been agreed to purchase a number of properties for independent tenancies for care experienced young people to reduce costly demands on supported accommodation. Total savings of £0.935m are included across the period of this MTFS as a result. The placement savings presented are linked to the service developments planned, the purchase of the new children's homes and young people's support and accommodation and housing with plans to commission providers offering local placements at a lower unit cost.
- 74. Other placement related savings are centred around the continued partnership with finance and commissioning to deliver £0.350m of placement sufficiency savings and £0.360m relating to care experienced young people "staying close" linked to investment in care homes and other accommodation above.
- 75. Discussions with the Integrated Care Board (ICB) are on-going around appropriate levels of health funding to support the health needs of children and young people. A target of £0.500m has been included in 2025/26 to reflect the anticipated additional future income.
- 76. Other savings plans are focussed on staffing reviews including deletion of vacant posts of £0.319m and funding £0.160m family key worker roles against the new children's social care prevention grant, comprising 5 grants, including the former Supporting Families grant.
- 77. When young people with SEN & disability social care needs reach 18 years old they transfer to the new Transitions service within adult social care the budget associated with the young people turning 18 years is estimated at £0.832 in 2025/26m and this is

- transferred out of Children's Social Care and presented in Adults Services to meet the transfer of costs.
- 78. External legal fees budget of £0.390m is transferred to legal services to prevent use of expensive external solicitors and to invest in capacity in internal staffing to facilitate better value at case level.

# Resources - £47m annual spend on services

Assets- £20m annual net spend on services

Table 4 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	18.089
Prior Year Pressure	0.343
Pay Inflation	0.138
Contract Inflation	1.225
Demand	0.190
Savings	(0.310)
Base Budget 2025/26	19.675

- 79. The Assets service is responsible for managing the council's estate. The service is also responsible for the management of the Council's office, rural, investment and commercial estates.
- 80. Wiltshire Council takes a strategic and commercial approach to managing assets ensuring assets are well maintained, fit for purpose and that services can operate safely, efficiently, and effectively, thus ensuring the sustainability of the property estate. The council shares resources with other public services and uses technology, buildings, and other assets flexibly to maximise value and reduce costs. This all contributes to delivering the Business Plan by ensuring Wiltshire Council is an efficient and healthy organisation.
- 81. As seen nationally there have been significant increases in utility prices above CPI that are forecast for 2024/25 at 10% for electricity, 7.5% for maintenance and 10% for water. Increasing energy prices are a risk for the service. To ensure the council is operating as efficiently as possible savings are proposed through the property carbon reduction energy strategy for buildings and capital energy efficiency programme which delivers projects to reduce energy consumption and generate renewable electricity.
- 82. Demand in 2025/26 includes spend relating to compliance and inspections of all lifts and pressure systems and a one-off cost of a database to support compliance management. In addition, a review of health and safety requirements means the investment is required in relation to staffing, personal safety devices and system costs. Additional costs of £0.466m were estimated across the three year period in the depot strategy and these have been included in the MTFS.
- 83. Savings proposals focus on efficiency of asset operations and service efficiencies to reduce operating costs with £0.5m for energy efficiency projects across the period of the MTFS. Alongside this a review of the Councils' operational estate is underway to ensure resources are optimised in order to achieve best value which may mean

rationalisation, disposal or moving of services or transfer of selected assets leading to savings of £1m in the latter part of the MTFS.

<u>Transformation and Business Change - £0.277m net spend (£2.556m annual gross spend)</u>

- 84. The Council's Business Plan sets out the priorities, outcomes, and aspirations it seeks to deliver over ten years and outlines how its progress towards achieving these will be measured and represented. Achieving many of these outcomes will need significant change or transformation of existing business models and delivery methods. This will require innovation in how we approach service design and planning, which should be supported by evidence and insights from the broadest range of data available to us.
- 85. A decision was made in 2024/25 to fund this service wholly from flexible use of capital receipts and the Transformation Reserve. This approach has been reviewed during 2024/25.
- 86. Maintaining good financial sustainability to deliver a balanced budget means the demand for transformation should be considered a continuous and required capability. This needs specific financial provision to ensure the right scale of skills and capacity are in place to support the delivery and management of change programmes arising across the complex range of services performed by the council. The council has allocated one-off funding via its transformation reserve to enable this, which is anticipated to be replenished in part through savings delivered by transformation projects.
- 87. Although funding for specific transformation projects will continue to be utilised through the transformation reserve and Flexible Use of Capital Receipts where appropriate and desirable to do so, there is a change in strategic approach to fund the service in a more permanent manner and therefore £2.265m is included to fund in a phased way in the latter part of the MTFS.
- 88. In addition to this demand for the data and insights service outstrips capacity and £0.290m is included in demand to facilitate expansion of this service so that it can properly meet the business plan aim to "deliver data and business insights from a central hub" to support evidence based decisions across the council.
- 89. Many of the recent savings' proposals put forward by services in response to the financial pressures and budget setting process for the next three years were predicated on having access to suitable change and transformation capacity. Services will require timely delivery of significant programmes of work to suppress demand or redesign services and processes in areas such as waste and depot strategy and these are anticipating or requesting that provision of large parts of the change capacity and skills needed to support delivery of those programmes will come from the transformation team and associated enabling services. These must be delivered in addition to the existing in-progress strategic programmes including Transforming Adult Social Care Transformation (TASC), Families and Children Transformation (FACT), Customer Experience, Community Conversations and SEN and Inclusion transformation. It is important, therefore, to ensure that the flexibility to draw down against allocations of flexible funding sources such as the Transformation Reserve and Flexible Use of Capital Receipts remains in place for 2025/26, reducing in the latter part of the MTFS as funding is baselined.

## Place Services - £102m annual spend on services

90. Many Place Services receive significant levels of income from fees and charges, with this income shown in the service budgets. A focus on maximising these income streams has continued considering the market in which the services operate. Increases in the income budgets can be as a result of increased volumes of fees and charges as well as price increases and where these increases exceed the overall additional pressures in services the net budget will show as decreasing.

Highways & Transport - £43m annual net spend on services

Table 5 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	43.803
Prior Year Pressure	0.032
Technical Adjustments	0.909
Pay Inflation	0.348
Contract Inflation	0.976
Demand	(1.962)
Savings	(0.679)
Base Budget 2025/26	43.427

- 91. The main pressure facing the Highways and Transport service continues to be increasing costs on major contracts for Highways Maintenance and Design, Street Scene and Passenger Transport. These contracts support communities to move around easily and offer options for different modes of transport, delivering against the Empowering People, Resilient Society, Thriving Economy and Sustainable Environment priorities in the Business Plan. Increasing material prices, fuel prices and the increase in contractor Employer National Insurance continue to cause issues and risk for the service and the prolonged and extreme weather, including Storms Bert and Darragh, place unprecedented demand on available resources. The extreme weather has increased demand for resources both by requiring immediate response efforts and by accelerating the deterioration of the highway network, which in turn raises the need for repairs. Driver shortages continue to present challenges in SEND Transport and for some public transport services.
- 92. Wiltshire Council will delegate certain services to Westbury Town Council who will deliver all the litter, grounds, allotment and cemetery services within their boundary. This will be achieved in phases, commencing 1 January 2025, with the major delegation being on the 1st March 2025. This will result in reductions in the Street Scene contract costs of £0.210m in 2025/26 and future years.
- 93. The Fleet strategy has led to vehicle modernisation and travel savings of £0.114m in the 2025/26 budget along with £0.080m for various maintenance and operational reviews to seek efficiencies. Energy efficiencies continue to be seen in street lighting and a reduction in the energy budget of £0.250m has been built into the 2025/26 budget to reflect this
- 94. Additional funding of £1m for Highways preventative flood maintenance including surface repairs and drainage works was added to the revenue budget in 2024/25 and

this now forms part of the base budget allowing this enhanced service level to continue.

- 95. The Council was awarded Bus Service Improvement Plan plus (BSIP plus) grant of £2.1m per year for both 2023/24 and 2024/25, further increased BSIP funding of £5.891m has been confirmed for 2025/26 and includes capital as well as revenue funds. This funding is to improve, enhance and support bus services, improve infrastructure supporting services and assist contractors facing commercial failure to ensure services are maintained. It is also helping to manage inflation and retender pressures within the service.
- 96. A key condition of the BSIP grant is that the Council cannot reduce Public Transport services in this period, and delivery of savings proposals will therefore be delayed while this grant funding continues to be received. The savings impacted total £0.590m, relating to the review, repatterning and reduction of less well used bus services, out of area services and the removal of Saturdays from supported services timetable. A review of all supported public transport routes is underway after the successful introduction of the revised public transport policy in 2024, to ensure they remain fit for purpose in a post COVID environment. This may mean a change in provision from more traditional type bus services to an extension of Demand responsive Transport (DRT) for example, or the merging of some services.
- 97. £0.600m of savings will be delivered in future years through the Public Transport Network Review if additional grant funding is not available.
- 98. The Wiltshire Transport Model (WTM) has a base year of 2018, derived from traffic flow data collected between 2015 and 2018. The WTM will require updating or a new model developed, to ensure the council is best placed to meet Business Plan objectives in the longer term and to ensure robust business case submissions for future funding opportunities, including for development opportunities. The costs associated are identified as a budget pressure in 2026/27 and 2027/28.
- 99. The Highways & Transport budget is supported by income generated by services. The key areas for Highways & Transport are Car Parking and Street Works with growth of £0.475m included in the Street Works income budget for 2025/26 and an updated Parking Plan for 2026-2030. These income streams are reliant on demand from the Public and Utility companies so can be volatile as demand is affected by changes in the economy and in the community.

Economy & Regeneration £2m annual net spend on services

Table 6 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	2.526
Prior Year Pressure	(0.019)
Pay Inflation	0.045
Contract Inflation	-
Demand	0.043
Savings	(1.000)
Base Budget 2025/26	1.595

- 100. The Economy and Regeneration service has expanded to include the functions previously held by the Local Enterprise Partnership, now termed the Swindon and Wiltshire Business and Growth Unit. A new economic strategy for Swindon and Wiltshire will be considered by Cabinet in January 2025 as part of the conditions of this transfer. Government funding for 2025/26 for these LEP core functions has not been confirmed, but reserves held for transferred functions from the LEP provide funding for a further year only.
- 101. Funding for the Growth Hub has been confirmed in principle for 2025/26, which will see the service continue to act as the key point of contact for business support. The Growth Hub provides navigation, advice and guidance for businesses seeking support.
- 102. The £1m saving in this service area is the ending of the £1m investment in Wiltshire Towns that was agreed every year over a four year period. Some funding remains from that investment and has been set aside in a reserve and the Wiltshire Towns Programme will draw down the remaining earmarked reserve for 2025/26 to continue its work. The fund has supported 61 new businesses to open on the high street, supported events across Wiltshire and supported strategies for regeneration in Chippenham and Westbury. The Trowbridge Investment Framework is in development, and there is further work due to commence for additional towns.
- 103. The service will receive a further year of the UK Shared Prosperity Fund for 2025/26 at £1.8m. The capital allocation is substantially reduced and a revised Investment Plan for spend will come to Cabinet in February 2025. To date, the funding has been used to support start-up businesses and rural hubs, support businesses to grow, as well as to transition to Net Zero, reduce Fuel Poverty, support people with mental health and to transition to employment, and to invest in the training equipment and facilities necessary to train the next generation of green skills.
- 104. The service continues to support the delivery of broadband across Wiltshire, providing assistance to the Government's 'Project GIGABIT' and other broadband capital programme, to maximise broadband connectivity across Wiltshire.
- 105. The Government has set out that future funding across these programmes will be subject to Devolution and the Comprehensive Spending Review.

Planning - £3m annual net spend on services

Table 7 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	2.799
Prior Year Pressure	(0.101)
Pay Inflation	0.294
Contract Inflation	-
Demand	0.150
Savings	(0.212)
Base Budget 2025/26	2.930

106. A recruitment campaign has been underway since May 2024 to fill over 20 vacant posts and 18 new posts within the Planning service. Recruitment to some posts has been challenging and agency workers have been used throughout 2024/25 to fill some

- of the vacancies in essential areas of the service. At the end of 2024, 70% of new or vacant posts had been filled.
- 107. Good progress is being made to secure an up-to-date Local Plan. This is due to be considered at examination later in 2025. This will help deliver the needs of Wiltshire's growing communities from an economic, environmental and social perspective. This aligns with the four priorities in the Business Plan, Thriving Economy, Resilient Society, Sustainable Environment and Empowered People.
- 108. Planning application fees are set by Government and the most recent increase in fees were introduced in December 2023 following a consultation earlier that year. This included an annual indexation capped at 10% from 1 April 2025. The income budget was adjusted in the MTFS that was approved in 2024 to reflect this. This income is driven by demand and typically fluctuates according to the national housing market and economic situation.
- 109. In December 2024, as part of wider planning policy changes, the government announced its intention to take forward measures in the proposed Planning and Infrastructure Bill to allow local authorities to be able to set their own planning fees based on cost recovery. These proposals are expected to be taken forward following a government review in 2025. Changes are also expected in 2025 to increase planning fees for other categories of planning application (including householder development).
- 110. Building Control fees are set locally but must be set competitively to retain market share with the private sector. Fees are set in the upper quartile when benchmarked against other local authorities.

Environment £50m annual net spend on services

Table 8 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	49.582
Prior Year Pressure	(1.351)
Pay Inflation	0.175
Contract Inflation	1.923
Demand	(0.306)
Savings	(0.438)
Base Budget 2025/26	49.584

- 111. The significant pressure in Environment services primarily arises from the Waste Services contracts for collection and waste treatment. The contracts are focused on reducing the amount of household waste sent to landfill and increasing recycling to keep Wiltshire looking beautiful and taking responsibility for the environment whilst delivering against the Sustainable Environment priority in the Business Plan. Pressures from inflation were lower than expected in 2024/25 and the budget has been adjusted to reflect this and other contract savings. The majority of waste contracts are linked to CPI forecast at 2.2%.
- 112. Tonnage forecasts and waste treatment routes have been derived from a review of past years actuals and current trends and have not been increased for 2025/26. Waste tonnages are a risk for the service as a small change in tonnage can have significant financial implications. The council has a minimum requirement to send 110K tonnes of

- residual waste through two landfill diversion contacts (Lakeside Energy from Waste and Northacre MBT in Westbury), and failure to meet these requirements incurs compensation events.
- 113. Waste Services are forecast to generate £9.295m of income from Bulky Waste collection charges, sale of material collected for recycling in 2024/25 and Chargeable Garden Waste subscriptions. As recycling material income is particularly influenced by the changing global economic climate and near-term legislative changes it is notoriously volatile and difficult to predict. Budgets for 2025/26 have been based on the 2024/25 performance.
- 114. The Environment Act 2021 will require the Waste Service to deliver substantial service changes over the next three years, including the separate weekly collection of food waste from August 2027. Collections of flexible plastics will also be required to be included in the council's recycling collection services in the same year. In recent months government has released further details on the format of service delivery councils are required to move towards, but the financial implications of these changes need to be assessed, alongside the impact on existing and future waste contracts, which include the two long term landfill diversion contracts. The working assumption is that pressures arising from the Act will be covered by Government under New Burdens funding or via new funding streams as part of the proposed schemes, but the full detail of this is still awaited.
- 115. There are two main changes from this legislation that will impact costs of future waste service provision:
  - Extended Producer Responsibility for packaging (pEPR) where producers are now required to pay into a national scheme based on the type and quantity of packaging that they place onto the market. The Scheme Administrator is responsible for passing collected funds to local authorities involved in the collection and management of packaging waste. In December, Government announced Wiltshire's pEPR payment with a minimum value set at £7.6 million for the 2025/26 financial year. Year 1 scheme funding has been underwritten by Government, and it is expected that this money should be used to fund effective and efficient service delivery and increase recycling rates for packaging materials. Future funding will be determined by the scheme, based on an assessment of the effectiveness and efficiency of the council's waste services, and could be reduced by up to 20% in future years if efficiency and effectiveness improvements are deemed necessary.
  - The national Deposit Return Scheme (DRS) will require consumers to pay a deposit on all drink containers in scope of the new scheme (e.g. PET plastic bottles, steel and aluminium cans), which will be refunded through a national network of reverse vending machines at participating retailers and kiosks. After numerous delays, this is now expected to come into force from October 2027 and modelling suggests that Wiltshire would likely see a loss of income of circa £0.900m due to a reduction in recyclable material collected via the kerbside services negatively impacting revenue income.
- 116. Under new "Simpler Recycling" provisions, all councils will be required to collect the same materials for recycling at least fortnightly plus a separate weekly collection of food waste, and regular residual waste collections. Wiltshire Council does not currently provide a separate food waste collection, we have a mixed kerbside recycling

£5.861m income from chargeable garden waste service which offsets costs of collection only. These new requirements will have a significant financial and operational impact for Wiltshire's existing contracts and future procurement of new arrangements. To mitigate some of the anticipated additional costs, Wiltshire Council's Cabinet resolved in November 2024 to implement a new "three stream" recycling collection service which will keep glass separate from paper and cardboard and other mixed recyclables when collected at the kerbside, thereby increasing the amount of materials successfully recycled and potential income from material sales. However, increasing recycling and implementing food waste collections will reduce the amount of residual waste available for the long-term landfill diversion contracts, so these will also require close review. The council has secured agreement with DEFRA to commence separate weekly collection of food waste from August 2027 and under New Burdens has secured £4.990m capital funding for scheme set up, but details of the promised additional revenue funding is still awaited.

- 117. Other changes deriving from the Environment Act 2021 include supporting natures recovery including through Biodiversity net gain and the development of a Local Nature Recovery strategy. In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under the statutory framework, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met. This objective is for development to deliver at least a 10% increase in biodiversity value relative to the predevelopment biodiversity value of the onsite habitat.
- 118. This combined with other ecological legislative changes related to species and habitat have increased pressure on the Ecology team. A budget increase is required to part fund an additional resource and to fund a contribution towards the creation of a new Wiltshire and Swindon Nature Recovery Partnership in collaboration with Natural England, National Trust, Wiltshire Wildlife Trust and Swindon Borough Council.
- 119. The Public Protection service will increase income by £0.015m through the pest control service and licensing fees, both of which have exceeded income targets in 2024/25. The new ARCUS system will continue to develop, allowing annual fees and some applications to become autonomised, making efficiencies. During 2025/26 customers will have the ability to report complaints online, as well as accessing information on which complaints are actionable based on the legislation available.
- 120. A new Community Safety Partnership manager will be funded using Enforcement Management group funding in 2025/26 allowing for the development of the Community Safety Strategy and closer working arrangements to tackle Anti-Social Behaviour.

Leisure Culture & Communities £4m annual net spend on services

Table 9 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	5.379
Prior Year Pressure	0.019
Pay Inflation	0.644
Contract Inflation	(0.589)
Demand	(0.780)
Savings	(0.652)
Base Budget 2025/26	4.020

- 121. As part of the Business Plan priority to empower people and help people to stay physically and mentally active the council is committed to enabling communities to have access to quality leisure, sports and cultural opportunities, that include libraries and heritage.
- 122. Leisure Operations future income budgets are forecast to grow based on increased fees, updating of fitness equipment, business case developments and a new Trowbridge leisure facility. Savings proposals are included for this which will increase income budgets by £2.185m in 2025/26. Whilst all indications suggest this growth is very achievable it does bring with it additional risk from factors such as cost of living and competition.
- 123. £0.170m additional funding has been built into the libraries budget to deal with challenges in staffing cover and to enable book purchasing to ensure stock remains up to date and relevant to the needs of library service customers. The 2025-2030 Library strategy has been approved and will ensure that the service remains innovative, with efficient use of the allocated budget.

# Chief Executive Directorates - £47m annual spend on services

Corporate Directors and Members £4m annual net spend on services

Table 10 – Budget movement from 2024/25 to 2025/26

	£m
Base Budget 2024/25	3.292
Prior Year Pressure	0.515
Pay Inflation	0.079
Contract Inflation	-
Demand	0.181
Savings	(0.130)
Base Budget 2025/26	3.937

124. The Corporate Directors and Members budget has been reviewed following forecast overspends in 2024/25. The budget has not been uplifted sufficiently historically so to rectify this £0.515m has been built into the 2025/26 proposed budget to ensure a managed position is achieved moving forwards.

### **Capital Receipts Flexibilities**

- 125. The final finance settlement for 2024/25 confirmed that the capitalisation directive was extended until March 2030 and has again been confirmed in the provisional settlement for 2025/26. The flexibility allows local authorities the freedom to use capital receipts from the sale of their own assets to help fund the revenue costs of transformation projects and release savings and/or improve efficiency. <a href="Direction Flexible use of capital assets">Direction Flexible use of capital assets (publishing.service.gov.uk)</a>
- 126. It is important that any council using this flexibility is transparent in reporting its plans and the individual projects that are to be funded or part funded, report on planned savings and/or service transformation that is planned to be delivered and report the previous years' activity and realisation of benefits.

127. During 2024/25 £1m of transformational activity was approved to be funded by use of this regulation and this funding assumption is on going for 2025/26. The costs being funded again in 2025/26 are £1m relating to the Transformation and Business Change team costs, which support the delivery of the different transformation programmes and projects across the council, and specifically projects that support delivering a more financially sustainable council. The prioritisation of the programmes and projects supported by the Transformation and Business Change team is agreed by CLT and/or the relevant Transformation Board and is reported as part of the quarterly budget monitoring process to ensure the requirement of transparent reporting is met.

## Fees and Charges

- 128. As part of budget setting, where the council has discretion on the setting of fees and charges and increases to these, it is recommended that the fees and charges to the public are increased by appropriate inflation rates to help support the delivery of a balanced budget. Other fees and charges will be based on statutory national levels (where set by statute) or individual agreements.
- 129. Detail of the fees and charges where the council has discretion on the setting of the fees and charges, as well as those statutorily set can be seen in Appendix 4.

#### **Council Tax**

- 130. The level of Council Tax income for the council is driven by 2 main factors; the number of 'Band D' equivalent properties, known as the taxbase and the charge per 'Band D' equivalent property.
- 131. The council is required to set the Council Tax Base annually following regulations. For 2024/25 the taxbase was set at 194,423.87 Band D equivalent properties and for 2025/26 the Council Tax Base has been set at 195,453.54 Band D equivalent properties, which is an overall increase of 0.53%, less than originally forecast (1%).
- 132. As part of the Provisional Local Government Finance Settlement the basic Council Tax referendum threshold of 3% was announced along with the maximum specific levy for Adult Social Care of 2%. Further detail is given in Appendix 1.

#### Reserves - General Fund and Earmarked

- 133. Over the past few years a reserve strategy has been enacted to steadily increase the level of the Council's General Fund reserve to a level more in line with the financial risks the Council potentially faces. This has increased the financial resilience of the council in being able to deal with, and more importantly withstand, any financial risks or shocks that may materialise.
- 134. It is vital that the General Fund reserve meets, or is at around, the level of financially assessed risk. For 2024/25 this was set at £34m and for 2025/26 the level of risk remains at a similar level.
- 135. The general fund reserve risk assessment is shown in annex 8 of appendix 1. This uses the estimates of key financial risks facing the authority in 2025/26 and it provides an estimated risk assessed level of reserves based on the specific complexities and activities unique to Wiltshire Council. This assessment is reviewed and refreshed

- every year to reflect the known financial risks in that year and provides an update on the financial resilience for the council.
- 136. The risk assessed level is a tool the Council's Section 151 officer uses to manage and context financial risks facing the authority and is not an exact science. It is key however in determining the financial resilience of the authority in terms of the level of reserves that should be held against the level of assessed and estimated financial risk.
- 137. The achievement of a balanced budget without the need to use reserves for on-going activity puts the Council in a strong financial position with reserves now at a level to provide financial resilience with robust additional budgets included in the 2025/26 budget for known risks that are not fully quantifiable.
- 138. In addition to the level of the general fund reserve, there are other reserves held against the financial risks facing the council. These reserves have been created to deal with risks around demand, volatility and risk. A review is undertaken at least annually of these earmarked reserves and the continued need to have funding set aside for the original purposes at the level set aside.
- 139. The Latent Demand reserve was set up when ongoing demand increases that were supressed during the COVID-19 pandemic specifically mitigate any unquantified risks facing the authority on social care, particularly children's social care. The reserve has a small (£0.123m) balance that will be used in the 2025/26 financial year and all other on-going budget pressures from latent demand have been built into future years of the MTFS.
- 140. Given the size of the Collection Fund, at nearly £430m, any small variance can potentially have a significant impact on the Council's finances. The risk of loss of income on local taxation in any given year, along with the risk of deficits arising is a general financial risk and as such this risk is included in the amount required to be set aside in the General Fund Reserve.
- 141. In setting the budget every year an assessment is made on the surplus or deficit of the Collection Fund. There is confidence now that an estimated surplus, of £2.990m can be declared and the benefit of this will be seen in 2025/26. These surpluses and deficits change annually and will be funded by the General Fund Reserve if these costs cannot be contained within the revenue budget in any given year, and this is reflected in the amount set aside in the General Fund Reserve. In previous years the Collection Fund risk has been mitigated with a separate reserve.
- 142. Alongside the Provisional Settlement MHCLG has published a consultation on funding reform. The Autumn 2024 Budget announced the Government's intention to pursue a comprehensive set of reforms to place local government in a more sustainable position, and the Autumn Budget promised a deprivation-based approach in 2025/26, followed by broader reform through a multi-year settlement from 2026/27. The government also intends to reset the business rates retention system in 2026/27. The reset will apply nationally. This adds great uncertainty to funding in future years and the council could be exposed to significant changes in funding through any re-set. Prudence has been applied to the budgets in these areas. If this funding income presents higher than the estimates that have been included in the budget every opportunity will be taken to set this aside to help manage the High Needs deficit and contribution that will be required from council funding should the statutory override not be extended.

143. The council overall has significantly improved its financial standing over the last couple of financial years through its sound and prudent financial management and continues to do so. There is now a significant level of reserve cover against the assessed financial risk in 2025/26. The General Fund reserve now stands at 6.55% of the Council's net revenue budget.

#### MTFS 2025/26 to 2027/28

144. A summary of the overall MTFS proposed budgets for 2025/26 can be seen in the below table at Corporate Leadership responsibility level. More detail can be seen in the appendix 1, which show the changes to the service budgets from the revised 2025/26 budgets in greater detail.

Wiltshire Council - Proposed Budgets			
	2025/26	2026/27	2027/28
	Proposed	Proposed	Proposed
	Budget	Budget	Budget
	£m	£m	£m
Corporate Director People	311.965	324.160	336.041
Corporate Director Resources	46.849	49.500	51.710
Corporate Director Place	101.557	103.692	106.205
Chief Executive Directorates	14.210	14.597	14.982
Corporate	52.839	56.270	57.749
WILTSHIRE COUNCIL NET BUDGET	527.420	548.220	566.687

145. The MTFS sets out the forecast budget position for a 3-year period. The above table shows the proposed service budgets for 2025/26 to 2027/28, and the below table shows the movements in the Net Budget and Funding for the council and the overall financial position of the council. Overall, the budget is balanced in year one with gaps in years two and three of the MTFS period that are significantly lower than previous budget gaps, which is a continuation of the strong and sustainable financial basis the council sets out to deliver quality services to the public of Wiltshire.

deliver quality services	2025/26	2027/28	
	£m	£m	£m
Budget 2024/25	490.298	527.420	548.220
Prior Year Base Budget Changes	13.778	-	-
Funding Changes/ Technical Adjustments	(0.239)	0.948	-
Pay Award	5.309	4.752	4.687
Cabinet Investment	0.240	-	0.387
Contractual Inflation	13.303	10.570	9.273
Demand	20.096	12.675	9.947
Savings	(15.365)	(8.144)	(5.826)
Budget 2025/26	527.420	548.220	566.687
Funding 2024/25	(490.298)	(527.420)	(544.157)
Council Tax Requirement	(10.683)	(13.876)	(13.713)
Social Care Levy	(7.059)	(7.432)	(7.881)
Rates Retention	(3.496)	-	-
Collection Fund (surplus) / deficit	(4.493)	2.990	-
Specific Grants	(11.391)	1.581	-
Funding 2025/26	(527.420)	(544.157)	(565.750)
GAP	(0.000)	4.063	0.937

146. New legislation allowing councils to implement a new second homes premium from 1 April 2025 were enacted prior to the setting of the budget for 2024/25. The approval for charging premium must be made 12 months in advance of the financial year in which those charges will apply. Due to the timing of the legislation councils who have approved premia charges have yet to bill, due to the 12 month lead in, and therefore the impact of implementing premia charges on second homes is not known yet. When evidence is available and impacts more certain Cabinet will consider this and an evidence based proposal may be brought forward in the future. Additional income from this taxation has not been included in the budget figures presented above.

# **Capital Programme 2025/26 to 2031/32**

147. The Capital Programme is not tied to an annual setting process like the council's revenue budget, with projects and schemes being added on their own merits by the Cabinet during the year. As part of the more robust governance process for Capital Investment, all new Capital requests require a full business case to go through the Capital Investment Programme Board. This is to provide oversight across the programme and alignment with the Business Plan priorities. This governance also provides additional challenge to ensure all figures are validated and profiled realistically.

	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Approved Capital Programme	250.511	209.669	132.353	395.601	988.134
2025/26 Budget Setting New Capital Investment	2.884	1.868	1.682	4.288	10.722
Total	253.395	211.537	134.035	399.889	998.856

148. The Capital Programme is a key area of investment for the council and in 2025/26 will now stand at £253.395m for that year and £998.856m in total over the 7 year period including HRA. The HRA Capital Programme detail is covered by the separate HRA budget paper being presented to Cabinet. As part of the ongoing review of the capital programme.

#### Resources

- 149. £0.480m investment has been added to the programme to carry out essential interim maintenance to the Maltings Car Park, Salisbury under the terms of an underlease. Works include brickwork, drainage, parapet and handrails (replacement/refurbishment) and protective coating to exposed brickwork.
- 150. £0.250m investment has been added to the capital programme to establish a dedicated maintenance budget for non-operational assets, providing greater transparency of maintenance for these assets and preserving the operational budget for its intended purposes.
- 151. An inflationary uplift of £0.206m has been added to the programme annually to the Facilities Maintenance Capital scheme budget. This covers capital maintenance, repair and replacement of building systems and infrastructure in council buildings, ensuring they remain compliant and operational. The budget has stayed static for

- several years. This inflationary increase will help prevent an effective real term decline in capital maintenance.
- 152. Investment of £5.630m to provide dedicated maintenance/upgrade funding to four strategic buildings that have a long-term future and will address critical infrastructure and deferred cosmetic improvements.

### Place

- 153. £0.505m investment is required for a 5 year plant and equipment replacement plan to support Winter and Resilience, Local Highways and Fleet Services. The plan will provide snow ploughs, blowers and emergency equipment (welfare units/lighting). Where feasible carbon neutral solutions will be sought.
- 154. Additional investment of £0.800m in 2025/26 to be funded from borrowing is required to complete the Hindon Stagger depot. The Hindon Stagger project is the last of 7 projects that form the Depot & Office Strategy Phase 1 capital programme of works. The overall programme commenced in 2018/19 and has a total budget envelope of £11.310m to deliver all projects. Cost increases over time have resulted in an increase in the total programme forecast being circa £0.800m over budget. The Hindon Stagger project has faced numerous challenges including its location requiring a significant volume of additional survey work and associated mitigations to secure approval for construction and inflationary cost pressures.
- 155. A total of £0.113m has been added to the capital programme for two air quality equipment schemes £0.035m for the purchase of two new real time sensor-based air quality monitors for Marlborough and Devizes to support the councils statutory responsibilities and provide data to inform the development and planning process, secure s106 contributions and support decision making around health impacts. Secondly £0.078m for the purchase of a new air quality monitoring station street box including nitrogen dioxide and fine particulates analyser in Calne. These will be funded through contributions from revenue.

#### **Dedicated Schools Grant**

156. Dedicated Schools Grant (DSG) is a ring-fenced specific grant used in support of the Schools Budget as defined in the School and Early Years Finance (England) Regulations 2013. The DSG is made up of four blocks with minimal flexibility to move funding between blocks. The allocations for 2025/26 are as follows:

	2024/25 Allocation	2025/26 Allocation	Increase	%Increase
	£m	£m	£m	
Early Years	52.886	76.914	24.028	45.43%
Schools	364.468	391.209	26.742	7.34%
Central	2.644	2.881	0.238	8.99%
High Needs	74.271	80.886	6.615	8.91%
TOTAL	494.268	551.89	57.623	11.66%

157. The allocations are driven by the school and early years census data multiplied by specific funding levels and factors in each block.

- 158. The council and Schools Forum set the budget for all blocks. Schools and High Needs blocks are top sliced by the ESFA and funds re-directed to academies and colleges and maintained school funding is passported via the council.
- 159. **Schools Block** it is the responsibility of the council to propose and make recommendations to Schools Forum to decide any changes to the formula which is used to allocate schools block DSG to all primary and secondary schools. Wiltshire Schools formula aligns itself as closely as possible to the national funding formula (NFF) in preparation for the hard formula, when the DfE remove or at least limit, local formula flexibility. For 2025/26, schools forum has agreed in principle to transfer £0.916m from schools block to support high needs pupils which is 0.24% of schools block.
- 160. **Early Years Block** this block is subject to a significant increase in 2025/26 with the full year impact of the additional funding available to working parents of 9 month to 2 year old and 2 year old children. The council must passport a minimum of 96% (previously 95%) of the funding they receive for all four types of funding stream. This means up to 4% can be retained by the council to fund the early years central functions. It is the responsibility of the local authority to propose and decide the allocation of early years funding the schools forum and early years providers are consulted annually to give their view on the local authority proposal. The council is consulting on passporting the full DfE funding hourly rate for disadvantaged 2 year olds, and reduced rates for the remaining categories to fund required central expenditure. The Council sets the provider rates and other early years block budgets following consultation with the sector and Schools Forum.
- 161. **High Needs Block** this supports provision for children and young people with special educational needs and disabilities (SEND). The block provides resources for specialist place funding, top up funding and external provision as well as funding high need services including statutory delivered by the council. It is the responsibility of the council to propose and decide the allocation of high needs block funding the schools forum is consulted on any proposed changes. The current and forecast demand in this area exceeds the funding from the DfE and as such a transfer of the deficit to the DSG reserve will be required and this will increase the DSG deficit. The proposed high needs budget for 2025/26 is in line with the draft revised SEND Sustainability Plan submitted to the DfE in December 2024 and will result in an increase in the deficit of £29.813m after Safety Valve payments as at 31st March 2026.
- 162. **Central School Services block** this provides funding for the council to provide central, statutory functions on behalf of pupils in both maintained schools and academies. Selected services are for all schools, for example copyright licences, (£0.571m) others are a statutory duty only for maintained schools. The block is funded per pupil for on-going responsibilities but the allowance for historic responsibilities funding (£0.151m) is reduced by 20% year on year. This element funds education services to children looked after and child protection in schools and early years for 2025/26. As the funding reduces costs will need to be covered from the council's budget where appropriate to do so. The council proposes the spending allocations funded from the Central School Services Block, but the final decision is made by the Schools Forum.

- 163. In the event of an underspend or overspend on the annual grant, the balance transfers to a DSG reserve at the end of each financial year. The 2024/25 quarter 3 figures to be reported to Cabinet in February show an in year overspend of £15.535m, after a planned transfer of the deficit to the reserve of £28.254m, which leads to a forecast cumulative DSG deficit reserve balance of £66.826m. at the end of the current financial year. The Council has a Safety Valve agreement in place with the Department for Education (DfE) and a revised plan was submitted to the DfE in December 2024 proposing changes to the length of the plan and to the mitigations within the plan. At the end of the revised proposal it is expected that the council will need to contribute £123.4m to write off the cumulative deficit. This remains a significant financial risk to the Council.
- 164. Final decision making takes place at the Schools Forum meeting on 23 January 2025 however agreements in principle were made at the December meeting and the working group met to discuss the papers in January and so no major deviances are anticipated.

# **Overview and Scrutiny Engagement**

- 165. Regular reports are taken to Overview & Scrutiny relating to the council's financial position and the budget report will be subject to review by the council's Financial Planning Task Group on 24 January 2025.
- 166. In addition to reviews by elected members through the scrutiny process, the budget proposals will also be subject to review and scrutiny by a range of stakeholders, including Trade Unions and Business through meetings with them and Schools Forum consideration of the Dedicated Schools Grant changes.

## Safeguarding Implications

167. Safeguarding remains a key priority for the council and this report outlines investment in services, in particular Adult Social Care and Children's Services, that reflects the commitment to safeguarding.

## **Public Health Implications**

168. Funding for Public Health services has not been confirmed for 2025/26 and is less certain across the MTFS period, which given the inflationary pressures seen brings risk. With the on-going cost of living crisis, that impacts on the most vulnerable and who often need the support from the services the council provides, it may become more difficult to deliver efficiencies that are required. Currently plans are in place to manage the delivery of Public Health services within the resources available, from the grant and planned use of the ring-fenced Public Health earmarked reserve, although plans may need to be changed should the final grant allocation differ from current assumptions.

#### **Procurement Implications**

169. None have been identified as arising directly from this report.

#### **Equalities Impact of the Proposal**

170. The council maintains its strong commitment to equality, believing that all groups and individuals within the community and its workforce have equal opportunity to benefit from the services and employment it provides. Equalities Impact Assessments (EIAs)

- help the council to arrive at informed decisions and to make the best judgements about how to target resources.
- 171. The council's budget planning framework is supported by a risk-based approach to the development of EIAs for the budget proposals, identifying, where appropriate, possible disproportionate impact in relation to the protected characteristics as described within the Equality Act 2010. The EIAs, where completed, also identify potential mitigation where applicable.
- 172. As part of the implementation of savings, once they are approved the Executive Office will support services in undertaking full Equality Impact Assessments for those individual saving proposals to assess whether the proposals are positive or negative for a protected group will be undertaken before the proposal is implemented.
- 173. In consideration of the overall budget and balancing the gap, Cabinet in putting forward its proposals were keen to ensure that investment and growth were directed to prevention and early help services so that this will have an overall positive impact on communities and service users, particularly children, older people and disabled people. This is in line with its commitments in the Business Plan 2022 2032.
- 174. As part of the corporate planning cycle, during Service Plan reviews in Spring 2025, the Equalities Impact of all service proposals (including their design) will be challenged, with scrutiny welcomed.

## **Environmental and Climate Change Considerations**

175. The business plan and budget that funds it have been developed to support strong, resilient communities in Wiltshire. The budget includes the continued resourcing of the Carbon Reduction Team, formed during 2020/21, and funding within the capital programme for specific schemes aimed at reducing the council's carbon footprint.

#### Risks that may arise if the proposed decision and related work is not taken

176. There is a statutory requirement to set a balanced budget. This report sets out the services delivered by the council and the financial implications of the budget proposed. This report provides visibility on the base assumptions on which the budget is built and sets out how the budget gap is to be addressed to deliver a balanced budget.

# Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

- 177. Assumptions on risks the council is exposed to have been factored into the council's risk assessment when assessing the level of general fund reserves the council should be holding.
- 178. The level of uncertainty has always been a risk, in terms of demand on services and with the increased costs nationally with changes to National Insurance there is an increased variability of the risk. The council has therefore tried to mitigate this through the increased level of growth assumptions within the MTFS, has included a corporate budget for the impact on prices paid of National Insurance changes where services are not able to manage any pressure above that budgeted and continues to hold specific

- reserves to manage some risks, that outstrips budget assumptions, as well as holding increased level of General Fund Reserve.
- 179. Risks associated with the uncertainty on levels of funding from government, specifically in latter two years of the MTFS and changes to the distribution of funding and mechanisms for allocating funding such as core grants and Business Rates are mitigated by setting assumptions based on prudence and experience, ensuring that increases in funding are included where indicative increases have been announced, otherwise funding is assumed to remain constant.
- 180. Risks associated with the savings proposals and service delivery have been assessed and as savings are implemented these risks will continue to be reviewed and monitored through the service and corporate risk management processes.

# Financial Implications - S.151 Commentary including Section 25 Report

- 181. Under Section 25 of the Local Government Finance Act 2003 there is a statutory duty on the Section 151 Officer to report to Council at the time the budget is considered and the Council Tax set, an opinion on the robustness of the budget estimates and the adequacy of financial reserves.
- 182. There is also a legal requirement under the Local Government Act 1992, section 32 and 43 to set a balanced budget. Critically the 2025/26 budget is balanced, it has no reliance on the use of one off funding i.e. reserves for on-going activity and has a full scheduled savings plan proposed for 2025/26 to achieve this position.
- 183. Cabinet and the Extended Leadership Team have worked collaboratively and effectively to contain costs, protect preventative and early help services and put forward proposed savings plans to support this balanced position.
- 184. With the starting budget position of a fully balanced budget set last year over the first two years of the MTFS period (for 2024/25 and 2025/26) the council started the budget setting cycle for 2025/26 in a good position, with a strong foundation on which to continue financial sustainability. With saving proposals put forward that, together with the proposed increases in funding some of which will be subject to annual decisions on Council Tax, sees the Council continue to have a balanced budget for the coming year, and only small gaps for the second and third year of the MTFS period in comparison to previous years. Critically this is achieved without the need to draw on reserves to balance and fund on-going services; the Council continues to operate within its financial means and maintains a strong financial management position.
- 185. Although there are risks in the budget in relation to demand led budgets, in particular Social Care, the level of savings requiring to be delivered remains a key risk, with over £15.4m in the first financial year (2025/26) and £29.3m over the three years of the MTFS. The monitoring, tracking and delivery of the Councils planned savings continues to be reported regularly through to Cabinet during the budget monitoring cycle, as of quarter 3 the Council is forecast to achieve nearly 85% of the savings for 2024/25, 61% for 2025/26 and 100% for 2026/27. This demonstrates the continued tight financial management that is now operating within the performance management framework that operates within services. It is imperative that this continues or where known issues arise these are flagged so that management action can be taken. Where savings are assessed as not being deliverable they are written back to the

- budget, recognising the pressure that these present, and managing that pressure effectively.
- 186. The risk of changes in funding for the council from both government and local taxation remains, with no certainty on grant funding past the first year of the MTFS and with confirmation of funding reform intentions and an intention to reset the Business Rates scheme in 2026/27. With the changes seen within the Provisional Finance Settlement the trajectory of impact is concerning.
- 187. The most significant risk for the council is the increasing deficit on High Needs Block of the Dedicated Schools Grant, with the position by the end of the MTFS period forecast to be a £131m overall DSG deficit position after Safety Valve payments. There is no certainty of the current statutory override, which is in place for the financial year 2025/26 being extended and the financial commitments that are crystalised are significant.
- 188. The council is exposed to cost pressures arising from changing demographics and a growing, ageing population. These lead to increased demand for adult and children services, as well as other services across the Council. These pressures have been built into the budget and will continue to be reviewed to ensure the assumptions remain robust and financial impacts can be reported, and management action taken if necessary, however risk remains on the ability to manage this pressure.
- 189. The government announcement as part of the Autumn Budget to increase National Insurance costs for employers has been confirmed as being compensated by government for directly employed staff. Although a formula has been provided for the basis of the allocation of £515m funding nationally some data is missing, and therefore allocations have not yet been published but are expected by the Final Settlement. High level calculations have been carried out and it is likely that the council will not be fully compensated for the cost of this direct payroll cost pressure. What is certain is that there is no additional funding announced at this stage to support this NI pressure on commissioned services and this therefore exposes the council to additional inflationary pressures in its contracted services. To mitigate this risk an allowance has been provided for although this may not prove to be sufficient.
- 190. The construction of the budget for 2025/26 and examination and validation of the budget proposals has been subject to challenge by the Extended Leadership Team, Heads of Finance and where relevant Heads of Service. Further scrutiny of the MTFS and budget proposals will be undertaken by the Financial Planning Task Group, which will report to the Overview and Scrutiny Management Committee, who will also consider and scrutinise the proposals.
- 191. For this budget cycle Business Rates assumptions across retained rates and the S31 grant given to the council mainly to compensate for statutory reliefs and exemptions have been reviewed and updated based on the current scheme mechanisms. In addition the provisional settlement confirmed that Councils would continue to be fully compensated for the freeze in the Business Rates multiplier.
- 192. The assumptions on income from Council Tax have been reviewed and reflect the current dynamic with respect to those in receipt of local council tax support, and overall the Council Tax collection rates have held. The Council Tax taxbase, the growth in the number of properties, has been less than anticipated for a second year,

reflecting the increase numbers of working age households in receipt of Council Tax Reduction, and fewer new houses built, resulting in a reduction in the amount generated from Council Tax than that previously forecast. Forecasts for future years have been reviewed and reduced to reflect these economic factors.

- 193. The Consumer Price Index (CPI) has been used as the set standard to forecast increases for contractual inflation. It is intended to move the Council over to this standard for all future contractual negotiations, where possible, to aid financial planning and budget and contract management. The forecast from the BoE is for inflation to continue to remain roughly the levels they are during 2025 and future year assumptions are predicated on the forecasts for future years.
- 194. Following the 2024/25 pay award the assumption on pay inflation has been adjusted to reflect a likely increased pay award for the 2025/26 financial year. It should be noted that given the current national picture around pay disputes that there is a level of uncertainty and volatility in this area, and this has been reflected in the increase financial risk assessment.
- 195. The finance settlement only provides certainty for the next year, and therefore there remains considerable uncertainty around what awaits in the following years, which will be covered by a new comprehensive spending review, and the funding reforms to Local Government. These are long overdue and promised however the indications from the change in funding from the Provisional Finance Settlement gives an indication that the council is likely to see further losses of grant income in future years.
- 196. As part of the budget setting process, the levels of balances and reserves is reviewed and determined ensuring that the level is justifiable in the context of local circumstances. The Section 151 officer has reviewed the level in order to ensure a prudent level of balances that reflects a full risk assessment commensurate with the risks that the Council faces and the context within which the authority operates.
- 197. The risk assessment, as detailed in Annex 8 of Appendix 1, has put context around the level of reserves held compared to a calculated risk adjusted assessment.
- 198. The forecast levels of earmarked reserves are set out in the appendix and forecast balances for future years over the period of the MTFS are shown. As can be seen although the level of reserves held against risk remains relatively constant the overall level of earmarked reserves is reducing. Although pressures such as demand, and demography are built into the revenue budget there is a continue need to fund transformational activity to ensure the council remains financially sustainable and the transformational reserve that was established to assist in this activity remains important.
- 199. The risk assessment undertaken to ensure prudent levels of reserves are held to mitigate the risks that the council faces considers the risk on the Collection Fund and income as well as general financial risks the council faces.
- 200. As part of the reserves approach all opportunities must be taken to maximise setting aside funding to manage the High Needs DSG deficit, with a positive step taken in 2023/24 to set aside additional Business Rates funding and an element of the Collection Fund Volatility reserve totalling in excess of £11m into a specific reserve and adding £7m to this new reserve as part of the setting of the revenue budget in

- 2024/25. No further contributions are currently planned however it is critical that the council plans for the funding of the deficit that will arise over the period it takes to bring the in-year position of the DSG into balance. There is a significant value required by the end of the plan period and there is no confirmation of the statutory override being extended, which places a significant risk on the council.
- 201. On the basis of the above, the Section 151 Officer's advice is that the level of reserves, following the prudent management and containment of costs during 2024/25 and the achieving of the objective of the strategic approach to increase the general fund reserve to provide increased reserve coverage of key financial risks is sufficient. The financial standing of the Council is sound and continues to improve in the context of those key risks and that the proposed budget is robust and achievable.
- 202. The statement above is drafted on the presumption that Government will find a solution towards dealing with (and accounting for) the accumulated deficit prior to the end of 2025/26, when the current statutory override is due to end. That is a considerable financial risk, and if a resolution to this is not forthcoming (in the financial year 2025/26) then the financial viability of the Council would need to be reconsidered.

#### **Legal Implications**

- 203. The Monitoring Officer considers that the proposals, together with this report, fulfil the statutory requirements set out below with regard to setting the amount of Council Tax for the forthcoming year and to set a balanced budget:
  - i. Section 30(6) Local Government Finance Act 1992 ('the 1992 Act') requires that Council Tax must be set before 11 March, in the financial year preceding that for which it is set.
  - ii. Section 32 of the 1992 Act sets out the calculations to be made in determining the budget requirements, including contingencies and financial reserves.
  - iii. Section 33 of the 1992 Act requires the Council to set a balanced budget.
  - iv. Section 25(1) Local Government Act 2003 ('the 2003 Act') requires the Chief Finance Officer of the Council to report to it on (a) the robustness of the estimates made for the purposes of the calculations; and (b) the adequacy of the proposed financial reserves.
  - v. Section 25(2) the 2003 Act requires that when the Council is considering calculations under Section 32, it must have regard to a report of the Chief Finance Officer concerning the robustness of the estimates made for the purposes of the calculations and the adequacy of the proposed financial reserves.
  - vi. The Local Authorities (Functions & Responsibilities) (England) Regulations 2000 (as amended) set out the respective functions of Council and of the Cabinet. With regard to the setting of the budget and Council Tax for the forthcoming year, the Regulations provide that the Cabinet formulates the plan or strategy (in relation to the control of the Council's borrowing or capital expenditure) and the preparation of estimates of the amounts to be aggregated in making the calculations under

- Section 32 of the 1992 Act. However, the adoption of any such plan or strategy/calculations is the responsibility of full Council.
- vii. Sections 30 to 36 of the Local Government Finance Act 1992 require that the Council sets a budget and Council Tax by 11 March each year and in doing so make a number of statutory calculations incorporated by resolution. The Localism Act 2011 has amended some of the terms and definitions to accommodate the introduction of powers to call local referendums for excessive Council Tax increase. The Council is now required to make a calculation of the Council Tax Requirement (Section 31A), excluding Parish precepts. The Act (Section 36) further prescribes that a calculation of the basic amount of Council Tax be presented together with an analysis of the Council Tax across the area and by valuation band. These calculations are required to be presented in a prescribed format and be subject to formal resolution by the Council.
- viii. Section 12(2) of the Local Government Finance Act 2012 and The Council Tax (Administration and Enforcement) (Amendment) (No.2) (England) Regulations 2012 gave billing authorities the discretion to levy an empty homes premium of up to 50% on council tax payable in respect of dwellings that have been left empty and unfurnished for two years or more, resulting in a council tax rate for long-term empty properties of up to 150% of the normal liability.
- ix. The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018 provided billing authorities with discretion to charge an additional premium where a property has remained empty and unfurnished for a period in excess of two years. 17.4 The Council Tax (Prescribed Classes of Dwellings) (England) Regulations 2003 as amended by the Council Tax (Prescribed Classes of Dwellings) (England) (Amendment) Regulations 2012 provided an authority with discretion to change the discount in respect of empty and unfurnished properties. Any change to the premium/discount in place needs to be published, as a public notice, within 21 days of the Council adopting any new premium/discount.
- x. The Local Authorities (Standing Orders) (England) Regulations 2001 deal, amongst other things, with the process of approving the budget. Under the constitution the adoption of the budget and the setting of the Council Tax are matters reserved for the Council upon recommendation from Cabinet.
- xi. Council budget: In reaching their decisions, Members and officers must act reasonably, taking into account all relevant considerations and ignoring irrelevant ones. There is a need to ensure that when making budget decisions the result is not one which is irrational in the Wednesbury sense (i.e. one which no reasonable local authority could have made). The Council's overriding duty is to make a lawful budget and this is the touchstone against which other considerations must be tested.
- xii. The Council must have regard to its public sector equality duties when making decisions. This includes the requirement to undertake a Diversity Impact Assessment in relation to all significant changes to policies, procedures or practice, and to pay 'due regard' to the need to eliminate discrimination and promote equality with regards to race, disability and gender. An overarching Equalities Impact Assessment has been included as an addendum report.

- xiii. Appropriate consultation will take place before decisions proposed in this report are made, where required by law or otherwise.
- xiv. Legal Obligations: Local authorities provide services pursuant to statutory duties (a mandatory requirement to provide services), and statutory powers, (where the Council has a discretion whether or not to provide services). Where the Council has a legal duty then it still has discretion in determining the manner in which those services are provided, so long as the level of quality of service provision is sufficient to fulfil the statutory duty. The decision to implement budget reductions must not focus solely on financial considerations. Members and officers must address the core question of individual service users' needs. Case law has held that resources may be a relevant consideration in making a decision relating to the manner of service provision, so long as the individual's assessed needs are met.
- xv. Charges for services: In considering charges for services, Members and officers should also try to achieve a fair balance between the interests of the users of council services and Council Tax payers. Where charges are being increased, Members need to bear in mind the scale and extent of the charges, and may need in some cases to have regard to the costs of service provision, associated with the power to charge.
- xvi. Members' responsibility to make a personal decision: In Council, Members must make a personal decision on how to vote on the budget proposals. Members' overriding duty is to the whole community. Members have a special duty to their constituents, including those who did not vote for them. Whilst Members may be strongly influenced by the views of others, and of their party in particular, it is their responsibility alone to determine what view to take when deciding upon budget questions. He/she should not follow party loyalty and party policy to the exclusion of other considerations.
- xvii. Members need to balance the cost to Council Tax payers of any budget reductions, against the need for the benefits of services of the particular nature, range and quality, under consideration. If having taken into account all relevant (and disregarding all irrelevant) considerations, Members are satisfied that it is financially prudent and reasonable to make the proposed budget reductions and adopt the recommendations then they may properly and reasonably decide to do so.
- capping: The Localism Act 2011 has superseded the previous capping legislation and dictates that should a council propose an increase in Council Tax which would be deemed to be excessive in accordance with principles and levels designated by the minister, then a local referendum on the proposal would be required. This would necessitate the drafting of an alternative proposal that would meet ministerial requirements to be put to the electorate alongside the 'excessive' proposition. Since this proposed budget is below the 'excessive' threshold this does not apply.
- xix. The Local Authorities (Standing Orders) (England) (Amendment) Regulations 2014) require that a recorded vote shall be held on the substantive motion at any Budget Council Meeting.

This budget has been prepared and the requirements of Section 25 of the Local XX. Government Act 2003 ('the 2003 Act') met relying on a "statutory override" provided by the Government to the Dedicated Schools Grant ("DSG") deficit. The relevant legislation is The Local Authorities (Capital Finance and Accounting) (England) (Amendment) (No.2) Regulations 2022 (2022 No. 1328) which amends The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003. The explanatory memorandum says: "Regulation 30L of the 2003 Regulations provides that where a local authority has a deficit on its schools budget relating to its accounts for a financial year beginning on 1st April 2020, 1st April 2021 or 1st April 2022, it must not charge the amount of that deficit to a revenue account. The local authority must record any such deficit in a separate account established solely for the purpose of recording deficits relating to its schools' budget. This instrument extends the application of that provision to financial years beginning on 1st April 2023, 1st April 2024 and 1st April 2025." The legislative override has been interpreted as meaning that for the "financial year" starting on 1 April 2025 the Council can make any of the calculations for Council Tax needed under the Local Government Finance Act 1992 (which defines "financial year" as "a 12 month period beginning with 1 April") and the Section 151 Officer can make their section 25 of the 2003 Act assessment. relying on the statutory override.

#### **Workforce Implications**

- 204. Proposals around how the budget gap will be bridged will look at all avenues open to the council and this includes looking at the service the council provides from a statutory and discretionary level as well as the costs that fall within those services most notably third party spend and staffing. Changes to workforce will be minimised in so far as they can be with mitigations such as holding vacancies where possible and steps to mitigate the need for redundancies will be taken.
- 205. As in the previous year staffing savings have been identified across the MTFS period and steps to deliver these savings will include the deletion of some vacant posts, holding other vacancies temporarily to deliver the vacancy factor of 6.5%, and reviewing service structures to ensure they have the most effective and efficient staffing models.
- 206. Where savings do impact on the workforce the council has in place robust policies and procedures to support this.

#### **Options Considered**

207. There is a statutory requirement to set a balanced budget. Other options to close the gap have been considered, however those options have been considered as damaging to the overall delivery of the new business plan and have therefore been discounted.

#### Conclusions

208. The report supports effective decision making and allows the council to set a balanced revenue budget for 2025/26 and set Council Tax levels. It also ensures that the council has an MTFS to support long-term financial sustainability and aligns the budget to the council's Business Plan.

#### **Lizzie Watkin - Corporate Director of Resources (S151 Officer)**

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17 February 2025

#### **Appendices**

Appendix 1 - Council Budget 2025/26 & Medium Term Financial Strategy 2025/26 to 2027/28

Appendix 2 - Capital Strategy 2025/26 to 2031/32

Appendix 3 - Schools Capital Programme

Appendix 4 - Fees and Charges 2025/26

#### **Background Papers**

None



# Council Budget 2025/26 and

## Medium Term Financial Strategy 2025/26 to 2027/28

This document sets out the council's Budget 2025/26 and Medium Term Financial Strategy (MTFS) to 2027/28.

It maps out in financial terms the council's journey for the 2025/26 budget and the following two years, building on the sound balanced base budget set last year and setting the delivery of the council's Business Plan.

The budget is refreshed annually to take account of any local or national changes and provides for a three year financial plan. Any review or refresh of the council's new Business Plan in subsequent years will also be reflected, incorporating any resulting financial changes. It will also be updated for changes in national and local funding assumptions, local income projections, spending pressures and any changes in savings plans.

Finally, the document sets out in detail the proposed saving plans and the estimates and assumptions used in developing the Budget and the MTFS. Those assumptions will be reviewed on a continued basis and, if necessary, amended for future years as more data and evidence on service demands and funding becomes available.

As such, whilst the budget estimates for 2025/26 have been proposed and are set, budgets for the ensuing years 2026/27 – 2027/28 are indicative only and are likely to change before the final budgets for those years are approved as part of the annual cycle. Year two and three of the financial plan follow the local elections and therefore any decisions for savings to manage the budget gap set out in this planning cycle will require approval in future years budget setting cycles.

#### **FUNDING ASSUMPTIONS**

The Council receives its funding to deliver services in the main from local taxes, Council Tax and Business Rates. It also receives funding from Government in the form of grant. Where this grant is either ringfenced or service specific e.g. Public Health, it is budgeted for against the service it relates too. All other grants are considered core funding and are held 'below the line' in the council's 'funding' to fund the spending on services.

This section will go through the assumptions and data being used to estimate the level of funding being received for those three main funding sources.

#### **Council Tax**

The forecast for Council Tax income is driven by two main factors:

a) The number of Band D equivalent properties, known as the 'taxbase'.

The taxbase for 2025/26 is estimated 195,453.54 Band D equivalents. Going forward, the council has assumed a collection rate of 98.9% and annual 'growth' of 0.75% and 1% respectively in the following years. It is forecast that, by 2027/28, the taxbase will be 198,888.64 Band D equivalents.

b) The charge per Band D equivalent property.

The Council Tax charge 2025/26 is £1,886.99, a general rise of 2.5%, plus a further 2% levy for Adult Social Care. A total 4.5% increase on the 2024/25 charge.

Forecasts for later years of the MTFS for financial planning purposes only are based on a further general rise of 2.99% p.a. in 2026/27 and 2.49% in 2027/28, plus the Adult Social Care levy at 2% in 2026/27 and 2027/28.

The current Government Council Tax Referendum prescribed limit of 3% for 2025/26 was announced in the provisional settlement. For 2026/27 onwards there is no confirmation of the core Council Tax referendum principles.

Also, in the settlement an Adult Social Care levy of 2% for 2025/26 was permissible for those Councils who have social care responsibilities. This must be spent wholly on Adult Social Services. No confirmation was given for 2026/27 onwards.

The table below sets out the detail on the Council Tax assumptions over the MTFS, with 2025/26 the basis of the council tax setting and future years for financial planning purposes only.

	2024/25	2025/26	2026/27	2027/28
Taxbase (Band D Equivalents)	194,423.87	195,453.54	196,919.44	198,888.64
Increase in properties		1,029.67	1,465.90	1,969.19
% increase		0.53%	0.75%	1.00%
Band D Charge (£p)	1,805.73	1,886.99	1,981.15	2,070.10
Increase in £p		81.26	94.16	88.95
Price % increase		4.50%	4.99%	4.49%
Total Council Tax revenue (£m)	351.07	368.82	390.13	411.72
Increase £m		17.75	21.31	21.59
Revenue % increase		5.06%	5.78%	5.53%

The council runs a Council Tax Reduction Scheme, which supports low income households with the cost of council tax. Currently approximately 25,500 households are supported through reductions in their council tax. This scheme has grown in importance due to the pressures on household income as it provides a gateway to other methods of financial support.

The council tax reduction scheme for those of working age is a locally designed scheme and following a review and consultation process there are no planned changes to the way the scheme is delivered in 2025/26. The council is however obliged to confirm local arrangements are publicised and that the council will continue to disregard war widow, war widower pensions and war disablement pensions for the purposes of calculating both council tax reduction and housing benefit in 2025/26.

#### **Business Rates**

National Non Domestic Rates (NNDR) are charged on non-domestic properties such as shops, offices and factories. They are calculated using the rateable value (RV) of an eligible property and multiplying it by the appropriate multiplier. The RV is set by the Valuations Office Agency (VOA).

For the financial year 2023/24 the RV that were previously based on property market figures from 1 April 2015 were updated to reflect the property market as at 1 April 2021. The government implemented a package of support for businesses including a transitional relief scheme which will adjust rateable values for those businesses seeing the largest changes in their bills. These transitional arrangements will be in place for 3 years following the 3 year revaluation updates. New RV are expected to be applied from 1 April 2026 with a new transitional relief scheme expected to be in place. Government have confirmed that councils will be fully compensated for these reliefs.

The council bills all registered properties and under the current national 50:50 business rate retention scheme, the council retain 49%, the Fire Authority 1% and 50% of the business rates collected is paid over to the Government.

When the 50:50 business rate retention system was introduced in 2013/14, as part of wide changing reforms to Local Government Funding, the Government also introduced a tariff and top up redistribution system based on the overall funding baseline that was set to ensure no Council lost out or indeed profited from the new Local Government funding system.

The level of tariff following the revaluation is estimated at circa £21.5m and is taken off at source as part of the business rate mechanism, when you take this into the rate retention mechanism, the Council retains around 35% of the distributable business rates within Wiltshire.

The Government announced in the provisional settlement that it would compensate Local Government for the loss of business rates for the under-indexation of the Business Rates multiplier. It is estimated therefore that Wiltshire will receive around £12.7m in funding through a section 31 grant in 2025/26. In future years it is assumed that the multiplier rate will increase or government will continue to compensate councils for the loss of additional business rates due to any subsequent freezes.

#### **Collection Fund Surplus/Deficit**

Over the past few years the Collection Fund has seen significant changes due to the economic impact of COVID-19 and the steps taken by government to support businesses and households during that period and more recently the impact of the cost of living crisis and impacts of high levels of inflation on the economy and households. Due to the mechanism and regulations significant volatility has been seen in business rates, with s31 grant funding received to compensate councils where significant deficits arise.

The declared position of the Collection Fund administered by the council for 2024/25 for the council's share is a surplus for Council Tax of £3.702m and a deficit for Business Rates of £0.712m (net surplus of £2.990m). Due to the accounting regulation for the Collection Fund this surplus is paid to the council during the 2025/26 financial year. Significant risk remains due to the uncertainty with the Collection Fund, particularly associated with the on-going economic impact of the cost of living crisis and continued high interest rates, any reset of the Business Rates distribution scheme and the impact of any transitional relief schemes.

Significant risk remains with the income from local taxation, with lower than expected growth in new homes, the on-going support from government and the risk of future Collection Fund deficits and these risks are included in the General Fund risk assessment which is set aside to mitigate all financial shocks, whatever they may be.

#### **Provisional Local Government Settlement**

Last year, at the end of November 2024, the Ministry for Housing, Communities and Local Government (MHCLG), published a policy statement which included some broad indications for the 2025/26 settlement, and gave indications of amounts of funding at a national level, but left some funding areas unknown.

On the 18 December 2024 the Minister of State for Communities and Local Government announced the Provisional Local Government Finance Settlement for 2025/26 which provided details on the proposed grant allocations to Councils, together with other measures aimed at supporting Council finances. The provisional settlement set out that Local Government Core Spending Power was increasing by an average of 6% (6.5% in 2024/25), made up mostly of increased council tax flexibilities and additional grant.

The settlement was announced for one year only. There were some significant changes to the different grant funding streams that were announced alongside confirmation of some new grants and their proposed allocations and some grant funding ceasing. The settlement also confirmed that the Council Tax referendum thresholds and Adult Social Care levy limits would remain the same for 2025/26.

Grants confirmed as ceasing were Rural Services Delivery Grant (£4.503m received in 2024/25), Services Grant (£0.404m received in 2024/25) and Minimum Funding Guarantee (£1.289m received in 2024/25), with a total loss of funding from these grants ceasing of £6.196m. These had previously been assumed as continuing as government had not confirmed previously that these would stop.

The council has also seen a reduction in New Homes Bonus grant of £0.784m, which is less than the reduction expected, and will be paid £1.687m. It has been confirmed that this is the last year of payments of New Homes Bonus Grant and this grant would cease to be paid in the second financial year of the MTFS period (from 2026/27).

Revenue Support Grant (RSG) was confirmed to increase with an additional grant for the council rolled into RSG that was previously allocated separately (Extended Rights to [home-to-school] Travel). The council will receive £1.576m in RSG, an increase of £0.130m from 2024/25 across the 2 previously allocated grants.

New funding nationally worth £3.7bn in 2025/26 was announced as additional funding for social care. Of that £640m is distributed as part of the existing Social Care Grant and the council is set to receive an additional £4.861m in 2025/26 from this funding.

A new Children's Social Care Prevention Grant was announced and was confirmed to include previous grants distributed through Family Help/Supporting Families, Accommodation Reforms, Staying Put, Virtual Schools Heads, Leaving Care Allowance and Personal Advisor Support grants. The council is set to receive £2.296m. In 2024/25 these grants totalled £2.390m so the council faces a loss of £0.094m

A new Recovery Grant was also announced with £600m allocated nationally. This grant was set out to support councils targeted towards councils with greater need and demand for services and was allocated based on a combination of deprivation indicators and an assessment of councils council tax raising abilities. The council did not receive any of this new funding.

The Council also receives funding for specific service delivery from Government and these are budgeted for within the services net budget. The significant grants are detailed in the table below.

Specific Grants held in the Services Net Budget Total	2025/26
	£ m
Public Health Grant	19.152
Domestic Abuse Grant	1.078
Drug & Alcohol Treatment and Recovery Improvement Grant	1.215
Individual Placement and Support Grant	0.166
Smokefree Grant	0.553
Market Sustainability (MSIF)	7.976
Other Adult Care Grants	0.726
Homelessness Prevention Grant	2.372
Rough Sleeping Prevention & Recovery	0.627
Home Office - Police & Crime Panel	0.065
NNDR Admin Grant	0.644
Housing Benefit Admin subsidy	0.850
Warm Home	0.600
Local Authority Bus Subsidy (BSOG)	0.985
Bus Service Improvement Plan (BSIP)	3.259
Dedicated Schools Grant	551.890
Pupil Premium for LAC Grant (unconfirmed)	0.924
Unaccompanied Asylum Seeking Children & Young People	3.664
Youth Justice Board Grant (unconfirmed)	0.504
Regional Improvement and Innovation Alliance (South West)	0.346
Adult Education Board	0.534
Connect to Work (Swindon & Wiltshire)	1.440
Other smaller childrens services grants	0.232
Bikeability	0.168
UK Shared Proseperity Fund	1.529
Careers Hub	0.250
Growth Hub Core Funding	0.261
Specific Grants In the Services	602.009

Wiltshire Council receives the Better Care Fund contribution from the ICB (Integrated Care Board). In 2024/25 this minimum contribution was £40.335m. This will be uplifted in 2025/26, the schemes that this will be allocated to will be approved through the partnership governance arrangements.

#### **Summary Forecast Resources**

Based on the above assumptions the total core funding available for the Council to deliver services in 2025/26 is £527m.

Going forward in the MTFS it is anticipated that Government grant will remain, mainly for social care, however a level of uncertainty remains around the assumption on other government grants and quantum of funding, particularly as the settlement has confirmed funding for 2025/26 only and funding reforms are expected during the

year. The additional income from council tax will see the overall resources continue to increase to £566m by 2027/28.

	2025/26 £m	2026/27 £m	2027/28 £m
Council Tax	313.306	327.183	340.895
Social Care Levy	55.512	62.943	70.824
Business Rates	59.956	59.956	59.956
Collection Fund surplus	2.990	-	-
Specific Grants	95.656	94.075	94.075
Total Funding	527.420	544.157	565.750

This will form the basis of the Councils Net Revenue Budget and fund service spending plans over the next three years.

#### **SERVICE SPENDING PLANS**

#### **Service Spending Pressures**

As for any other organisation, the council experiences budget pressures as a result of inflation e.g. contractual and national staff pay awards, increasing demand for service provision and changes in legislation. The council has considered and made provision for spending pressures that are likely to materialise, totalling over £105m by 2027/28.

Some of these pressures have been reported during the budget monitoring of the current 2024/25 financial year and require base budget funding so are built into the budget as prior year inflation pressures. The vast majority of these pressures are expected to arise based on the current assumptions and estimates including nearly £13.3m of contractual inflation and £5.3m of pay inflation, and additional demand of just over £20.1m in 2025/26.

#### Pay inflation

Pay inflation includes the national pay award. In 2025/26 £5.3m has been budgeted for the pay award for 2025/26, which is current estimated as a 3% increase. The following two years pay awards have been estimated at 2.5%.

In line with the budget assumptions included originally in 2023/24 budget a 6.5% vacancy factor continues to be applied to all services and included within the 2025/26 base budget.

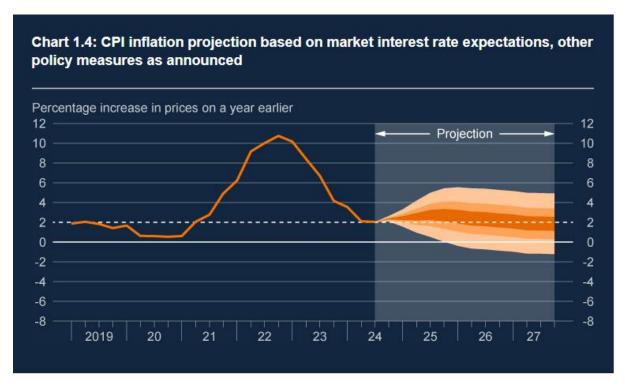
#### **Contractual inflation**

The total contract inflation arising over the next three years is estimated to be circa £33.1m, with £13.3m estimated in 2025/26.

The Council budgets for inflation based on the indices that those supplies and services are contractually linked to. For strategic budget planning purposes, we look to hold this to Consumer Price Index (CPI) but specific contracts will have different indices aligned to them, and as the approach towards inflation management within

contracts varies across the organisation, actual pressures identified by services uses those inflation indices identified.

The majority of contracts are linked to CPI and the council uses the Bank of England (BoE) forecast issued in November of the preceding year to estimate the CPI rate. The chart below is an extract of the CPI inflation forecast issued by the BoE in the November 2024 MPC report.



Given the previous high levels of inflation above that anticipated, significant level of uplifts have been applied in the previous years and the forecast provided above the average CPI that is being used in 2025/26 for contractual inflation is 2.2%, and this will fall back down to 2% from 2026/27 onwards. There are outliers for forecasts on inflation, most notably these remain around energy prices.

#### **Demand for Services**

Demand for services the council provides is driven dependent on a specific service, for Waste Management it is driven through the number of households and the total tonnage of Waste produced, for Adult Social Care the number of residents requiring packages of care or placements. For the latter an ageing demographic will have a significant impact on the amount of demand predicted to arise.

The base budget is set assuming a level of demand for services using the current financial year forecasts and based on latest evidence and trends. For 2025/26 revisions have been made to the base budget to accurately revise the level of base budget to reflect current demands in some services, with the most significant increases seen in Adults Services, Children's Social Care and SEND and SEND Transport.

#### **SAVINGS**

Savings were identified as part of last year's budget setting process that included savings across the MTFS period 2024/25-2026/27 to enable business plan priorities to be delivered and also for the Councils finances to be managed and move to a sustainable footing. Some of the savings to be delivered in 2025/26 have been assessed as not being able to be delivered or the timing of delivery has been assessed as being different from that originally expected.

The cost containment approach that has been taken identified £12.802m of savings and additional saving proposals have been put forward that total £5.634m over the MTFS.

The detail proposal for savings by each service are shown in annex 7 of this appendix.

#### **CAPITAL PROGRAMME**

The Capital Programme is detailed in annex 9, and a summary is provided below.

Service	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Corporate Director - People	64.329	25.909	18.465	15.200	123.903
Corporate Director - Resources	50.307	46.490	14.083	26.366	137.246
Corporate Director - Place	97.650	80.952	62.046	268.150	508.798
Total General Fund	212.286	153.351	94.594	309.716	769.947
Housing Revenue Account	41.109	58.186	39.441	90.173	228.909
Total Capital Programme	253.395	211.537	134.035	399.889	998.856

Funding	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Grants	78.273	61.117	48.856	239.424	427.670
Other Contributions	0.627	0.565	-	32.090	33.282
S106 Contributions	6.138	4.400	0.100	-	10.638
CIL Contributions	22.223	6.345	-	-	28.568
HRA	41.108	58.186	39.441	90.173	228.908
Capital Receipts	0.481	1.075	0.250	0.500	2.306
Stone Circle Loans	16.519	4.119	0.141	0.472	21.251
Revenue Contribution to Capital	9.280	0.597	-	-	9.877
Borrowing	78.746	75.133	45.247	37.230	236.356
Total Funding	253.395	211.537	134.035	399.889	998.856

New schemes totalling £10.609m will be added to the Capital Programme, these schemes are detailed in the tables below. The revenue financing of new schemes that are funded from borrowing has been factored in the pressures of the MTFS.

Scheme Name	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Highways - Plant and Equipment	0.089	0.106	0.099	0.211	0.505
SA&FM - Maltings Car Park, Salisbury	0.300	0.180	-	-	0.480
SA&FM - Non-operational Assets	0.250	0.250	0.250	1.000	1.750
SA&FM - Inflation	0.206	0.206	0.206	0.825	1.444
SA&FM - 5 Year Maintenance Plan	1.126	1.126	1.126	2.252	5.630
Hindon Stagger	0.800	-	1	-	0.800
Total Funding	2.771	1.868	1.682	4.288	10.609

#### **RESERVES**

The Council holds reserves to either undertake planned one off investment/spending or to deal with financial shocks/risk that face the authority in its operations.

The Cabinet has continued to be more transparent on the reporting of reserves held and has moved the Council to holding reserves that are commensurate with the level of financial risk being faced and to take opportunities as they present to ensure adequate monies are set aside to mitigate risks so that plans and priorities can be delivered.

The General Fund Reserve is the Councils reserve held to deal with all financial shocks, whatever they may be. The table below shows the estimated opening balance and the forecast future year balances as a result of taking opportunities as they arise, balances have increased to bring the reserve up to the risk assessed level, and there is no current plan to continue to increase the balance on this reserve.

Year Ended 31 March	2024/25	2025/26	2025/26	2025/26
	£m	£m	£m	£m
Opening Balance	34.056	34.522	34.522	34.522
Transfer from Earmarked Reserves	0.466	-	-	-
Closing Balance	34.522	34.522	34.522	34.522

Annex 8 provides the full detail on the general fund risk assessment. As part of the budget setting process for 2024/25 the balance of the Collection Fund Volatility Reserve was amalgamated with General Fund Reserve so that the risk on this local taxation income and the risk of future deficits will be managed as a general financial risk. Also included in general financial risks is the risk of the pay award being settled higher than budgeted and therefore the risk assessment value is now met by the General Fund Reserve and the Pay Award Reserve with residual amounts in the Latent Demand and Collection Fund Volatility reserve.

#### Reserves Held Against Assessed Financial Risk

Year Ended 31 March	2024/25	2025/26	2026/27	2027/28
	£m	£m	£m	£m
General Fund	34.056	34.522	34.522	34.522
Collection Fund Volatility	0.221	0.575	-	-
Pay Award	0.700	0.700	0.700	0.700
Latent Demand	2.570	0.123	(0.000)	(0.000)
Opening Balance	37.547	35.920	35.222	35.222
Net Movement on General Fund	-	-	-	-
Planned transfers of Collection Fund	0.354	(0.575)	-	-
Estimated use of Pay Award	-	-	-	-
Estimated use of Latent Demand	(2.447)	(0.123)	-	•
Closing Balance	35.454	35.222	35.222	35.222
Represented By:				
General Fund	34.522	34.522	34.522	34.522
Collection Fund Volatility	0.575	-	-	-
Pay Award	0.700	0.700	0.700	0.700
Latent Demand	0.123	(0.000)	(0.000)	(0.000)
Closing Balance	35.920	35.222	35.222	35.222
Risk Assessed Balance*	33.990	34.640	34.640	34.640
Cover	104%	102%	102%	102%

The Council also holds Earmarked Reserves to deliver on planned or ringfenced spending. The table below provides details on the total level of reserves held by the Council, including Earmarked Reserves as well as Dedicated Schools Grant (DSG) and school balances.

Reserve	Projected Closing Balance 2024/25 £'m	Projected Closing Balance 2025/26 £'m	Projected Closing Balance 2026/27 £'m	Projected Closing Balance 2027/28 £'m
General Fund	34.522	34.522	34.522	34.522
Latent Demand	0.123	-	-	-
Collection Fund Volatility	0.575	-	-	-
Public Health	5.707	5.133	4.547	4.547
Homes for Ukraine	4.978	2.978	0.978	0.000
Transformation	6.995	2.618	0.589	0.863
Business Plan Priority	0.771	-	-	-
Highways Improvements Works	5.705	-	-	-
Pay Award	0.700	0.700	0.700	0.700
PFIs	4.346	3.613	2.847	2.847
Insurance	8.016	7.516	7.016	7.016
Accommodation Needs	2.895	0.895	-	-
High Needs	18.209	18.209	18.209	18.209
Other Earmarked	21.359	14.212	12.742	12.772
Total Earmarked	80.380	55.875	47.627	46.954
Schools Balances	11.028	8.528	6.528	4.528
DSG	(66.232)	(96.045)	(118.701)	(131.282)
TOTAL	59.697	2.879	(30.025)	(45.279)

#### **Annexes**

Annex 1 – Service Budget Targets 2025/26

Annex 2 – MTFS Service Totals 2025/26 to 2027/28

Annex 3 – Detail by Service on Prior Year Budget Changes

Annex 4 – Detail by Service on Funding, Technical and Other Adjustments. Pay Award & Investment

Annex 5 – Detail by Service on Contractual Inflation

Annex 6 – Detail by Service on Demand Changes

Annex 7 – Detail by Service on Saving Proposals

Annex 8 – General Fund Reserve Risk Assessment 2025/26

Annex 9 – Capital Programme 2025/26 to 2031/32

#### Wiltshire Council - MTFS Model 2025/26 to 2027/28 Annex 1 - Service Budget Summary 2025/26

Analysis of Movement in the 2024-25 Budget to the Proposed 2025-26 Budget

Analysis of Movement in the 2024-25 Budget to the Proposed 2025-26 Budget										
Service	2024/25 Budget £m	Funding Changes £m	Technical Adjustment s £m	Pay Award £m	Prior Year Pressures £m	Contractual Inflation £m	Demand £m	2025/26 Savings Proposals £m	2025/26 Budget £m	Change in Budget £m
Adult Services	179.614	-	3.225	1.060	10.455	4.458	3.875	(8.237)	194.450	14.836
Public Health	-	-	-	-	-	-	-	-	_	-
Education & Skills	38.682	-	-	0.427	0.354	0.407	(1.250)	(0.779)	38.080	(0.602)
Families & Children Services	70.675	-	0.095	0.857	2.146	1.765	1.903	(2.399)	75.042	4.367
Commissioning	4.306	-	-	0.139	(0.052)	-	-	-	4.393	0.087
Corporate Director People Total	293.277	-	3.320	2.483	12.904	6.629	4.527	(11.414)	311.965	18.689
Finance & Procurement	7.868	-	-	0.276	0.482	0.016	0.446	(0.254)	8.834	0.966
Assets	18.089	-	-	0.138	0.343	1.225	0.190	(0.310)	19.675	1.585
Information Services	12.664	-	-	0.219	0.953	0.369	(0.296)	(0.071)	13.837	1.173
HR&OD	4.169	-	-	0.202	(0.024)	0.005	-	(0.126)	4.226	0.057
Transformation & Business Change	-	-	-	0.086	(0.030)	-	0.290	(0.070)	0.277	0.277
Corporate Director Resources Total	42.790	-	-	0.921	1.725	1.615	0.629	(0.831)	46.849	4.058
Highways & Transport	43.803	-	0.909	0.348	0.032	0.976	(1.962)	(0.679)	43.427	(0.376)
Economy & Regeneration	2.526	-	-	0.045	(0.019)	-	0.043	(1.000)	1.595	(0.930)
Planning	2.799	-	-	0.294	(0.101)	-	0.150	(0.212)	2.930	0.131
Environment	49.582	-	-	0.175	(1.351)	1.923	(0.306)	(0.438)	49.584	0.003
Leisure Culture & Communities	5.379	-	-	0.644	0.019	(0.589)	(0.780)	(0.652)	4.020	(1.359)
Corporate Director Place Total	104.088	-	0.909	1.506	(1.420)	2.309	(2.854)	(2.981)	101.557	(2.531)
Legal & Governance	10.425	-	0.390	0.320	(0.079)	0.026	-	(0.809)	10.273	(0.152)
Corporate Directors & Members	3.292	-	-	0.079	0.515	-	0.181	(0.130)	3.937	0.645
Chief Executive Directorates Total	13.718	-	0.390	0.399	0.435	0.026	0.181	(0.939)	14.210	0.493
Movement on Reserves	3.910	(4.857)	-	-	-	-	5.743	-	4.795	0.886
Finance & Investment Income & Expense	25.786	-	-	-	-	0.062	11.120	-	36.968	11.182
Corporate Costs	3.165	-	-	-	0.134	2.590	0.750	0.800	7.439	4.274
Corporate Levies	3.564	-	-	-	-	0.073	-	-	3.637	0.073
Corporate Total	36.425	(4.857)	-	-	0.134	2.724	17.613	0.800	52.839	16.414
Grand Total	490.298	(4.857)	4.619	5.309	13.778	13.303	20.096	(15.365)	527.420	37.122
Council Tax Requirement	(302.623)	(10.683)	-	-	-	-	-	-	(313.306)	(10.683)
Social Care Levy	(48.453)	(7.059)	-	-	-	-	-	-	(55.512)	(7.059)
Rates Retention	(56.460)	(3.496)	-	-	-	-	-	-	(59.956)	(3.496)
Collection Fund (surplus) / deficit	1.503	(4.493)	-	-	-	-	-	-	(2.990)	(4.493)
Specific Grants	(84.266)	(6.772)	(4.619)	-	-	-	<u>-</u>	-	(95.656)	(11.391)
Funding Total	(490.298)	(32.503)	(4.619)	-	-	-	-	-	(527.420)	(37.122)
Funding GAP									_	_

### Wiltshire Council - MTFS Model 2025/26 to 2027/28 Annex 2 - Service Budget Totals 2025/26 to 2027/28

Service	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m
Adult Services	194.450	202.327	209.462
Public Health	-	-	-
Education & Skills	38.080	40.885	43.877
Families & Children Services	75.042	76.430	78.064
Commissioning	4.393	4.517	4.638
Corporate Director People Total	311.965	324.160	336.041
Finance & Procurement	8.834	9.108	9.369
Assets	19.675	20.236	20.567
Information Services	13.837	14.195	14.560
HR&OD	4.226	4.401	4.577
Transformation & Business Change	0.277	1.561	2.638
Corporate Director Resources Total	46.849	49.500	51.710
Highways & Transport	43.427	44.350	45.212
Economy & Regeneration	1.595	1.636	1.675
Planning	2.930	2.733	2.990
Environment	49.584	51.058	52.702
Leisure Culture & Communities	4.020	3.915	3.626
Corporate Director Place Total	101.557	103.692	106.205
Legal & Governance	10.273	10.583	10.888
Corporate Directors & Members	3.937	4.014	4.094
Chief Executive Directorates Total	14.210	14.597	14.982
Movement on Reserves	4.795	7.672	7.672
Finance & Investment Income & Expense	36.968	38.381	39.713
Corporate Costs	7.439	6.507	6.577
Corporate Levies	3.637	3.710	3.786
Corporate Total	52.839	56.270	57.749
Grand Total	527.420	548.220	566.687
Council Tax Requirement	(313.306)	(327.183)	(340.895)
Social Care Levy	(55.512)	(62.943)	(70.824)
Rates Retention	(59.956)	(59.956)	(59.956)
Collection Fund (surplus) / deficit	(2.990)	-	-
Specific Grants	(95.656)	(94.075)	(94.075)
Income/Funding Total	(527.420)	(544.157)	(565.750)
Funding GAP	-	4.063	0.937

Corporate Directorate	Service	Description				
			£m			
ALL	ALL	Impact of 2024/25 agreed Pay Award	(1.000			
Corporate Director People	Adult Services	Inflationary and demand pressures 2024/25	8.629			
Corporate Director People	Adult Services	Unachievable Saving - PEO-ASC-2 - Reduction in 12 hour block domiciliary care	0.380			
Corporate Director People	Adult Services	Unachievable Saving - PEO-LAW-35 - Transformation of Community Support	0.400			
Corporate Director People	Adult Services	Unachievable Saving - PEO-LAW-11 - Market Intervention into Home Care	0.500			
Corporate Director People	Adult Services	Unachievable Saving - PEO-LAW-14 - TEC Transformation	0.075			
Corporate Director People	Adult Services	Unachievable Saving - PEO-LAW-5 - Help to Live at Home (homecare) Alliance	0.150			
Corporate Director People	Adult Services	Unachievable Saving - PEO-WLP-20 - TEC ENABLED CARE	0.050			
Corporate Director People	Adult Services	Unachievable Saving - PEO-WLP-21 - Transitions Service	0.500			
Corporate Director People	Education & Skills	Revised estimate of SEN transport demand based on increase in specialist planned places in special schools and resource bases in both primary and secondary mainstream schools	0.070			
Corporate Director People	Education & Skills	Increase in the on going pension payments relating to school staff	0.174			
Corporate Director People	Education & Skills	Review of school improvement delivery following the DfE removal of academisation directive for all schools to be part of a multi academy trust by 2030	0.12			
Corporate Director People	Families & Children's Services	Reflects placement price mix on support and placements for children and young people required in the 2025/2026 base	2.378			
Corporate Director Resources	Finance & Procurement	Application of budget to support the Local Welfare Provision Policy	0.162			
Corporate Director Resources	Finance & Procurement	Increased demand around housing benefit and discretionary housing payment	0.289			
Corporate Director Resources	Finance & Procurement	Accounts payable domiciliary care team requirement	0.096			
Corporate Director Resources	Assets	Refreshed plans to utilise Council HUB buildings for services and staff returning to the workplace	0.000			
Sama anata Dinastan Bassanas	Appete	Chrotonia I and probin in bookh and anfatr.	0.021			
Corporate Director Resources	Assets	Strategic Leadership in health and safety	0.027			
Corporate Director Resources	Assets	Budget reset with repairs and maintenance across the Council estate	0.333			
Corporate Director Resources	Information Services	Implementation of Oracle & on going SAP costs above existing budget	0.778			
Corporate Director Resources	Information Services	New system in Planning requires additional budget	0.054			
Corporate Director Resources	Information Services	New cloud based system in Legal requires additional budget	0.018			
Corporate Director Resources	Information Services	Contractual uplifts for Applications, Phones and Network Support Contracts and Licences.	0.199			
Corporate Director Resources	HR & OD	Strategic Leadership in occupational health	0.027			
Corporate Director Resources	Transformation & Business Change	Removal of a traded training offering on specific Systems Thinking skills to external customers from April 2023	0.006			

#### **APPENDIX 1**

### Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28 Annex 3 – Detail by service on Prior Year Base Budget Changes

Corporate Directorate	Service	Description	2025/26
			£m
Corporate Director Place	Highways & Transport	Contractual uplifts Ringway/Atkin 4% 2%, 2%, Other 3%, 2%, 2% , Fuel 10%, 10%, 10%	(0.377)
Corporate Director Place	Highways & Transport	Contractual uplifts for transport contracts Milestone 4% 3.5%, 3.5%. Fuel CPI 2.2%, 2%, 2%	0.408
Corporate Director Place	Highways & Transport	Cash collection contract - 41% and 2%	(0.005)
Corporate Director Place	Highways & Transport	Cash collection contract. 24/25 pressure from new contract, 2% future years	0.079
Corporate Director Place	Environment	Contractual uplifts for Waste contracts based on rebased tonnages 23/24 Qtr 2 average 4.15%, 2.04%, 1.52%, Lakeside/MBT 4%, 4%, 4%	(2.147)
Corporate Director Place	Environment	CPI 2.2%, 2%, 2% applied to contracts. 4% Lakeside/MBT 21.65% increase on landfill tax gate fee	
			1.609
Corporate Director Place	Environment	Household Recycling Centres, haulage and paint disposal	(0.758)
Chief Executive Directorates	Corporate Directors & Members	Correction of Base Budget	0.530
Prior Year Base Changes Total			13.778

Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28

Annex 4 – Detail by service on Funding Changes and Technical and other Adjustments in the Service

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director People	Adult Services	Move ASC Discharge funding into iBCF as per provisional settlement	2.393	-	-
Corporate Director People	Adult Services	Young People with SEN Social Care Needs - Transition to adults aged 18	0.832	0.558	-
Corporate Director People	Families & Children's Services	Move CSC grant income to funding	1.317	-	-
Corporate Director People	Families & Children's Services	Young People with SEN Social Care Needs - Transition to adults aged 18	(0.832)	(0.558)	-
Corporate Director People	Families & Children's Services	External legal fees to be managed by Legal and Governance	(0.390)	-	-
Corporate Director Place	Highways & Transport	Move Extended Rights to School Transport Income Budget to Funding	0.635	-	-
Corporate Director Place	Highways & Transport	Increase Extended Rights to School Transport Expenditure Budget to Reflect Provisional Settlement	0.274	-	-
Chief Executive Directorates	Legal & Governance	External legal fees to be managed by Legal and Governance	0.390	-	-
<b>Funding and Technical Adjustment C</b>	hanges Total		4.619	-	-

Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28 Annex 4 – Detail by service on Pay Award Changes

Corporate Directorate	Service	Description	2025/26	2026/27	2027/28
All	All	Pay Award 3% for 2025/26, 2.5% for 2026/27 and 2.5% for 2027/28	£m	£m	£m
			5.309	4.752	4.687
Pay Award Total			5.309	4.752	4.687

### Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28 Annex 5 – Detail by service on Contractual Inflation

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director People	Adult Services	Adult Services contractual uplifts in line with contractual arrangements.	3.749	4.276	4.523
Corporate Director People	Adult Services	Adults Contractual Variances	0.710	0.710	-
Corporate Director People	Adult Services	Annual Increase - Client Contributions	-	-	(0.686)
Corporate Director People	Education & Skills	Inflation on SEND school transport routes as per contractual arrangements at 3%, 2% and 2%	0.360	0.401	0.435
Corporate Director People	Education & Skills	Inflation on SEN commissioned services including Short Breaks	0.039	-	-
Corporate Director People	Education & Skills	Inflation on traded income	0.008	0.005	(0.036)
Corporate Director People	Families & Children's Services	Contractual Inflation for SVPP Partnership (4.5%, 2%, 2%)	0.002	0.002	0.002
Corporate Director People	Families & Children's Services	Reflects the partnership contribution increase required to fund pay inflation at Council estimates for the Youth Offending Partnership (3%, 2%, 2%)	0.020	0.018	0.018
Corporate Director People	Families & Children's Services	Contractual Inflation for the Adoption West Contract (3%, 2%, 2%)	0.050	0.045	0.021
Corporate Director People	Families & Children's Services	For internal carer and permenance arrangement payments, staff pay awards are mirrored as an inflation assumption at 3%, 2.5% & 2.5%	0.075	0.040	0.004
Corporate Director People	Families & Children's Services	Reflects existing framework agreements and current placements with a range of inflation rates for off framework and spot purchases for independent fostering agency placements	0.275	0.243	0.231
Corporate Director People	Families & Children's Services	Reflects existing framework agreements and current placements with a range of inflation rates for off framework and spot purchases for 16-25 Support & Accommodation	0.768	0.786	0.792
Corporate Director People	Families & Children's Services	Reflects existing framework agreements and current placements with a range of inflation rates for off framework and spot purchases for Support and Accommodation and other arrangements for Asylum Seeking Children & Young People	0.134	0.134	0.162
Corporate Director People	Families & Children's Services	Reflects existing framework agreements and current placements with a range of inflation rates for off framework and spot purchases for social care support and accommodation, domiciliary care and direct payments for young people with SEND			
Corporate Director Resource	s Finance & Procurement	Contractual uplifts Revenues & Benefits Postage contract.	0.350	0.371	0.393
			0.007	0.007	-

### Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28 Annex 5 – Detail by service on Contractual Inflation

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director Resources	Finance & Procurement	Inflation on postage contract and IT system	0.009	0.007	0.013
Corporate Director Resources	Assets	Updated inflation assumptions - CPI applied bar electricity 10%, maintenance 7.5% and water 10%	1.225	0.819	0.486
Corporate Director Resources	Information Services	Contractual uplifts for Applications, Phones and Network Support Contracts and Licences.	0.548	0.168	0.174
Corporate Director Resources	Information Services	Inflation baseline review	(0.179)	0.100	0.174
Corporate Director Resources	HR & OD	Inflation uplifts on payslips production, ICT support and promotions/marketing	0.005	0.003	0.003
Corporate Director Place	Highways & Transport	Contractual uplifts Ringway/Atkin 4% 2%, 2%, Other 3%, 2%, 2%, Fuel 10%, 10%, 10%	0.232	0.211	0.218
Corporate Director Place	Highways & Transport	Fees & Charges CPI increase	(0.070)	(0.070)	-
Corporate Director Place	Highways & Transport	Contractual uplifts for transport contracts Milestone 4% 3.5%, 3.5%. Fuel CPI 2.2%, 2%, 2%	0.289	0.242	0.250
Corporate Director Place	Highways & Transport	Contractual uplifts for transport contracts 2% contracts, Atkins 4%, 2%, 2%	0.005	0.003	0.003
Corporate Director Place	Highways & Transport	Contractual uplifts for transport contracts Atkins/ Milestone 4% 3.5%, 3.5%. 5% Energy	0.283	0.273	0.284
Corporate Director Place	Highways & Transport	Cash collection contract. 24/25 pressure from new contract, 2% future years	0.004	0.004	0.004
Corporate Director Place	Highways & Transport	Public Transport inflation 26/27 & 27/28 CPI 2%, 2%	-	0.153	0.156
Corporate Director Place	Highways & Transport	Mainstream Transport Inflation CPI 2.2%, 2%, 2%.	0.232	0.216	0.220
Corporate Director Place	Environment	Contributions to the AONB's	0.002	0.006	-
Corporate Director Place	Environment	CPI 2.2%, 2%, 2% applied to contracts. 4% Lakeside/MBT 21.65% increase on landfill tax gate fee	1.929	1.529	1.580
Corporate Director Place	Environment	Fees & Charges CPI increase	(0.010)	(0.010)	-
Corporate Director Place	Environment	Contractual uplifts for Public Protection contracts CPI 2.2%, 2%, 2%	0.001	0.003	0.003

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### Wiltshire Council Budget 2025/26 and Medium Term Financial Strategy 2025/26 to 2027/28 Annex 5 – Detail by service on Contractual Inflation

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director Place	Leisure Culture & Communities	Contractual uplifts for Leisure contracts, chemicals, cleaning products CPI 2.2%, 2%, 2%			
			0.019	0.019	0.019
Corporate Director Place	Leisure Culture & Communities	Leisure Fees and Charges increases			
			(0.608)	(0.400)	(0.400)
Chief Executive Directorates	Legal & Governance	Contractual uplift for Coroner contract			
			0.026	0.024	0.020
Corporate	Finance & Investment Income &	Monkton Park Barclays loan interest inflationary increase			
	Expense		0.062	0.063	0.065
Corporate	Corporate Costs	Contractual uplift for Audit and Insurance Premium			
J J			0.090	0.068	0.070
Corporate	Corporate Costs	Corporate Risk Budget			
5			2.500	-	-
Corporate	Corporate Levies	Contractual uplift for Apprenticeship and Flood Defence Levy			
4			0.073	0.073	0.076
Contractual Inflation Total			13.303	10.570	9.273

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director People	Adult Services	Adults increase in level of demand using POPPI & PANSI population projections and data analysis	5.192	5.119	5.468
Corporate Director People	Adult Services	Adults pressures to be funded from latent demand earmarked reserve	(0.710)	-	-
Corporate Director People	Adult Services	Adults pressures to be funded from latent demand earmarked reserve	(0.230)	-	-
Corporate Director People	Adult Services	Adults pressures to be funded from latent demand earmarked reserve	(0.103)	-	-
Corporate Director People	Adult Services	Contribution to Staff Costs	(0.171)	0.171	-
Corporate Director People	Adult Services	Additional Deferred Loan Income	(0.053)	-	-
Corporate Director People	Adult Services	Self Funder Admin & Management Fees	(0.050)	-	-
Corporate Director People	Education & Skills	Estimate of SEN transport demand based on increase in specialist planned places in special schools and resource bases in both primary and secondary mainstream schools	2.273	1.680	1.731
Corporate Director People	Education & Skills	Inclusion & SEND - Planned increase in statutory service staffing over the MTFS to align to increase in demand plus recruitment strategy impact	0.275	0.379	1.731
Corporate Director People	Education & Skills	Additional Investment in SEND Funding from Final Settlement	(3.798)		_
Corporate Director People	Education & Skills	Review of traded services	(3.730)		0.090
Corporate Director People	Families & Children's Services	CSC New Burdens	0.500		0.000
Corporate Director People	Families & Children's Services	New CSC Grant	0.294	-	-
Corporate Director People	Families & Children's Services	Pressures of Latent Demand Ear Marked Reserve Childrens Social Care Placements	3.23		
Corporate Director People	Families & Children's Services	Pressures for Latent Demand Ear Marked Reserve for Families & Children	(0.201)	-	-
Corporate Director People	Families & Children's Services	Care Leavers statutory duty to 25 years continues however more Care Leavers are receiving support for longer periods	0.028	-	-
Corporate Director People	Families & Children's Services	Reflects estimates for internal care placements including in house foster carers; Special Guardianship Orders and Adoption Allowances	0.068	0.313	0.399

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Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director People	Families & Children's Services	Reflects estimates for external care placements; independent foster carers and external residential care placements (within the overall numbers in care)	0.176	(0.501)	(0.694)
Corporate Director People	Families & Children's Services	Reflects estimates for Support and Accommodation and other arrangements for asylum seeking children and young people	0.325	0.291	0.127
Corporate Director People	Families & Children's Services	Unaccompanied Asylum Seeking Children and Young People Grant income estimate	(0.077)	(0.103)	
Corporate Director People	Families & Children's Services	Young People with SEN Social Care Needs - Transition to adults	0.121	(0.103)	
Corporate Director People	Families & Children's Services	Reflects estimates for Support and Accommodation and other arrangements for Care Leavers	0.799	-	-
Corporate Director People	Families & Children's Services	Canons House - revenue costs of extended property	-	0.526	
Corporate Director People	Families & Children's Services	Reflects estimates for social care support and accommodation, domiciliary care and direct payments for young people with SEND	0.952	_	_
Corporate Director Resources		Additional Finance Resource for statutory functions and controls	0.084	-	-
Corporate Director Resources		Introduction of budget to support the Local Welfare Provision Policy	0.150	-	-
Corporate Director Resources Corporate Director Resources		Housing benefit and discretionary housing payment  Accounts payable domiciliary care team requirement	0.152	-	-
Corporate Director Resources		Estimated costs arising from the depot strategy	0.060	- 0.000	- 0.274
Corporate Director Resources	Assets	Strategic Leadership in health and safety	0.012	0.080	0.374
Corporate Director Resources	Assets	Refreshed heath and safety requirements; personal safety devices and system costs		0.141	
Corporate Director Resources	Assets	New area of spend related to compliance and undertaking thorough inspections of all lifts and pressure systems	0.100	U.141	

Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director Resources	Assets	Additional area of spend related to Concerto development for SFG20, compliance and PPM	0.050	(0.050)	-
Corporate Director Resources	Information Services	Oracle Licencing and Support costs, net increase over current system costs	(0.029)	(0.000)	-
Corporate Director Resources	Information Services	Implementation of Oracle & on going SAP costs above existing budget	(0.267)	_	_
Corporate Director Resources	Transformation & Business Change	Baseline the existing transformation service	(0.201)	1.265	1.000
Corporate Director Resources	Transformation & Business Change	Expansion of the data and insights service	0.290	-	
Corporate Director Place	Highways & Transport	Local Highways Pressures to be funded from Business Priority Reserve	(0.568)	-	-
Corporate Director Place	Highways & Transport	Ash Dieback	-	0.100	-
Corporate Director Place	Highways & Transport	Highways Operations Pressures to be funded from Business Priority Reserve	(0.150)	-	-
	Highways & Transport	Rural Play Areas Funding from Final Settlement	(0.603)	-	-
	Highways & Transport	Sustainable Transport Staffing Growth to manage capacity issues	(0.215)	-	-
·	Highways & Transport	Local Plan Transport Model Update	-	0.150	0.300
	Highways & Transport	Streetworks income	(0.475)	-	-
	Highways & Transport	S106 contributions  DRT Scheme - Rural Mobility Grant funding ending	(0.250)	0.250	-
Corporate Director Place  Corporate Director Place	Highways & Transport Highways & Transport	Park & Ride re-tender	0.156	0.135	-
	Highways & Transport	Salary pressures from expired grant and previous years budget reductions	-	0.277	_
<u> </u>	Highways & Transport	Re tender / termination on public & mainstream contracts	0.309	-	-
Corporate Director Place	Highways & Transport	Additional BSIP grant income 2025/26 - £94k capacity funding offsetting salary	0.169	-	-
		pressures, £84.3k 25/26 public contract re-tender pressure, £156k 25/26 DRT Scheme, balance £824.2k to reserves	(1.159)	-	-

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Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director Place	Highways & Transport	Balance of BSIP 25/26 funding to reserve. 26/27 drawdown from reserve to cover £152.9k inflation, £277k P&R re-tender, £135k DRT scheme. 27/28 drawdown from reserve to cover £155.9k inflation			
Corporate Director Place	Economy & Regeneration	Rural Housing Needs Survey	0.824	(0.565)	(0.156)
Corporate Director Place	Planning	Anticipated reduction in planning appeal costs once the council secures an updated Local Plan	(0.100)	(0.170)	<u> </u>
Corporate Director Place	Planning	Development Management Pressures to be funded from Business Priority Reserve	(0.100)	(0.140)	_
Corporate Director Place	Planning	Additional funding to pay for updating evidence in preperation for revising the Minerals and Waste Local Plan and a new Local Plan under the governments new planning system	0.250	-	_
Corporate Director Place	Environment	Local Nature Recovery Partnership Contribution	0.015	_	_
Corporate Director Place	Environment	Additional resources to ensure ecology meets planning performance targets	0.033	0.033	_
Corporate Director Place	Environment	Waste Growth	_	0.170	0.174
Corporate Director Place	Environment	Garden waste collection fee increase	(0.300)	(0.085)	(0.129)
Corporate Director Place	Environment	Deposit Return Scheme (DRS) live from Oct 27 & will result in projected lost income of £490k a year. Part year pressure for 2027/28	(0.000)	(0.000)	0.245
Corporate Director Place	Environment	Additional staff to cover additional demand for climate consultation on planning policies			0.240
			0.048	-	-
Corporate Director Place	Environment	Air Quality Monitoring Funding from Final Settlement	(0.100)	-	-
Corporate Director Place	Environment	Public Protection Income growth	(0.015)	_	_
Corporate Director Place	Environment	Community Safety Partnership Manager	-	0.079	_
Corporate Director Place	Environment	Air Quality Monitoring & Customer Information	0.013	0.019	
Corporate Director Place	Leisure Culture & Communities	Volunteer Recruitment Funding from Final Settlement	(0.025)	-	
Corporate Director Place	Leisure Culture & Communities	Libraries Staffing	0.120	-	-

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Corporate Directorate	Service	Description	2025/26 £m	2026/27 £m	2027/28 £m
Corporate Director Place	Leisure Culture & Communities	Book fund	0.050	0.050	-
Corporate Director Place	Leisure Culture & Communities	Leisure Operations growth.	(0.925)	(0.200)	(0.250)
Chief Executive Directorates	Corporate Directors & Members	Corporate Director - Health & Wellbeing	0.181		-
Corporate	Movement on Reserves	Contribution to Waste Reserve from pEPR	5.743	1.929	-
Corporate	Finance & Investment Income & Expense	Capital Financing movements, covers MRP and Interest			
			11.120	1.350	1.267
Corporate	Corporate Costs	NI (Direct Employee) compensation estimated shortfall	0.750	-	-
Demand Total			20.096	12.674	9.946

Corporate Directorate	Service	Saving Proposal Description	2025/26 £m	2026/27 £m	2027/28 £m	TOTAL £m
Corporate Director People	Adult Services	Extending the Reablement offer through the adoption of the Homefirst Service into Wiltshire Council which will maximise independence and reduce dependency on formal care services.	(0.300)	-	-	(0.300)
Corporate Director People	Adult Services	Reablement model to deliver a community approach which delays/prevents the requirement for long term care.	(0.100)	-	-	(0.100)
Corporate Director People	Adult Services	Work with people whose capital has depleted to provide more timely advice and assessment.	(0.050)	-	-	(0.050)
Corporate Director People	Adult Services	In accordance with the Care Act (2014), a local authority must carry out an assessment of needs where it appears an adult may have needs for care and support. If there are eligible needs the Council must consider how these needs will be met through care and support planning. Within this process the Council can give consideration to achieving value for money. This does not mean choosing the cheapest option; but the one which delivers the outcomes desired for the best value. This option may not be the person's first choice of support.	(0.500)	-	-	(0.500)
Corporate Director People	Adult Services	Undertake Strength Based Reviews in the Living and Ageing Well Service to deliver individual outcomes, maximise community based opportunities and reduce reliance on formal care and support.	(0.100)	-	-	(0.100)
Corporate Director People	Adult Services	Taking a preventative approach and use of personal and community assets instead of formal care and support.	(0.100)	-	-	(0.100)
Corporate Director People	Adult Services	Client Contributions Increased Income - Client Contributions - increase income from the government annual increase to the amount payable to care packages by users	(0.494)	(0.507)	-	(1.001)

Corporate Directorate	Service	Saving Proposal Description	2025/26 £m	2026/27 £m	2027/28 £m	TOTAL £m
Corporate Director People	Adult Services	Continuing Health Care funding decisions . Ensuring individuals benefit from a personal health budget.	(0.600)	-	-	(0.600)
Corporate Director People	Adult Services	Joint funding policy implementation with ICB. Ensuring individuals benefit from a personal health budget.	(0.275)	-	-	(0.275)
Corporate Director People	Adult Services	To make full use of our specialist Optimising Care Team to reduce need for double handed formal care	(0.090)	-	-	(0.090)
Corporate Director People	Adult Services	Undertake Strength Based Reviews in the Living and Ageing Well Service to deliver individual outcomes, maximise community based opportunities and reduce reliance on formal care and support. Link to PEO-LAW-22	(0.180)	-	-	(0.180)
Corporate Director People	Adult Services	Taking a preventative approach and use of personal and community assets instead of formal care and support.	-	(0.100)	(0.100)	(0.200)
Corporate Director People	Adult Services	Ensuring day opportunity provision is locality based, person centred, offering opportunity to meet individual outcomes and presents best value to the council; to include enhanced use of in-house provision. Link to PEO-WLP-10	(0.750)	-	-	(0.750)
Corporate Director People	Adult Services	Ongoing review of Wiltshire Council's provision of in-house service, to enable use of these facilities to be maximised and the model developed to create more provision for community focused support. Link to PEO-ASC-8	(0.050)	-	-	(0.050)
Corporate Director People	Adult Services	Continuing Health Care funding decisions . Ensuring individuals benefit from a personal health budget.	(0.500)	-	-	(0.500)

Corporate Directorate	Service	Saving Proposal Description	2025/26 £m	2026/27 £m	2027/28 £m	TOTAL £m
Corporate Director People	Adult Services	Client Contributions Increased Income - Client Contributions - increase income from the government annual increase to the amount payable to care packages by users.	(0.161)	(0.165)	-	(0.326)
Corporate Director People	Adult Services	Learning Disabilities/Mental Health Placements - Working with the market in an outcome focused way to ensure independent living and ensuring people are appropriately placed.	(1.400)	-	-	(1.400)
Corporate Director People	Adult Services	Increased Use of Shared Lives which promotes supportive shared living. Shared Lives is a person centred and cost-effective way to support people to live fulfilled lives and represents best value.	(0.180)	-	-	(0.180)
Corporate Director People	Adult Services	The development of an outreach enablement model.	-	(0.150)	-	(0.150)
Corporate Director People	Adult Services	Undertake Strength Based Reviews in Whole Life pathway with a focus on Learning Disability services to deliver individual outcomes, maximise community based opportunities and reduce reliance on formal care and support. Link to PEO-LAW-22	(1.835)	-	-	(1.835)
Corporate Director People	Adult Services	Undertake Strength Based Reviews in Whole Life pathway with a focus on Mental Health services to deliver individual outcomes, maximise community based opportunities and reduce reliance on formal care and support. Link to PEO-LAW-22	(0.518)	-	-	(0.518)
Corporate Director People	Adult Services	Review of ASC - Use of Resources benchmarking, market opportunities and further demand management	-	(3.000)	(3.000)	(6.000)
Corporate Director People	Adult Services	Maximise use of leisure facilities to support outcomes for people with adult social care needs	(0.050)	-	-	(0.050)

Corporate	Service	Saving Proposal Description	2025/26	2026/27	2027/28	TOTAL
Directorate			£m	£m	£m	£m
Corporate Director People	Adult Services	Increased fees & charges for advertising income - Housing	(0.003)	(0.003)	-	(0.006)
Corporate Director People	Education & Skills	SEND Transport Delivery Board to develop independence for more children and young people with SEND, provide a wider range of options, and improve service delivery and efficiency.	(0.449)	-	-	(0.449)
Corporate Director People	Education & Skills	SEND Transport Delivery Board to develop independence for more children and young people with SEND, provide a wider range of options, and improve service delivery and efficiency.	(0.121)	-	-	(0.121)
Corporate Director People	Education & Skills	Traded income - inflationary review at 4.5%, 2.5% & 2.5%	(0.037)	(0.049)	-	(0.086)
Corporate Director People	Education & Skills	Traded prices reflect the MTFS pay estimates which need to be covered 4.5%, 2.5% & 2.5%	(0.022)	-	-	(0.022)
Corporate Director People	Education & Skills	A review of new cases of funded redundancies in schools based on historic usage	(0.150)	-	-	(0.150)
Corporate Director People	Families & Children's Services	Staff Savings to cover 2023/24 pay award cumulative impact	(0.029)	-	-	(0.029)
Corporate Director People	Families & Children's Services	Removal of two vacant posts in the social work teams	(0.118)	-	-	(0.118)
Corporate Director People	Families & Children's Services	Removal of 2 additional Social work vacancies in Support & Safeguarding	(0.058)	(0.060)	-	(0.118)
Corporate Director People	Families & Children's Services	Review caseload of social workers in the childrens disability team following introduction of family key worker roles	(0.056)	(0.057)	-	(0.113)
Corporate Director People	Families & Children's Services	Assessments work to be moved into the support & safeguarding teams - delete two assessment roles	(0.058)	(0.059)	-	(0.117)

Corporate	Service	Saving Proposal Description	2025/26	2026/27	2027/28	TOTAL
Directorate			£m	£m	£m	£m
Corporate Director People	Families & Children's Services	Badge family key worker posts against grant funding	(0.160)	-	-	(0.160)
Corporate Director People	Families & Children's Services	Estimate of additional health income to support children & young people with complex needs	(0.500)	(0.500)	(0.750)	(1.750)
Corporate Director People	Families & Children's Services	The is a Placement Sufficiency Programme of work underway between finance, commissioning and operational teams which will be responsible for making this saving, linked to more children placed with in house foster cares, with connected carers or in Independent Fostering Agency placements.	(0.350)	-	-	(0.350)
Corporate Director People	Families & Children's Services	The purchase of housing in Wiltshire will facilitate improved commissioning opportunities for placements for children and young people, including independence options for care experienced and asylum seeking young people	(0.557)	(0.378)	-	(0.935)
Corporate Director People	Families & Children's Services	Baseline the Staying Close practitioners to continue work of the pilot to support young people to move on from external residential childrens home	(0.360)		-	(0.360)
Corporate Director People	Families & Children's Services	Reunification of children with continuing financial special guardian or kinship support	(0.153)	(0.051)	-	(0.204)
Corporate Director Resources	Finance & Procurement	Funding of staff time supporting Ukraine grant activity	(0.101)	0.041	-	(0.060)
Corporate Director Resources	Finance & Procurement	Removal of a vacant post	(0.024)	(0.016)	-	(0.040)
Corporate Director Resources	Finance & Procurement	Reduction of external consultancy budget	(0.025)	(0.025)	-	(0.050)
Corporate Director Resources	Finance & Procurement	Expansion of e-billing solution for Revenues & Benefits and seeking other digital efficiencies	(0.044)	-	-	(0.044)

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Corporate	Service	Saving Proposal Description	2025/26	2026/27	2027/28	TOTAL
Directorate			£m	£m	£m	£m
Corporate Director	Finance &	Increased levels of court income	(0.060)	-	-	(0.060)
Resources	Procurement					
Corporate Director	Assets	Children Services service delivery changes that reduce property running	(0.010)	-	-	(0.010)
Resources		costs in Salisbury				
Corporate Director	Assets	Continued investment in energy efficiency projects to public buildings to	(0.300)	(0.050)	(0.050)	(0.400)
Resources		reduce energy consumption, generate renewable electricity, deliver savings and carbon emission reductions.				
Corporate Director	Assets	Trowbridge leisure centre reduced building operational cost	-	-	(0.100)	(0.100)
Resources						
Corporate Director	Assets	Asset rationalisation across the Council's estate	-	(0.500)	(0.500)	(1.000)
Resources						
Corporate Director Resources	Information Services	Azure Rationalisation, change in provision of cloud solutions to reduce costs	(0.010)	-	-	(0.010)
Corporate Director Resources	Information Services	Citrix Rationalisation	(0.031)	-	-	(0.031)
Corporate Director Resources	Information Services	Retire 0300 Numbers and Revert to Standard Geographic Phones Numbers	(0.030)	-	-	(0.030)
Corporate Director Resources  HR & OD Increase traded income. HR&OD currently trades a number of key services to schools and businesses, and there is an opportunity to retain and grow these activities to provide further income for the organisation.		(0.034)	-	-	(0.034)	
Corporate Director Resources	HR & OD	Staffing savings from removal of vacant posts and restructure	(0.092)	-	-	(0.092)
Corporate Director	Transformation &	Financing from one-off sources of flexible capital receipts and	(0.070)	(0.054)	-	(0.124)
Resources	Business Change	transformation reserve	()	()		()

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Corporate Directorate	Service	Saving Proposal Description	2025/26 £m	2026/27 £m	2027/28 £m	TOTAL £m
Corporate Director Place	Highways & Transport	Service Redesign	-	(0.100)	-	(0.100)
Corporate Director Place	Highways & Transport	Fleet Strategy and vehicle modernisation and travel savings	(0.114)	-	-	(0.114)
Corporate Director Place	Highways & Transport	Various maintenance and operational reviews to seek efficiencies and reductions	(0.080)	-	-	(0.080)
Corporate Director Place	Highways & Transport	Service Delegation of the Streetscene Service in Westbury	(0.210)	-	-	(0.210)
Corporate Director Place	Highways & Transport	New Central Depot contract saving	-	-	(0.050)	(0.050)
Corporate Director Place	Highways & Transport	Additional energy cost savings from Street Lighting	(0.250)	-	-	(0.250)
Corporate Director Place	Transport	Parking fee increases	-	(0.375)	(0.375)	(0.750)
Corporate Director Place	Highways & Transport	Maximise use of Rural Mobility Fund	0.100	-	-	0.100
Corporate Director Place	Highways & Transport	Review post 16 transport policy and working with FE providers for effective, efficient and sustainable future transport services	(0.125)	-	-	(0.125)
Corporate Director Place	Highways & Transport	Bus Network review	-	(0.300)	(0.300)	(0.600)
Corporate Director Place	Economy & Regeneration	Ceasing the Wiltshire Towns Funding Programme	(1.000)	-	-	(1.000)
Corporate Director Place	Planning	Indexation increase to nationally set planning application fees from 1st April 2025	(0.102)	(0.104)	-	(0.206)
Corporate Director Place	Planning	Increase in the monitoring fees charge for new S106 agreements secured as part of the planning application process	(0.060)	-	-	(0.060)

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Corporate Directorate	•		2025/26 £m	2026/27 £m	2027/28 £m	TOTAL £m
Corporate Director Place	Planning	Increased fee income agreed with developers when negotiating Planning Performance Agreements		(0.050)	-	(0.100)
Corporate Director Place	Environment	Reduce funding to World Heritage Partnership	(0.010)	-	-	(0.010)
Corporate Director Place	Environment	Review of current waste contracts to achieve efficiency savings	-	(0.100)	-	(0.100)
Corporate Director Place	Environment	Extended Producer Responsibility (EPR) income.	(0.200)	-	-	(0.200)
Corporate Director Place	rector Place Environment Increase recycling at Household Recycling Centres through waste sorting		(0.090)	-	-	(0.090)
Corporate Director Place	Environment	Apply charge for Household Recycling Centre visits by non-Wiltshire residents.	-	(0.120)	-	(0.120)
Corporate Director Place	Environment	Garden waste collection fee increase	(0.090)	(0.040)	-	(0.130)
Corporate Director Place	Environment	Review of HRC's service delivery	-	-	(0.143)	(0.143)
Corporate Director Place	Environment	Remove extended summer opening hours at Household Recycling Centres	-	-	(0.189)	(0.189)
Corporate Director Place	Environment	HRC Disposal Costs - pass-thru payments	-	(0.150)	-	(0.150)
Corporate Director Place	Environment	New Central Depot contract saving	-	-	(0.050)	(0.050)
Corporate Director Place	Environment	Removal of previously requested staffing pressure	(0.048)	-	-	(0.048)
Corporate Director Place	Leisure Culture & Communities	Community Lottery	-	(0.072)	(0.144)	(0.216)

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Corporate	Service	Saving Proposal Description	2025/26	2026/27	2027/28	TOTAL
Directorate			£m	£m	£m	£m
Corporate Director Place	Leisure Culture & Communities	Social Value Contractor Contributions	-	(0.050)	(0.075)	(0.125)
Corporate Director Place	Leisure Culture & Communities	Leisure Fees and Charges increases	(0.145)	ı	-	(0.145)
Corporate Director Place	Leisure Culture & Communities	Leisure Operations Income growth.	(0.507)	1	-	(0.507)
Chief Executive Directorates	Legal & Governance	Customer Services re-design	(0.100)	1	-	(0.100)
Chief Executive Directorates	Legal & Governance	Customer Services removal of vacant posts and staff savings	(0.160)	1	-	(0.160)
Chief Executive Directorates	Legal & Governance	Introduce full cost recovery for elections	(0.100)	1	-	(0.100)
Chief Executive Directorates	Legal & Governance	Legal & Democratic staff savings	(0.088)	-	-	(880.0)
Chief Executive Directorates	Legal & Governance	Staff Savings	(0.053)	-	-	(0.053)
Chief Executive Directorates	Legal & Governance	Reduce Legal Agency Spend	(0.040)	-	-	(0.040)
Chief Executive Directorates	Legal & Governance	Registration Service re-design	(0.100)	1	-	(0.100)
Chief Executive Directorates	Legal & Governance	Staff Savings	(0.039)	1	-	(0.039)
Chief Executive Directorates	Legal & Governance	Staff Savings	(0.039)	1	-	(0.039)
Chief Executive Directorates	Legal & Governance	Staff Savings	(0.090)	-	-	(0.090)
Chief Executive Directorates	Corporate Directors & Members	Place Directorate management savings	(0.130)	-	-	(0.130)

Corporate	Service	Saving Proposal Description	2025/26	2026/27	2027/28	TOTAL
Directorate			£m	£m	£m	£m
Corporate	Corporate Costs	Triennial valuation, reduction in existing employers contribution rate proposed to actuary: 2023/24 reduce by 1%, 2024/25 reduce by 2%, 2025/26 reduce by 1%	1.400		-	1.400
Corporate	Corporate Costs	Reduce Corporate Legal Budget	(0.100)	-	-	(0.100)
Corporate	Corporate Costs	Management and staff vacancy and efficiency reviews	(0.500)	(1.000)	-	(1.500)
Savings Total			(15.365)	(8.144)	(5.826)	(29.335)

### ANNEX 8 - GENERAL FUND RESERVE - RISK ASSESSED BALANCE

Key Financial Risks (Weighted Impact)

		ASSESSED FOR 202		25/26
Risk	Quantification	Potential Magnitude £m	Likelihood %	Weighted Magnitude £m
Non Delivery of Savings	Level of 2025/26 savings built into the budget - potential for an element of non delivery during the year based on previous years delivery rates	15.400	20%	3.080
Drop in demand for key income	Current levels to meet estimated income levels fluctuate beyond expected	50,000	400/	F 000
streams for services	market conditions & customer behavioural trends	50.000	10%	5.000
Insurance Claim	Claims over and above the self insured level that are also in excess of the insurance reserve held to cover off claims. Specific reference to Emliostha claims	20.000	5%	1.000
A number of factors may impact upon price inflation for commissioned care costs. One of the most significant being insufficient supply of workforce resulting in wage inflation and therefore higher costs of services. The lack of capacity in some sectors of the care market, as well as changing behaviour and need as a result of the pandemic, creates challenges around market shaping, market growth, and ultimately competitive commissioning rates. Based upon gross commissioned care expenditure of circa £194m per annum, a price inflation of 10% (above budgeted assumptions) driven by lack of capacity would equate to a cost pressure of £19m.		18.000	20%	3.600
Risk of adverse weather conditions	Extreme weather instances are increasing, coupled with reduced budgets	15.000	15%	2.250
Impact of key Adult Social Care large homecare contractor and/or care home going into administration / liquidation	Would require a new provider to carry out the service	20.000	10%	2.000
Realisation of future 'Accountable Body' liabilities	Financial exposure on funding being directed through projects where the Council acts as the Accountable body and the residual liabilities from the unwinding of SWLEP	30.000	1.0%	0.300
Collection Fund Volatility	Volatility in Collection Fund on collection rates, bad debts - assume 1% of total Collection Fund collectable for Wiltshire Council	430.000	1.0%	4.300
Collection Fund Deficits	Collection Fund deficits are funded the year following in which they arise, and occur where base assumptions are incorrect. Deficits are more likely to occur where economic conditions are worse than forecast - assume 2% of total Collection Fund with a 20% likelihood	8.600	20%	1.720
Children's Social Care increased demand for services above that built into the MTFS	Increased pressured on child in care placements, this is also a national concern & heightened given the recent high profile cases in relation to social care. Wiltshire placements have increased significantly in the last two years, there is a risk this trajectory could continue beyond preventative measures. A 10% increase in the gross expenditure of Children Social Care would be circa £9m. This is the equivalent of 16 high-cost agency residential placements.	9.000	25%	2.250
Adult Social Care reduction in the level of income received.	The move to gross payments to care providers, client debt recovery has/is become the responsibility of the Council, may increase the council's risk of irrecoverable debt.	12.000	25%	3.000
Universal Credit reducing the level of housing subsidy reclaimable from DWP as well as increasing demand for services & cost through Local Council Tax Support	The level of Universal Credit claimants has not reduced to pre-pandemic levels. This results in potential for increased overpayment recoveries from DWP as a result of the introduction of Universal Credit, and an increased demand for services and reduced level of Council Tax receipts.	10.000	5%	0.500
Potential non-delivery of capital receipts to fund the capital programme and Transformation activity	Subject to property market and asset rationalisation programme / devolution	10.000	5%	0.500
Investment Loss	Based on an assessment of risk within the Council's General Fund Treasury  Cash Investment Portfolio and level of default history in the sector.	200.000	0.5%	1.000
Adult Social Care increased demand for services above that built into the MTFS	Increased demand / demographic - with increasing demand for services nationally, and an ageing population being an acute pressure in Wiltshire, this could be higher.	5.000	15%	0.750
2025/26 national pay deal to be negotiated with the Unions	The pay deal negotations for 2025/26 will need to take place but this risk is based on being 1% of pay over & above budgeted assumption of 3.5% in 2025/26, given the level of inflation uncertainty & national picture in respect of ongoing pay deal negotations.		25%	0.380
Impact of changes to employers NI and inability to hold inflation on contract prices to that budgeted	Based on an increase of the value of contractual inflation of £13.3m included as a pressure in the budget.	13.303	15%	2.000
Loss of VAT Partial Exemption	Total impact of losing exemption.	3.800	10%	0.380
Abortive Costs on Capital Programme	Approved Capital Programme £253m - assumed 2% abortive costs being mainly fees on schemes that prove not to be viable.	5.060	5%	0.250
Planning Appeals	Estimated cost to the Council of successful planning appeals, no longer mitigated through other reserves.	1.500	25%	0.380
Total				34.640

**Annex 9 – Capital Programme 2025/26 to 2031/32** 

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
	£m	£m	£m	£m
Adult Services				
Disabled Facilities Grants	6.883	3.472	3.000	6.000
Adult Services Total	6.883	3.472	3.000	6.000
Education & Skills				
Access and Inclusion	0.100	0.100	0.100	0.200
Basic Need	10.604	8.300	6.455	3.950
Devolved Formula Capital	0.500	0.500	0.500	1.000
Schools Maintenance & Modernisation	8.105	10.305	8.355	4.050
Early Years & Childcare	0.877	0.000	0.000	0.000
Early Years Buildings	0.460	0.210	0.000	0.000
Silverwood Special School	4.430	0.747	0.000	0.000
SEND High Needs	7.906	2.000	0.000	0.000
High Needs Provision Capital Allowance	16.266	0.000	0.000	0.000
Education & Skills Total	49.248	22.162	15.410	9.200
Families & Children's Service				
Childrens Homes Phase 1 (DfE)	0.116	0.000	0.000	0.000
Families & Children's Accomodation	4.932	0.000	0.000	0.000
Canon's House	3.150	0.275	0.055	0.000
Families & Children's Total	8.198	0.275	0.055	0.000
Corporate Director - People TOTAL	64.329	25.909	18.465	15.200

**Annex 9 – Capital Programme 2025/26 to 2031/32** 

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
	£m	£m	£m	£m
Finance				
North Wiltshire Schools PFI Playing Fields	0.300	0.000	0.000	0.000
Evolve Project	1.187	0.000	0.000	0.000
Finance Total	1.487	0.000	0.000	0.000
Assets				
Capital Receipt Enhancement	0.286	0.000	0.000	0.000
Depot & Office Strategy	4.044	0.000	0.000	0.000
Facilities Management Operational Estate	6.017	4.540	4.360	9.632
Gypsies and Travellers Projects	1.250	0.000	0.000	0.000
Health and Wellbeing Centres - Live Schemes	0.143	0.387	0.000	0.000
Non-Commercial Property Purchases	0.000	0.019	0.000	0.000
Property Carbon Reduction Programme	2.750	0.000	0.000	0.000
Park & Ride Solar Panel Canopies	2.467	0.000	0.000	0.000
Facilities Management Investment Estate	0.175	0.250	0.250	0.500
Social Care Infrastructure & Strategy	0.634	0.000	0.000	0.000
Salisbury Resource Centre	0.000	0.825	0.000	0.000
South Chippenham	0.150	0.073	0.000	0.000
Housing Acquisitions	3.068	26.172	0.000	0.000
Assets Total	20.984	32.266	4.610	10.132
Capital Loans				
Stone Circle Housing Company Loan	11.519	0.119	0.140	0.472
Stone Circle Development Company Loan	5.000	4.000	0.000	0.000
Capital Loans Total	16.519	4.119	0.140	0.472
Information Services				
ICT Applications	2.181	1.550	1.629	0.000
ICT Business as Usual	0.782	0.723	0.000	0.000
ICT Other Infrastructure	0.545	0.201	0.598	0.000
ICT Get Well	0.725	1.200	0.988	0.000
ICT Stay Well	7.083	6.431	6.117	15.763
Information Services Total	11.316	10.105	9.332	15.763
Corporate Director - Resources TOTAL	50.306	46.490	14.082	26.367
Corporate Director Resources FOTAL	30.300	70.730	17.002	20.507

Annex 9 - Capital Programme 2025/26 to 2031/32

	Budget	Budget	2027/28 Budget	Years Budgets
	£m	£m	£m	£m
Highways & Transport				
Churchyards & Cemeteries	0.028	0.000	0.000	0.000
Fleet Vehicles	3.683	1.705	2.526	7.389
Integrated Transport	2.431	1.781	1.781	3.562
Local Highways and Footpath Improvement Groups	1.800	0.800	0.800	1.600
Structural Maintenance & Bridges	16.274	16.139	16.139	32.278
Drainage Improvements	0.315	0.000	0.000	0.000
Major Road Network M4 Junction 17	1.453	12.355	12.085	0.000
A338 Salisbury Junction Improvements MRN	1.746	0.000	0.000	0.000
A350 Chippenham Bypass (Ph 4&5) MRN	13.944	13.430	0.000	0.000
A3250 Melksham Bypass LLM - Full Scheme	3.222	6.294	6.446	219.874
Safer Roads Fund - A3102	4.067	0.000	0.000	0.000
Highways Investment Plan Tranche 2	10.455	0.000	0.000	0.000
Lyneham Banks	0.883	0.000	0.000	0.000
Central Area Depot & Strategy	3.000	12.000	15.000	1.770
Short Term Depot Provision	4.927	0.000	0.000	0.000
Highways & Transport Total	68.228	64.504	54.777	266.473
Economy & Regeneration				
Chippenham Station HUB	0.109	0.000	0.000	0.000
Corsham Mansion House	0.047	0.000	0.000	0.000
River Park	0.022	0.022	0.000	0.000
Porton Science Park	0.050	0.827	0.000	0.000
Salisbury Future High Streets	1.610	0.000	0.000	0.000
Trowbridge Future High Streets	0.230	0.010	0.000	0.000
UK Shared Prosperity Fund Projects	1.000	0.000	0.000	0.000
Carbon Reduction Projects	0.009	0.009	0.000	0.000
Wiltshire Ultrafast Broadband	1.011	0.000	0.000	0.000
Wiltshire Online	0.097	0.000	0.000	0.000
Economy & Regeneration Total	4.185	0.868	0.000	0.000
Environment				
Waste Projects	1.631	5.675	0.439	0.878
Environmental Projects	6.508	0.000	0.000	0.000
Environment Total	8.139	5.675	0.439	0.878
	0.133	3.073	0.433	0.070
Leisure Culture & Communities	0.400	0.400	0.400	
Area Boards Grants	0.400	0.400	0.400	0.800
Fitness Equipment for Leisure Centres	0.685	0.485	0.262	0.000
Libraries - Self Service	0.236	0.110	0.000	0.000
Trowbridge Leisure Centre	14.044	8.593	6.167	0.000
Leisure Requirements	1.663	0.317	0.000	0.000
History Centre Reception and Performing Arts Library	0.070	0.000	0.000	0.000
Leisure Culture & Communities Total	17.098	9.905	6.829	0.800
Corporate Director - Place TOTAL	97.650	80.952	62.045	268.151
	2025/26	2026/27	2027/28	Future
Scheme Name	Budget	Budget	Budget	Years
	Daaget	Dauget	Daaget	Budgets
	£m	£m	£m	£m
Housing Revenue Account				
Council House Build Programme (Phase 2)	0.068	0.000	0.000	0.000
Council House Build Programme (Phase 3)	25.128	42.854	24.189	38.072
Refurbishment of Council Stock	15.373	14.832	14.752	49.506
Highways Road Adoptions	0.540	0.500	0.500	2.596
	41.109	58.186	39.441	90.174



#### Appendix 2 – Capital Strategy 2025/26

- 1. This report presents the Capital Strategy for 2025/26 which sets out the proposed Capital Programme for 2025/26 with future years projected to 2031/32.
- 2. The Capital Strategy is an annual requirement that must be approved by Full Council.
- 3. The purpose of the Capital Strategy is to clearly set out the priorities and framework within which Wiltshire Council determines its resourcing priorities for capital investment, decides the level of borrowing, the affordability of the borrowing and sets the level of the risk appetite.

#### **BACKGROUND**

- 4. The Prudential Code for Capital Finance in Local Authorities (2017) introduced a new requirement for Local Authorities to prepare an annual Capital Strategy to be authorised by Full Council.
- 5. The purpose of the Capital Strategy is to clearly set out the priorities and framework within which Wiltshire Council determines its resourcing priorities for capital investment, decides the level of borrowing, the affordability of the borrowing and sets the level of the risk appetite.
- 6. The Prudential Code sets out that the Capital Strategy is intended to give a high level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services along with an overview of how associated risk is managed and the implications for future sustainability.
- 7. The Capital Strategy does not duplicate more detailed policies, procedures or plans; it is intended to sit above and reference these to allow those seeking more detail to know where to find it.
- 8. Capital Expenditure is defined within the Chartered Institute of Public Finance and Accountancy's (CIPFA) Accounting Code of Practice as; Expenditure that results in the acquisition, construction, or the enhancement of non-current assets (tangible or intangible) in accordance with proper practices. All other expenditure must be accounted for as revenue expenditure unless specifically directed by the Secretary of State.

#### CAPITAL EXPENDITURE

### **Capital Programme**

9. The Capital Programme is approved by Full Council. The proposed Capital Programme 2025/26 to 2031/32 is attached in Appendix 1, annex 9, and totals £998.856m. A summary position is set out in the tables below for both the capital spend and how it is planned to be financed.

10. The Capital Programme sets out the capital projects that the council plans to invest in over the next 7 years from 2025/26 to 2031/32; the amount of budget per project per year and the indicative sources of funding.

Service	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Corporate Director - People	64.329	25.909	18.465	15.200	123.903
Corporate Director - Resources	50.307	46.490	14.083	26.366	137.246
Corporate Director - Place	97.650	80.952	62.046	268.150	508.798
Total General Fund	212.286	153.351	94.594	309.716	769.947
Housing Revenue Account	41.109	58.186	39.441	90.173	228.909
Total Capital Programme	253.395	211.537	134.035	399.889	998.856

Funding	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Grants	78.273	61.117	48.856	239.424	427.670
Other Contributions	0.627	0.565	-	32.090	33.282
S106 Contributions	6.138	4.400	0.100	-	10.638
CIL Contributions	22.223	6.345	-	-	28.568
HRA	41.108	58.186	39.441	90.173	228.908
Capital Receipts	0.481	1.075	0.250	0.500	2.306
Stone Circle Loans	16.519	4.119	0.141	0.472	21.251
Revenue Contribution to Capital	9.280	0.597	-	-	9.877
Borrowing	78.746	75.133	45.247	37.230	236.356
Total Funding	253.395	211.537	134.035	399.889	998.856

- 11. The Capital Programme has been reviewed by the Capital Investment Programme Board. This officer governance process provides oversight across the programme and alignment with the Business Plan priorities. This governance also provides additional challenge to ensure all figures are validated and profiled realistically, in consultation with Capital Project leads where necessary, as the council has seen over-confidence with the deliverability of the scale of the programme that has been set previously in any given year. Profiling of the programme is critical not only to ensure deliverability but also due to the funding assumptions for those that impact revenue are realistic.
- 12. The revenue impact of financing capital investments are twofold; external interest payable and Minimum Revenue Provision (MRP). For the proposed capital programme 2025/26 to 2031/32 these have been factored into the 2025/26 revenue budget setting process and MTFS.
- 13. In setting the Capital Programme, the council will consider projects that can generate new or additional future on-going income revenues to replace reducing grant funding and enable services that are required by the community to be provided. Opportunities will also be explored to develop new ways of relieving future pressures. These projects will meet wider council priorities for example support economic activity, development or regeneration so will not be purely for yield.

14. The council will look to maximise opportunities to secure external funds and work with partners, both private and other government agencies, to increase the overall level of investment within Wiltshire to support priorities and economic development.

### People (£123.903m in the period 2024/25 to 2031/32)

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
	£m	£m	£m	£m
Adult Services				
Disabled Facilities Grants	6.883	3.472	3.000	6.000
Adult Services Total	6.883	3.472	3.000	6.000
Education & Skills				
Access and Inclusion	0.100	0.100	0.100	0.200
Basic Need	10.604	8.300	6.455	3.950
Devolved Formula Capital	0.500	0.500	0.500	1.000
Schools Maintenance & Modernisation	8.105	10.305	8.355	4.050
Early Years & Childcare	0.877	0.000	0.000	0.000
Early Years Buildings	0.460	0.210	0.000	0.000
Silverwood Special School	4.430	0.747	0.000	0.000
SEND High Needs	7.906	2.000	0.000	0.000
High Needs Provision Capital Allowance	16.266	0.000	0.000	0.000
Education & Skills Total	49.248	22.162	15.410	9.200
Families & Children's Service				
Childrens Homes Phase 1 (DfE)	0.116	0.000	0.000	0.000
Families & Children's Accomodation	4.932	0.000	0.000	0.000
Canon's House	3.150	0.275	0.055	0.000
Families & Children's Total	8.198	0.275	0.055	0.000
Corporate Director - People TOTAL	64.329	25.909	18.465	15.200

- 15. The Disabled Facility programme is funded by government grant and is forecast to be £19.355m across this capital programme period. This programme enables vulnerable individuals to remain in their homes through providing means tested adaptations.
- 16. We want to give the children of Wiltshire the best start in life as it is a fundamental part of improving their long-term life chances and affords them the best opportunity to live long, full and healthy lives as well as supporting the Business Plan priority principle of Empowering People. Wiltshire invests in Early Years and Schools to ensure places are available, offering choice and inclusivity and ensuring buildings are in a good condition and provide the right environment for learning and to keep children safe.
- 17. Included within the programme are significant schemes that cover the planned maintenance of Wiltshire schools from roof replacements to heating systems, that help support the council's commitment to carbon neutrality. Other schemes provide for expansions and new schools as well as ensuring facilities are accessible for pupils with additional needs. Schools Basic Need ensures that there are enough school places for children in their local area.

- 18. The Budget Report 2025/26 Appendix 3 provides the full detail of the projects included under the Schools Capital programme.
- 19. In recognition of rising national need for specialist places, the Department for Education (DfE) have provided annual High Need capital grants of varying amounts since 2018/19 to facilitate creation and expansion of Special School and Resource Base provision. These grants are included in the programme as High Needs Provision Capital Allowance. The budget for 2025/26 includes amounts from previous year's allocations that are committed against projects to increase specialist places in mainstream schools through the development and expansion of resource base provision and projects to increase special school provision. The budget also includes the additional High Needs Provision Capital Allowance of £5.7m allocated to the council under the Safety Valve programme which will deliver 120 additional special school places in the south of the county. No further allocations have yet been announced for 2025/26.
- 20. The SEND High Needs budget was approved by Cabinet in December 2023 in lieu of any further capital grants that the DfE may announce over the MTFS period. In conjunction with the high needs provision capital allowance, this funding supports the proposals in the draft Safety Valve plan and delivery of the plan is dependent on the creation of additional places included in the proposal.
- 21. Capital investment of £4.932m is set aside in 2025/26 for providing housing for care experienced and asylum seeking young people and children's residential homes for children and young people with complex needs in Wiltshire enabling the council to provide accommodation and commission providers at reduced rates. This provision will expand the existing marketplace for supported accommodation in Wiltshire, which is limited and support the continued development of inclusive housing, close to transport links, education and workplace opportunities in Wiltshire for care experienced young people and unaccompanied young people seeking asylum.

### Resources (£137.246m in the period 2025/26 to 2031/32)

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
	£m	£m	£m	£m
Finance				
North Wiltshire Schools PFI Playing Fields	0.300	0.000	0.000	0.000
Evolve Project	1.187	0.000	0.000	0.000
Finance Total	1.487	0.000	0.000	0.000
Assets				
Capital Receipt Enhancement	0.286	0.000	0.000	0.000
Depot & Office Strategy	4.044	0.000	0.000	0.000
Facilities Management Operational Estate	6.017	4.540	4.360	9.632
Gypsies and Travellers Projects	1.250	0.000	0.000	0.000
Health and Wellbeing Centres - Live Schemes	0.143	0.387	0.000	0.000
Non-Commercial Property Purchases	0.000	0.019	0.000	0.000
Property Carbon Reduction Programme	2.750	0.000	0.000	0.000
Park & Ride Solar Panel Canopies	2.467	0.000	0.000	0.000
Facilities Management Investment Estate	0.175	0.250	0.250	0.500
Social Care Infrastructure & Strategy	0.634	0.000	0.000	0.000
Salisbury Resource Centre	0.000	0.825	0.000	0.000
South Chippenham	0.150	0.073	0.000	0.000
Housing Acquisitions	3.068	26.172	0.000	0.000
Assets Total	20.984	32.266	4.610	10.132
Capital Loans				
Stone Circle Housing Company Loan	11.519	0.119	0.140	0.472
Stone Circle Development Company Loan	5.000	4.000	0.000	0.000
Capital Loans Total	16.519	4.119	0.140	0.472
Information Services				
ICT Applications	2.181	1.550	1.629	0.000
ICT Business as Usual	0.782	0.723	0.000	0.000
ICT Other Infrastructure	0.545	0.201	0.598	0.000
ICT Get Well	0.725	1.200	0.988	0.000
ICT Stay Well	7.083	6.431	6.117	15.763
Information Services Total	11.316	10.105	9.332	15.763
Corporate Director - Resources TOTAL	50.306	46.490	14.082	26.367
Corporate Director - Resources TOTAL	50.306	40.490	14.062	20.307

- 22. The council's Asset Management Plans set out the approach to managing the council's land and property assets. The council has asset management policy frameworks which support the overall approach of managing assets by portfolio and include areas such as disposals and acquisitions, as well as active management of the council's operational, commercial, and rural estate. These assets support all 4 Business Plan priorities.
- 23. The council continues to focus on the most efficient use of its buildings, which includes sharing space. The council is moving to a market rent position for its tenants and has implemented a third party charging policy.
- 24. Wiltshire Council is on the path to meets its carbon neutral commitment and included within the programme are schemes and projects for the estate that will assist with this. These projects include lighting upgrades, PV installations, upgraded air handling units and installation of air source heat pumps.

- 25. £0.480 investment has been added to the programme to carry out essential interim maintenance to the Maltings Car Park, Salisbury under the terms of an underlease. Works will include brickwork, drainage, parapet and handrails (replacement/refurbishment) and protective coating to exposed brickwork.
- 26. £0.250m investment has been added to the capital programme to establish a dedicated maintenance budget for non-operational assets, providing greater transparency of maintenance for these assets and preserving the operational budget for its intended purposes.
- 27. An inflationary uplift of £0.206m has been added annually to the programme to the Facilities Maintenance Capital scheme budget. This covers capital maintenance, repair and replacement of building systems and infrastructure in council buildings, ensuring they remain compliant and operational. The budget has stayed static for several years. This inflationary increase will help prevent an effective real term decline in capital maintenance.
- 28. Investment of £5.630m is included to provide dedicated maintenance/upgrade funding to four strategic buildings that have a long-term future and will address critical infrastructure and deferred cosmetic improvements.
- 29. Stone Circle Housing and Development companies were established in 2019 to meet a range of Wiltshire's strategic housing needs and undertake residential development, predominantly on council owned land to ensure these needs are met while increasing the potential return to the council.
- 30. The aim of Stone Circle Housing Company is to meet a range of strategic housing needs facing the council that cannot easily be addressed by the council's current approaches. Accommodation to meet the needs of specific vulnerable households in a timely manner from the existing housing stock in Wiltshire is not a priority for the council's registered provider partners. The council procures accommodation for homeless households that is costly and the quality and cost could be improved by private rented sector accommodation provided by a local housing company.
- 31. Improving housing supply is critical for ensuring people can live and work locally and play an active part in their community. We want to ensure that residents have easy access to high quality and affordable housing that's close to their family, that's right for them and in beautiful places.
- 32. The total budget for these schemes across this capital programme period is £21.250m and will be financed by external borrowing which will be funded by returns from the Stone Circle companies.

### Place (£508.798m in the period 2025/26 to 2031/32)

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
	£m	£m	£m	£m
Highways & Transport				
Churchyards & Cemeteries	0.028	0.000	0.000	0.000
Fleet Vehicles	3.683	1.705	2.526	7.389
Integrated Transport	2.431	1.781	1.781	3.562
Local Highways and Footpath Improvement Groups	1.800	0.800	0.800	1.600
Structural Maintenance & Bridges	16.274	16.139	16.139	32.278
Drainage Improvements	0.315	0.000	0.000	0.000
Major Road Network M4 Junction 17	1.453	12.355	12.085	0.000
A338 Salisbury Junction Improvements MRN	1.746	0.000	0.000	0.000
A350 Chippenham Bypass (Ph 4&5) MRN	13.944	13.430	0.000	0.000
A3250 Melksham Bypass LLM - Full Scheme	3.222	6.294	6.446	219.874
Safer Roads Fund - A3102	4.067	0.000	0.000	0.000
Highways Investment Plan Tranche 2	10.455	0.000	0.000	0.000
Lyneham Banks	0.883	0.000	0.000	0.000
Central Area Depot & Strategy	3.000	12.000	15.000	1.770
Short Term Depot Provision	4.927	0.000	0.000	0.000
Highways & Transport Total	68.228	64.504	54.777	266.473
Economy & Regeneration				
Chippenham Station HUB	0.109	0.000	0.000	0.000
Corsham Mansion House	0.047	0.000	0.000	0.000
River Park	0.022	0.022	0.000	0.000
Porton Science Park	0.050	0.827	0.000	0.000
Salisbury Future High Streets	1.610	0.000	0.000	0.000
Trowbridge Future High Streets	0.230	0.010	0.000	0.000
UK Shared Prosperity Fund Projects	1.000	0.000	0.000	0.000
Carbon Reduction Projects	0.009	0.009	0.000	0.000
Wiltshire Ultrafast Broadband	1.011	0.000	0.000	0.000
Wiltshire Online	0.097	0.000	0.000	0.000
Economy & Regeneration Total	4.185	0.868	0.000	0.000
Environment				
Waste Projects	1.631	5.675	0.439	0.878
Environmental Projects	6.508	0.000	0.000	0.000
Environment Total	8.139	5.675	0.439	0.878
Leisure Culture & Communities				
Area Boards Grants	0.400	0.400	0.400	0.800
Fitness Equipment for Leisure Centres	0.400	0.485	0.400	0.000
Libraries - Self Service	0.003	0.403	0.000	0.000
Trowbridge Leisure Centre	14.044	8.593	6.167	0.000
Leisure Requirements	1.663	0.317	0.000	0.000
History Centre Reception and Performing Arts Library	0.070	0.000	0.000	0.000
Leisure Culture & Communities Total	17.098	9.905	6.829	0.800
Corporate Director - Place TOTAL	97.650	80.952	62.045	268.151
Ourporate Director - Flace TOTAL	37.030	00.332	02.043	200.131

- 33. Wiltshire invests in its infrastructure. This includes the resurfacing of roads, reactive patching, surface dressing, drainage and pothole repairs and Real Time Passenger Information. This is funded by a combination of external grants from central government, borrowing and developer contributions.
- 34. £0.505m investment is required for a 5 year plant and equipment replacement plan to support Winter and Resilience, Local Highways and Fleet Services. The plan will

- provide snow ploughs, blowers and emergency equipment (welfare units/lighting). Where feasible carbon neutral solutions will be sought.
- 35. £0.800m additional investment in 2025/26 that is to be funded from borrowing is required to complete the Hindon Stagger depot. The Hindon Stagger project is the last of 7 projects that form the Depot & Office Strategy Phase 1 capital programme of works. The overall programme commenced in 2018/19 and had a total budget envelope of £11.310m to deliver all projects. Cost increases over time have resulted in an increase in the total programme forecast being circa £0.800m over the budget available. The Hindon Stagger project has faced numerous challenges including its location requiring a significant volume of additional survey work and associated mitigations to secure approval for construction and inflationary cost pressures.
- 36. A total of £0.113m has been added to the Environmental Projects capital programme in 2025/26 for two air quality equipment schemes to support the council's statutory responsibilities and provide data to inform the development and planning process, secure s106 contributions and support decision making around health impacts. £0.035m for the purchase of two new real time sensor-based air quality monitors for Marlborough and Devizes and £0.078m for the purchase of a new air quality monitoring station street box for monitoring nitrogen dioxide and fine particulates in Calne. These will be funded through contributions from revenue. Funds are also held in this budget line for the grant funded Nutrient Neutrality work committed to in 2024/25.
- 37. Waste Projects budget for 2026/27 includes grant funding of £4.990m received from Government under New Burdens funding in preparation for the collection of food waste in 2027/28.
- 38. Work to deliver a new leisure centre for Trowbridge continues at pace. The planning application was submitted at the beginning of September with a decision originally expected in January 2025. Excellent progress has meant that the project actually received planning consent at Strategic Planning Committee on 11 December 2024. Meanwhile detailed design development is progressing well with contract award scheduled in early 2025
- 39. The council secured Department for Levelling Up, Housing and Communities (DLUHC) grant funding in 2022/23 for Future High Streets and combined with a local contribution will deliver projects in Trowbridge and Salisbury.
- 40. Salisbury Future High Streets budget of £1.610m for this period will focus on the Station Forecourt and Fisherton Street in Salisbury. This will enhance the public realm and improve accessibility to make it easier, safer, and more convenient to travel into the city centre.

### Housing Revenue Account (£228.909m in the period 2025/26 to 2031/32)

Scheme Name	2025/26 Budget	2026/27 Budget	2027/28 Budget	Future Years Budgets
Housing Revenue Account	£m	£m	£m	£m
Council House Build Programme (Phase 2)	0.068	0.000	0.000	0.000
Council House Build Programme (Phase 3)	25.128	42.854		
Refurbishment of Council Stock	15.373		14.752	49.506
Highways Road Adoptions	0.540	0.500		
Housing Revenue Account TOTAL	41.109	58.186	39.441	90.174

- 41. The Housing Revenue Account is overseen by the Wiltshire Housing Board. The Board is responsible for setting the vision and strategic direction of the service. It is appointed to by the Service and the term of office is linked to the local government cycle. The Board has to be reappointed every 4 years at a minimum and is a 9-person board comprising 3 independent members, 3 resident members and 3 councillor members. Officers report regularly to the board to provide assurance on the adequacy and effectiveness of running the service. There is a separate HRA budget report for 2025/26 financial year that provides greater detail of the HRA capital programme.
- 42. The Council House Build Programme is aligned to the remodelled Housing Revenue Account (HRA) business plan 2021-2051 that was approved by Cabinet in January 2021. The 30-year business plan aims to deliver a substantial increase in the amount of money available to be invested in capital works on existing dwellings and to deliver new housing to replace properties that have been sold under the Government's Right to Buy scheme and to address housing need. This Business Plan is reported, approved, and monitored through the Housing Board. The 2025/26 revised plan shows significantly increased costs reflecting the significant changes in global economics and supply chains, substantial cost inflation and borrowing costs and reports on the financial implications of these changes. As a result, the debt levels have risen significantly, and the build programme timing has been extended. Further modelling is therefore planned with an aim of re-evaluating options and reducing risk. This will be brought to Cabinet during 2025/26 for approval.
- 43. The total budget for the Council House Build programme will be funded by a mixture of grants & contributions, HRA capital receipts or by the HRA, either directly or via external borrowing (funded by the HRA). The aim of the Business Plan is to deliver carbon zero new builds and investment in all existing stock to achieve energy performance rating B.
- 44. The Refurbishment of Council Stock programme is for the cyclical repairs and maintenance on the council's housing stock e.g. bathrooms, kitchens, roofs boilers etc. This also includes the work to improve the Energy Efficiency of the Council's Housing Stock.

#### Capital Financing

45. The Capital Programme financing can be summarised as follows:

Funding	2025/26 Budget £m	2026/27 Budget £m	2027/28 Budget £m	Future Years Budgets £m	Total Budget £m
Grants	78.273	61.117	48.856	239.424	427.670
Other Contributions	0.627	0.565	-	32.090	33.282
S106 Contributions	6.138	4.400	0.100	-	10.638
CIL Contributions	22.223	6.345	-	-	28.568
HRA	41.108	58.186	39.441	90.173	228.908
Capital Receipts	0.481	1.075	0.250	0.500	2.306
Stone Circle Loans	16.519	4.119	0.141	0.472	21.251
Revenue Contribution to Capital	9.280	0.597	-	-	9.877
Borrowing	78.746	75.133	45.247	37.230	236.356
Total Funding	253.395	211.537	134.035	399.889	998.856

- 46. The council seeks to utilise a wide range of funding to support its Capital Programme, maximising external funding opportunities, such as grants and contributions, and limiting internal sources, such as revenue funding. Capital funding sources are described below.
- 47. **Grants & Contributions -** Grant funding is one of the largest sources of financing for the Capital Programme. The majority of grants are awarded by Central Government departments, but some are received from other external bodies. Grants can be specific to a scheme, have conditions attached (such as time and criteria restrictions), or are for general use. S106 deposits account for the majority of capital contribution funding; these deposits are paid by developers and are ringfenced for particular projects as defined in the individual S106 agreements. Community Infrastructure Levy (CIL) can be used to fund capital expenditure in line with the council's CIL policy.
- 48. **HRA** Capital expenditure for the Housing Revenue Account (HRA) is ringfenced from general fund capital expenditure and is financed by a combination of HRA borrowing and use of the ring-fenced HRA major repairs reserve.
- 49. **Capital Receipts -** The income received over the value of £0.010m from the disposal of Fixed Assets or the repayment of loans for capital purposes is defined as a capital receipt. They can normally only be used to fund capital expenditure or repay debt. Some capital receipts have additional restrictions on their use. The council seeks to obtain the highest possible receipt achievable from each disposal after considering wider community or service benefits. HRA receipts generated from the disposal of HRA assets are ringfenced to fund HRA projects.
- 50. **Borrowing (funded by revenue savings in service) –** This is where a scheme is in the Capital Programme to be funded by borrowing but it is anticipated that revenue savings or income generation arising from the capital investment will be utilised to fund the costs of borrowing.
- 51. **Borrowing -** The council can determine the level of its borrowing for capital financing purposes, based upon its own views regarding the affordability, prudence and sustainability of that borrowing, in line with the CIPFA Prudential Code for Capital Finance and within the Prudential Indicators set within the Treasury Management

- Strategy Statement. Borrowing levels for the Capital Programme are therefore constrained by the affordability assessment and by the availability of the revenue budget to meet the cost of this borrowing which is built into the council's Medium-Term Financial Strategy (MTFS).
- 52. **Revenue Funding** The council can use revenue resources to fund capital projects on a direct basis. However, given the pressures on the revenue budget of the council, there are currently limited plans to finance a small amount of the current capital programme by revenue funding currently set aside in a revenue reserve due to the value for money assessment of funding those small schemes from borrowing. It is unlikely that the council will choose to undertake this method of funding in the future if other sources are available unless borrowing is not deemed to be appropriate.

### Capitalisation

- 53. The council has a set of Accounting Policies that are approved annually by the Audit and Governance Committee that set out the council's approach to capitalisation and are based upon guidance issued by the Chartered Institute of Public Finance and Accountancy (CIPFA) and take account of local circumstances.
- 54. The approved Accounting Policies are published within the Statement of Accounts and include policies on all the key accounting matters that affect the figures and disclosures in the statements.
- 55. Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment is capitalised on an accruals basis, provided that it is probable that the future economic benefits or service potential associated with the item will flow to the council and the cost of the item is directly attributable to an asset and can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits or service potential (i.e. repairs and maintenance) is charged as an expense to the revenue account when it is incurred.

#### **KNOWLEDGE AND SKILLS**

56. The Capital Strategy has been developed by Officers of the council, who have relevant knowledge and technical skills. In addition, external advice and management is employed by the council procuring and appointing suitably qualified advisors and managers to support the development, operation and design of the programmes.

#### Consultants

57. The council will use external consultancy services where there is a requirement to do so. A contract is in place for Treasury Management advice which includes advice on borrowing.

#### **Training**

58. In order to ensure that members and Statutory Officers have appropriate capacity and skills regarding their involvement in the investment decision making the following steps are required:

- Training given to Members in all aspects of the Statutory Guidance, the assessment of individual investments and risk.
- Technical training given to Statutory Officers and those officers negotiating commercial deals in the technical fields of investment evaluation and requirements of the statutory guidance and prudential code.
- Briefings to members of the relevant committees in advance of any investment decision making prior to a decision being brought forward to the committee covering all aspects of the assessment as well as the strategic fit.
- 59. The Corporate Governance arrangements around decisions on non-financial investments will follow the rigour of our normal committee arrangements. The relevant Cabinet Members will be fully briefed in terms of the full details of the assessment including external advisor reports. Scrutiny will review all such individual decisions in advance of a Cabinet decision.

#### **Financial Implications**

- 60. These have been examined and are implicit throughout the report.
- 61. The revenue implications (Minimum Revenue Provision and External Interest) of funding the capital programme have been estimated and have been included in the council's 2025/26 revenue budget setting report as well as in the Medium-Term Financial Strategy.
- 62. If the profiling of capital schemes funded by borrowing is incorrect there will be a direct impact on the council's revenue budget. It is therefore of vital importance that schemes are reviewed regularly.

### **Workforce Implications**

63. Staff who are working on specific schemes within the capital programmes will be funded from the capital programme for the duration of the programme of work and therefore will be funded temporarily. This means that there may be implications for those staff at the end of the programme of work. However, the council has in place robust policies and procedures to support this.

### Schools Capital Programme 2025/26 - 2030/31

#### **Purpose of Report**

1. To agree the Schools Capital Programme for 2025/26 – 2030/31. This paper addresses investment to improve the condition of maintained schools and expansion of mainstream schools. Investment in special school places and resource bases is not included in this paper.

#### Relevance to the Council's Business Plan

2. The Council has a statutory duty to provide sufficient school places to meet the demand arising across Wiltshire, whether from demographic or population change, strategic housing development growth or military moves. The Council also has responsibilities for the effective management and maintenance of the Councils schools' estate (community, foundation and voluntary controlled schools only). Schools need to be fit for purpose and safe for all site users.

### **Background**

- 3. The Council receives annual capital funding allocations from the Department for Education (DfE) for basic need (new places) and condition (school capital maintenance). Capital maintenance relates to urgent and essential structural works e.g. roofs, walling, windows, drainage etc in addition to plant (electrical and mechanical works (heating/lighting etc)). All other day to day maintenance works and low level cost works are the schools' responsibility funded from their delegated or devolved funds.
- 4. It should be noted that the council has not yet received confirmation of DfE maintenance funding for 2025/26 onwards. We are therefore assuming that funding for 2025/26 onwards will be consistent with this years' allocation.
- 5. The figures shown in Table 1 below, include the estimated DfE allocations and slippage from previous years on current schemes. Since 2020/21 the Council has been supplementing the DfE grant for school maintenance, with this increasing to £3m per annum for 2024/25 to 2027/28. This additional funding is essential to stem the decline of the school building stock and enable some of the historical backlog of works to be addressed.
- 6. Full Council in Feb 2020 also approved £0.100m a year over the next ten years to support the admission of pupils with disabilities to schools. This will fund ramps, handrails, accessible toilets and similar works to mainstream schools to support inclusion.

Table 1 - Capital Funding for Schools (£m)

Description	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Total
	£m	£m	£m	£m	£m	£m	£m
Access and Inclusion	0.100	0.100	0.100	0.100	0.100	0.000	0.500
Maintenance and Modernisation	8.105	10.255	8.460	5.050	2.000	2.000	35.870
Basic Need	10.604	8.350	6.350	0.550	0.400	0.000	26.254
TOTAL	18.809	18.705	14.910	5.700	2.500	2.000	62.624

7. The Council also secures wherever possible, S106 developer contributions and will seek Community Infrastructure Levy (CIL) planning obligations for essential school infrastructure in areas of new housing development which are usually project or school specific. These are only included in the figures above where projects using Section 106 or CIL allocations are already approved and underway.

#### Main Considerations for the Council

### Additional Pupil Places

- 8. Demand for school places is influenced by a number of factors including changes in the birth rate, migration (inward and outward), housing development, the economic situation, parental preference etc and in Wiltshire specifically, military moves have a significant impact.
- 9. Two projects to provide additional school places have completed during 2024/25 at Porton St Nicholas Primary School and St Peter's Primary CE Primary Academy in Salisbury. The significant expansion of Kingdown School is due to start on site early in 2025. The expansion of Abbeyfield School is awaiting planning consent and design work is commencing on the expansion of Sarum Academy. All of these projects have been approved by Cabinet in previous years. There are no new expansion projects requiring approval at this time.

#### Replacement of poor quality accommodation

- 10. The Strategic Assets and Facilities Management Service identified that the lower school block at Stonehenge school required complete replacement. The building was end of life, in very poor condition and beyond economical repair. Construction on the replacement block completed for September 2023. The old block has now been demolished and playing field created in its place.
- 11. The replacement of poor condition mobiles and prattens is included as an objective in the Council's Business Plan. Council capital funding to replace these old blocks

was secured in 2022/23. Projects to replace old mobiles with new permanent accommodation have already been completed at Holbrook Primary School and Studley Green Primary School. A project is also in construction at Grove Primary School to replace 4 mobile classrooms. This project is being combined with the creation of a new Resource Base with that element funded by the High Needs Capital Grant.

- 12. Design work is also underway for the next project at Frogwell Primary School where internal remodelling and refurbishment will enable the demolition of old mobiles and prattens. A feasibility study has also been completed for the replacement of 3 mobile classrooms at Hullavington Primary School. Approval is sought to proceed with the projects at Frogwell and Hullavington as shown in Table 2 below.
- 13. The Council has also notified several other schools that they are likely to be included in the mobile replacement programme but will need to await funding in subsequent years. Should any of these blocks need to be replaced with more urgency, approval is also sought to allow feasibility and design work to be approved under the delegated authority of the Director of Children's Services where these further projects are identified as high priority.

Table 2: New Mobile/Pratten replacement project/s requiring approval

School	Project	Current Status	Requiring allocation approval £m
Frogwell Primary School	Significant internal refurbishment and eventual demolition of old mobiles and prattens, with making good of those areas after demolition.	Feasibility completed	2.000
Hullavington	Replacement of 3 old mobiles with new classroom block.	Feasibility completed	1.600
Various	Commencement of design work only on other schemes identified as high priority.	Not started	0.250
		TOTAL	3.850

#### Maintenance

- 14. In addition to basic need (growth related) capital projects, there is a significant backlog of priority capital repair and maintenance schemes in those schools for which the Council remains responsible.
- 15. In February 2024, a significant programme of planned maintenance projects were approved to proceed by Cabinet, these are now largely complete. In addition to these planned maintenance works, a contingency was held to address emergency reactive works required during the year to keep schools safe and open. Over 50

- projects costing over £5k each have therefore also been completed since 1 April 2024.
- 16. The school condition backlog in 2024/25 stands at £21.8m, (down from £22.5m in the previous year). This reduction is partly as a result of increased investment but also as some maintained schools have converted to academy status. Condition surveys are updated on a 5-year rolling programme and each new survey identifies additional works as the school estate ages and the cost of works increases with inflation.
- 17. The new planned maintenance schemes recommended for inclusion in the 2025/26 programme of work total an estimated £3.4m. These priority schemes are shown in Table 3 below, approval is sought to proceed with these projects. A total of £1.6m will be held for emergency works and as contingency. However, a further list of provisional planned works will be brought forward to use any of this funding that remains.

Table 3: New school maintenance projects requiring approval

(Costs include direct fees and charges associated with work planned, including any necessary asbestos removal).

School	Type of Maintenance Works	Est Cost
		£
Amesbury Stonehenge	Drainage, hot and cold water distribution, fire alarm	184,600
Devizes Downlands	Roof	150,800
Bulford Kiwi	Lighting Upgrade	76,700
Horningsham	Roofs	154,800
Silverwood (Rowde)	Boilers	55,255
Silverwood (Trowbridge)	Roof	200,800
Staverton Primary	Roof	200,800
Sutton Veny Primary	Heating and roof	148,821
Minster Primary	Roof	17,696
Westbury Infants	Roofs	178,600
Matravers Secondary	Roof	150,000
Hilperton Primary	Roof	33,800
Broad Town Primary	Fire Alarm	30,800
Charter Primary	Lighting Upgrade, roof repairs	114,912
Frogwell Primary	Emergency lighting, rainwater goods	96,600
Kings Lodge Primary	Kitchen refurb	87,800
Monkton Park Primary	Glazing and toilet refurbs	73,612
St Paul's Primary	Flooring, drains and toilet refurbs	67,114
Colerne Primary	Cladding, windows	73,693
Cricklade St Sampson's Primary	Boiler, hot/cold water distribution	130,307
Crudwell Primary	Fire alarm	26,018
Kington St Michael Primary	Rainwater goods	15,992
Lacock Primary	Power wiring	8,300
Lyneham Primary	Roofs and ventilation	62,800
Minety Primary	Power wiring	13,500
Preshute Primary	Gas distribution	27,854
Ramsbury Primary	Roof	48,000
Sherston Primary	Heating, lighting, roof lights	226,600
Silverwood (Chippenham)	Boiler	85,800
Durrington CE VC Junior School	Windows and heating	196,913
Harnham Junior School	Flat roof	10,000
Mere Primary School	Roof and boiler	147,600
Salisbury Harnham Infants School	Rain water goods	38,613
Tidworth Clarendon Junior School	Oil tank	14,500
Various schools	Legionella, asbestos and statutory compliance works	250,000
Total Planned Works	·	3,400,000
Emergency works, contingency and pr	oject management	1,600,000
Total		5,000,000

<sup>18.</sup> If a decision is taken by a school to convert to Academy status, prior to commencement of any approved project, and before a contract is committed, then the work will be reviewed and where appropriate, removed from the list. When

schools convert to Academy status, building maintenance responsibility for those academy's transfers to the academy itself and the Council's capital funding allocation correspondingly reduces. That funding is transferred to the ESFA who funds academies direct.

#### Conclusion

19. The Council has a statutory duty to provide and maintain sufficient high-quality school places to meet the demand arising across Wiltshire, whether from demographic or population change, housing developments or military movements. The Council also has responsibilities for the effective management and maintenance of the Councils schools' estate (community, foundation and voluntary controlled schools only). Schools need to be fit for purpose and safe for all site users. The funding allocation to projects requested in this paper will enable the priority works to be progressed.

#### **Proposals**

- 20. It is recommended that Cabinet approve:
  - i. the funding allocations identified in Tables 2 and 3 to the named schemes subject to any necessary planning approvals.
  - ii. To delegate to the Director of Education and Skills to invite and evaluate tenders for the projects described in this report, and, to award the contract for the project (subject to approval of any necessary statutory proposals) and to authorise, in consultation with the Head of Estates and Development, in accordance with the relevant scheme of sub-delegation (under Part 3 Section D1 of Wiltshire Council's constitution), the acquisition of all land (and the completion of any legal documentation) reasonably required in order to facilitate the completion of any of the listed projects.

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE			<u>.</u>				
Environment							
Environment	Public Protection (Licensing)	Large casino premises licence (set by regulation):					
Environment	Public Protection (Licensing)	Maximum non-conversion application fee in respect of provisional statement premises	per application	£5,000.00	£5,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum non-conversion application fee in respect of other premises	per application	£10,000.00	£10,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum annual fee	per application	£10,000.00	£10,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application to vary licence	per application	£5,000.00	£5,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application to transfer a licence	per application	£2,150.00	£2,150.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for reinstatement of a licence	per application	£2,150.00	£2,150.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for provisional statement	per application	£10,000.00	£10,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Small casino premises licence (set by regulation):					
(C) (D) (D) (D) (D) (D) (D) (D) (D) (D) (D	Public Protection (Licensing)	Maximum non-conversion application fee in respect of provisional statement premises	per application	£3,000.00	£3,000.00	£0.00	0.0%
Phyironment	Public Protection (Licensing)	Maximum non-conversion application fee in respect of other premises	per application	£8,000.00	£8,000.00	£0.00	0.0%
Dvironment	Public Protection (Licensing)	Maximum annual fee	per application	£5,000.00	£5,000.00	£0.00	0.0%
<b>A</b> vironment	Public Protection (Licensing)	Maximum fee for application to vary licence	per application	£4,000.00	£4,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application to transfer a licence	per application	£1,800.00	£1,800.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for reinstatement of a licence	per application	£1,800.00	£1,800.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for provisional statement	per application	£8,000.00	£8,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Converted casino premises licence (set by regulation):					
Environment	Public Protection (Licensing)	Annual fee (first & subsequent)	per application	£2,000.00	£2,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application to vary licence	per application	£1,350.00	£1,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application to transfer a licence	per application	£1,350.00	£1,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for reinstatement of a licence	per application	£1,350.00	£1,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Maximum fee for application for provisional statement	per application	£1,350.00	£1,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Bingo premises licence (set by regulation):					
Environment	Public Protection (Licensing)	New - Application fee	per application	£2,115.00	£2,115.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for provisional statement	per application	£2,115.00	£2,115.00	£0.00	0.0%
Environment	Public Protection (Licensing)	New Application - where a provisional statement exists	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to vary licence	per application	£1,275.00	£1,275.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to transfer a licence	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for reinstatement of a licence	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual fee	per application	£870.00	£870.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Adult gaming centre premises licence (set by regulation):					
Environment	Public Protection (Licensing)	New - Application fee	per application	£1,520.00	£1,520.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for provisional statement	per application	£1,470.00	£1,470.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application where a provisional statement exists	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to vary licence	per application	£930.00	£930.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to transfer a licence	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for reinstatement of a licence	per application	£1,200.00	£1,200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual fee	per application	£690.00	£690.00	£0.00	0.0%
<u>En</u> vironment	Public Protection (Licensing)	Copy of Licence	per application	£25.00	£25.00	£0.00	0.0%
vironment	Public Protection (Licensing)	Betting premises (track) licence (set by regulation):					
nvironment	Public Protection (Licensing)	New - Application fee	per application	£2,500.00	£2,500.00	£0.00	0.0%
Phvironment	Public Protection (Licensing)	Application for provisional statement	per application	£2,500.00	£2,500.00	£0.00	0.0%
₩vironment	Public Protection (Licensing)	Application where a provisional statement exists	per application	£950.00	£950.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to vary licence	per application	£1,250.00	£1,250.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to transfer a licence	per application	£950.00	£950.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for reinstatement of a licence	per application	£950.00	£950.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual fee	per application	£1,000.00	£1,000.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Licence	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Family entertainment centre premises licence (set by regulation):					
Environment	Public Protection (Licensing)	New application fee	per application	£1,550.00	£1,550.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for provisional statement	per application	£1,550.00	£1,550.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application fee where a provisional statement exists	per application	£850.00	£850.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to vary licence	per application	£950.00	£950.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to transfer a licence	per application	£750.00	£750.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for reinstatement of a licence	per application	£750.00	£750.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual fee	per application	£730.00	£730.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Licence	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Betting premises (other) licence (set by regulation): Betting Shops					
Environment	Public Protection (Licensing)	New application fee	per application	£2,350.00	£2,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for provisional statement	per application	£2,350.00	£2,350.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application fee where a provisional statement exists	per application	£1,200.00	£1,200.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Application to vary licence	per application	£1,300.00	£1,300.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application to transfer a licence	per application	£975.00	£975.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Application for reinstatement of a licence	per application	£975.00	£975.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual fee	per application	£600.00	£600.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Licence	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Other Gambling Act fees (set by regulation):					
Environment	Public Protection (Licensing)	Fee to accompany a notification of change of circumstances under Section 186(1)	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Temporary use notice fee	per application	£310.00	£310.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Occasional Use Notice	per application	Free	Free	£0.00	
Environment	Public Protection (Licensing)	Notification of 2 or less gaming machines	per application	£50.00	£50.00	£0.00	0.0%
hvironment	Public Protection (Licensing)	Registration of non-commercial small society lotteries - Initial	per application	£40.00	£40.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Registration of non-commercial small society lotteries - Renewal	per application	£20.00	£20.00	£0.00	0.0%
<b>En</b> vironment	Public Protection (Licensing)	Licensed Premises Gaming Machine Permit (set by regulation)					
Environment	Public Protection (Licensing)	Grant	per application	£150.00	£150.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Existing operator Grant	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Variation	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Transfer	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Annual Fee	per application	£50.00	£50.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Licensed Premises Gaming Machine Permit (set by regulation)					
Environment	Public Protection (Licensing)	Change of name	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Permit	per application	£15.00	£15.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Licensed Premises Automatic Notification Process (set by regulation)					
Environment	Public Protection (Licensing)	On notification	per application	£50.00	£50.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Club Gaming Permits (set by regulation)					
Environment	Public Protection (Licensing)	Grant	per application	£200.00	£200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Grant (Club Premises Certificate holder)	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Existing operator Grant	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Variation	per application	£100.00	£100.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE	•						
Environment							
Environment	Public Protection (Licensing)	Renewal	per application	£200.00	£200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Renewal (Club Premises Certificate holder)	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Club Gaming Permits (set by regulation)					
Environment	Public Protection (Licensing)	Annual Fee	per application	£50.00	£50.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Permit	per application	£15.00	£15.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Club Machine Permits (set by regulation)					
Environment	Public Protection (Licensing)	Grant	per application	£200.00	£200.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Grant (Club Premises Certificate holder)	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Existing operator Grant	per application	£100.00	£100.00	£0.00	0.0%
Nivironment	Public Protection (Licensing)	Variation	per application	£100.00	£100.00	£0.00	0.0%
nvironment	Public Protection (Licensing)	Renewal	per application	£200.00	£200.00	£0.00	0.0%
Phvironment	Public Protection (Licensing)	Renewal (Club Premises Certificate holder)	per application	£100.00	£100.00	£0.00	0.0%
vironment	Public Protection (Licensing)	Annual Fee	per application	£50.00	£50.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Permit	per application	£15.00	£15.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Unlicensed Family Entertainment Centre Permits (set by regulation)					
Environment	Public Protection (Licensing)	Application for FEC Permit	per application	£300.00	£300.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Renewal every 10 years	per application	£300.00	£300.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Existing operator Grant	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Change of name	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Permit	per application	£15.00	£15.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Prize Gaming Permits (set by regulation)					
Environment	Public Protection (Licensing)	Application for Prize Gaming Permit	per application	£300.00	£300.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Renewal	per application	£300.00	£300.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Existing operator application	per application	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Change of name	per application	£25.00	£25.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of Permit	per application	£15.00	£15.00	£0.00	0.0%
Environment	Public Protection (Food & Safety)	Stores Licence (First licence application - up to 2000kg) 1 year	per application	£189.00	£202.00	£13.00	6.9%
Environment	Public Protection (Food & Safety)	Stores Licence (First licence application - up to 2000kg) 2 years	per application	£248.00	£266.00	£18.00	7.3%
Environment	Public Protection (Food & Safety)	Stores Licence (First licence application - up to 2000kg) 3 years	per application	£311.00	£333.00	£22.00	7.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Food & Safety)	Stores Licence (First licence application - up to 2000kg) 4 years	per application	£382.00	£409.00	£27.00	7.1%
Environment	Public Protection (Food & Safety)	Stores Licence (First licence application - up to 2000kg) 5 years	per application	£432.00	£463.00	£31.00	7.2%
Environment	Public Protection (Food & Safety)	Renewal of Storage Licence (up to 2000kg) 1 year	per application	£88.00	£94.00	£6.00	6.8%
Environment	Public Protection (Food & Safety)	Renewal of Storage Licence (up to 2000kg) 2 years	per application	£150.00	£161.00	£11.00	7.3%
Environment	Public Protection (Food & Safety)	Renewal of Storage Licence (up to 2000kg) 3 years	per application	£211.00	£226.00	£15.00	7.1%
Environment	Public Protection (Food & Safety)	Renewal of Storage Licence (up to 2000kg) 4 years	per application	£272.00	£291.00	£19.00	7.0%
Environment	Public Protection (Food & Safety)	Renewal of Storage Licence (up to 2000kg) 5 years	per application	£333.00	£357.00	£24.00	7.2%
Environment	Public Protection (Food & Safety)	Registration to store explosives (First Registration) up to 250 kg 1 year	per application	£111.00	£119.00	£8.00	7.2%
<b>D</b> ivironment	Public Protection (Food & Safety)	Registration to store explosives (First Registration) up to 250 kg 2 years	per application	£144.00	£154.00	£10.00	6.9%
(Phvironment	Public Protection (Food & Safety)	Registration to store explosives (First Registration) up to 250 kg 3 years	per application	£177.00	£190.00	£13.00	7.3%
N Environment ယ	Public Protection (Food & Safety)	Registration to store explosives (First Registration) up to 250 kg 4 years	per application	£211.00	£226.00	£15.00	7.1%
Environment	Public Protection (Food & Safety)	Registration to store explosives (First Registration) up to 250 kg 5 years	per application	£243.00	£260.00	£17.00	7.0%
Environment	Public Protection (Food & Safety)	Renewal of Registration up to 250kg 1 year	per application	£55.00	£59.00	£4.00	7.3%
Environment	Public Protection (Food & Safety)	Renewal of Registration up to 250kg 2 years	per application	£88.00	£94.00	£6.00	6.8%
Environment	Public Protection (Food & Safety)	Renewal of Registration up to 250kg 3 years	per application	£123.00	£132.00	£9.00	7.3%
Environment	Public Protection (Food & Safety)	Renewal of Registration up to 250kg 4 years	per application	£155.00	£166.00	£11.00	7.1%
Environment	Public Protection (Food & Safety)	Renewal of Registration up to 250kg 5 years	per application	£189.00	£202.00	£13.00	6.9%
Environment	Public Protection (Food & Safety)	Transfer of Licence or Registration	per application	£37.00	£40.00	£3.00	8.1%
Environment	Public Protection (Food & Safety)	Replacement of Licence or Registration if lost	per application	£37.00	£40.00	£3.00	8.1%
Environment	Public Protection (Food & Safety)	Supply of Adult	per application	£500.00	£500.00	£0.00	0.0%
Environment	Public Protection (Food & Safety)	Not exceeding 2,500 litres for each year	per application	£46.00	£48.00	£2.00	4.3%
Environment	Public Protection (Food & Safety)	Exceeding 2,500 litres and not exceeding 50,000 litres for each year	per application	£62.00	£65.00	£3.00	4.8%
Environment	Public Protection (Food & Safety)	Exceeding 50,000 litres for each year	per application	£131.00	£137.00	£6.00	4.6%
Environment	Public Protection (Env. Control)	Local Air Pollution Prevention and Control (LAPPC) charges (set by regulation)*	* Refer to regulations for exact charging requirements				

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment	_						
Environment	Public Protection (Env. Control)	Standard process	per application	£1,650.00	£1,650.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Additional fee for operating without a permit/regulation 33 direction	per application	£1,188.00	£1,188.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Reduced fee activities	per application	£155.00	£155.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	(except VRs)	per application			£0.00	
Environment	Public Protection (Env. Control)	PVR I & II combined	per application	£257.00	£257.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Vehicle refinishers (VRs)	per application	£362.00	£362.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Reduced fee activities:	per application	£71.00	£71.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Additional fee for operating with a permit/ regulation 33 direction	per application			£0.00	
©nvironment	Public Protection (Env. Control)	Additional Fee Exercising Environment Agency Function in respect of single permit	per application	£279.00	£279.00	£0.00	0.0%
vironment	Public Protection (Env. Control)	Mobile plant (e.g. screening and crushing/cement batching etc) for each permit up to two in number	per application	£1,650.00	£1,650.00	£0.00	0.0%
<b>A</b> vironment	Public Protection (Env. Control)	For the third to seventh mobile plant permit application	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	For the eighth and subsequent applications	per application	£498.00	£498.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Variation of permit under Reg 20- reduced fee activity	per application	£102.00	£102.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Variation of Permit under Reg 20 - Part B or any other solvent activity	per application	£1,050.00	£1,050.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Substantial change which the LA considers meets thresholds for Pt B or solvent emission activity	per application	£1,650.00	£1,650.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)  * (the additional amounts in brackets must be charged where a permit is for a combined Part B and waste installation where Part B installation is subject to reporting under the E-PRTR Regulation)	Additional Charge where Annual subsistence paid by instalments	£38.00	£38.00	£0.00	0.0%
Environment	Public Protection (Env. Control)		Standard process Low	£772.00	£772.00	£0.00	0.0%
Environment	Public Protection (Env. Control)			(+£99)*	(+£99)*	£0.00	
Environment	Public Protection (Env. Control)		Standard process Medium	£1,161.00	£1,161.00	£0.00	0.0%
Environment	Public Protection (Env. Control)			(+£149.00)*	(+£149.00)*	£0.00	
Environment	Public Protection (Env. Control)		Standard process High	£1,747.00	£1,747.00	£0.00	0.0%
Environment	Public Protection (Env. Control)			(+£198.00)*	(+£198.00)*	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Reduced fee activities Low	£79.00	£79.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Reduced fee activities Med	£158.00	£158.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Reduced fee activities High	£237.00	£237.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	PVR I & II combined	£113.00	£113.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	PVR I & II combined	£226.00	£226.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	PVR I & II combined	£341.00	£341.00	£0.00	0.0%
1 Notice of the control of the contr	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Vehicle refinishers - Low	£228.00	£228.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Vehicle refinishers - Med	£365.00	£365.00	£0.00	0.0%
vironment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Vehicle refinishers - High	£548.00	£548.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Late payment fee 1 (new)	£52.00	£52.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	In respect installations the required report on with respect to EC regulation	£104.00	£104.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Additional Charge where LA exercises EA functions under Reg 33-Low risk	£104.00	£104.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Additional Charge where LA exercises EA functions under Reg 33- Medium risk	£156.00	£156.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	to confirm Low risk rating following change of operator	£78.00	£78.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Additional Charge where LA exercises EA functions under Reg 33 - High risk	£207.00	£207.00	£0.00	0.0%

### Appendix 4 - Fees & Charges 2025-26

### Fees prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Env. Control)	Annual Subsistence charge (set by DEFRA in regulations and subject to change)	Reduced fee where below part B threshold, temporarily but will resume- All Subsistence's fees are reduced by 40% subject to terms & Admin fee	£52.00	£52.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	Standard process transfer	£169.00	£169.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	Standard process partial transfer	£497.00	£497.00	£0.00	0.0%
Divironment	Public Protection (Env. Control)	Transfer	Standard process total transfer	£169.00	£169.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	Mobile Plant fixed period transfer to hirer	£53.00	£53.00	£0.00	0.0%
Privironment	Public Protection (Env. Control)	Transfer	Second mobile plant instance, same authority - compliance	£0.00	£0.00	£0.00	
Environment	Public Protection (Env. Control)	Transfer	Second mobile plant instance, same authority - evidence of non- compliance	£53.00	£53.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	New operator at low risk reduced fee activity	£75.00	£75.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	Reduced fee activities: Partial Transfer	£47.00	£47.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Surrender	Notification of Surrender	£0.00	£0.00	£0.00	
Environment	Public Protection (Env. Control)	Substantial change	Standard process	£1,050.00	£1,050.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Substantial change	Standard process where the substantial change results in a new EPR activity	£1,650.00	£1,650.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Substantial change	Reduced fee activities	£102.00	£102.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	LAPPC mobile plant charges (set by regulation)					
Environment	Public Protection (Env. Control)	Number of permits					
Environment	Public Protection (Env. Control)	1	per application	£1,650.00	£1,650.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Env. Control)	2	per application	£1,650.00	£1,650.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	3	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	4	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	5	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	6	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	7	per application	£985.00	£985.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	8 and over	per application	£498.00	£498.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Number of permits					
Environment	Public Protection (Env. Control)	1	Subsistence - low	£626.00	£626.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	2	Subsistence - low	£626.00	£626.00	£0.00	0.0%
<del>- En</del> vironment	Public Protection (Env. Control)	3	Subsistence - low	£385.00	£385.00	£0.00	0.0%
① nvironment	Public Protection (Env. Control)	4	Subsistence - low	£385.00	£385.00	£0.00	0.0%
nvironment Environment	Public Protection (Env. Control)	5	Subsistence - low	£385.00	£385.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	6	Subsistence - low	£385.00	£385.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	7	Subsistence - low	£385.00	£385.00	£0.00	0.0%
<b>S</b> vironment	Public Protection (Env. Control)	8 and over	Subsistence - low	£198.00	£198.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Number of permits					
Environment	Public Protection (Env. Control)	1	subsistence - medium	£1,034.00	£1,034.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	2	subsistence - medium	£1,034.00	£1,034.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	3	subsistence - medium	£617.00	£617.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	4	subsistence - medium	£617.00	£617.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	5	subsistence - medium	£617.00	£617.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	6	subsistence - medium	£617.00	£617.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	7	subsistence - medium	£617.00	£617.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	8 and over	subsistence - medium	£314.00	£314.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Number of Permits					
Environment	Public Protection (Env. Control)	1	subsistence - high	£1,551.00	£1,551.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	2	subsistence - high	£1,551.00	£1,551.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	3	subsistence - high	£924.00	£924.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	4	subsistence - high	£924.00	£924.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	5	subsistence - high	£924.00	£924.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	6	subsistence - high	£924.00	£924.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	7	subsistence - high	£924.00	£924.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Env. Control)	8 and over	subsistence - high	£473.00	£473.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	LA-IPPC (Part A2 charges) (set by regulation)					
Environment	Public Protection (Env. Control)	Application	per application	£3,363.00	£3,363.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Late application additional fee	per application	£1,188.00	£1,188.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence Low	per application	£1,343.00	£1,343.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence Medium	per application	£1,507.00	£1,507.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual Subsistence High	per application	£2,230.00	£2,230.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Annual subsistence charge- paid by instalments additional charge	per application	£38.00	£38.00	£0.00	0.0%
Page Environment 218	Public Protection (Env. Control)	Annual Subsistence charge- reduction	Reduced fee where below part B threshold, temporarily but will resume- All subsistence's fees are reduced by 40% subject to terms & Admin fee	£52.00	£52.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Late payment fee (New)	per application	£52.00	£52.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Substantial variation	per application	£1,368.00	£1,368.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Transfer	per application	£235.00	£235.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Partial transfer	per application	£698.00	£698.00	£0.00	0.0%
Environment	Public Protection (Env. Control)	Surrender	per application	£698.00	£698.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Alterations/extensions to an existing single dwellinghouse (excluding flats)	Single dwellinghouse		£528.00	£528.00	
Planning	Planning	Planning Application (Householder applications) Alterations/Extensions to a single Dwelling house, including works within boundary	Single dwellinghouse	£258.00	£262.00	£4.00	
Planning	Planning	Outline Applications - see below					
Planning	Planning	Planning application (Outline applications) - Site area not more than 0.5 hectares	For each 0.1 hectare (or part thereof)	£578.00	£588.00	£10.00	
Planning	Planning	Planning Application (outline applications) - Site area between 0.5 hectares and 2.5 hectares	For each 0.1 hectare (or part thereof)	£624.00	£635.00	£11.00	
Pag @anning 21	Planning	Planning Application (outline applications) - Site area more than 2.5 hectares	£186 for each additional 0.1 hectare (or part thereof) Maximum fee £202,500	£15,433+ £186 for each additional 0.1 hectare (or part thereof) in excess of 2.5 hectares Maximum fee of £202,500	£15,695 + £189 for each additional 0.1 hectare (or part thereof) in excess of 2.5 hectares Maximum fee of £205,943	£0.00	
Planning	Planning	Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) Alterations/extensions to existing dwellinghouse see below					
Planning	Planning	Planning Application (Full applications and first submissions of Reserved Matters; or Technical Details Consent) Alterations/extensions to dwellinghouses, including works within boundaries - see below					
Planning	Planning	Alterations/Extensions to dwellinghouse, including works within boundaries	Single dwellinghouse (or single flat)	£258.00	£528.00	£270.00	
Planning	Planning	Alterations/Extensions to dwellinghouse, including works within boundaries	Two or more dwellinghouses (or two or more flats)	£509.00	£1,043.00	£534.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE						1	
Planning							
Planning	Planning	Planning Application (Full applications and first submissions of Reserved Matters; or Technical Details Consent) The erection of dwellinghouses - see below					
Planning	Planning	Erection of dwellinghouses	Not more than 10 dwelling houses each	£578.00	£588.00	£10.00	1.7%
Planning	Planning	Erection of dwellinghouses	Between 10 and 50 dwellinghouses	£624.00	£635.00	£11.00	1.8%
利 nning ぬ の の の	Planning	Erection of dwellinghouses	More than 50 dwellinghouses	£30,860 + £186 for each additional dwellinghouse in excess of 50. Maximum fee of £405,000	£31,385 + £189 for each additional dwellinghouse in excess of 50 Maximum fee of £411,885	£0.00	
e 22 Onning	Planning	Planning Application (Full applications and first submissions of Reserved Matters; of Technical Details Consent) - Erection of buildings (not dwellinghouse, agricultural, glasshouse, plant nor machinery) see below					
Planning	Planning	Gross floor space to be created by the development	No increase in gross floor space or no more than 40 square metres	£293.00	£298.00	£5.00	1.7%
Planning	Planning	Gross floor space to be created by the development	More than 40 square metres but no more than 1,000 square metres £578 for each 75 square metres (or part thereof).	£578 for each 75 square metres (or part thereof).	£588.00	£0.00	
Planning	Planning	Gross floor space to be created by the development	Between 1,000 square metres and 3,750 square metres. £624 for each 75 square metres (or part thereof)	£624 for each 75 square metres (or part thereof)	£635.00	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE	1						
Planning							
Planning	Planning	Gross floor space to be created by the development	More than 3,750 square metres. £186 for each additional 75 square metres (or part thereof)	£30,680 + £186 for each additional 75 square metres (or part thereof) in excess of 3,750 square metres Maximum fee of £405,000	£31,385** + £189 for each additional 75 square metres (or part thereof) in excess of 3,750 square metres Maximum fee of £411,885	£0.00	
Planning	Planning	Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) The erecting of buildings (on land used for agriculture for agricultural purposes) see below					
<del>-Nla</del> nning	Planning	Gross floor space to be created by the development	Not more than 465 square metres	£120.00	£122.00	£2.00	1.7%
Canning	Planning	Gross floor space to be created by the development	More than 465 square metres but not more that 540 square metres	£578.00	£588.00	£10.00	1.7%
Planning	Planning	Gross floor space to be created by the development	More than 540 square metres but not more than 1,000 square metres	£578 for first 540 square metres + £578 for each additional 75 square metres in excess of 540 square metres	£588 for first 540 square metres + £588 for each additional 75 square metres in excess of 540 square metres	£0.00	
Planning	Planning	Gross floor space to be created by the development	Between 1,000 square metres and 4.215 square metres	£624 for first 1,000 square metres + £624 for each additional 75 square metres in excess of 1,000 square metres.	£5,077** for first 1,000 square metres + £635 for each additional 75 square metres in excess of 1,000 square metres	£0.00	
Planning	Planning	Gross floor space to be created by the development	More than 4,215 square metres	£30,860 + £186 for each additional square metres (or part thereof) in excess of 4,215 square metres Maximum fee of £405,000	£31,385 + £189 for each additional 75 square metres (or part thereof) in excess of 4,215 square metres Maximum fee of £411,885	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) Erection of glasshouses (on land used for the purposes of agriculture) see below					
Planning	Planning	Gross floor space to be created by the development	Not more than 465 square metres	£120.00	£122.00	£2.00	1.7%
Planning	Planning	Gross floor space to be created by the development	More than 465 square metres but not more than 1,000 square metres	£3,225.00	£3,280.00	£55.00	1.7%
Planning	Planning	Gross floor space to be created by the development	1,000 square metres or more	£3,483.00	£3,542.00	£59.00	1.7%
Pag <sub>anning</sub>	Planning	Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) Erection/alterations/replacement of plant and machinery. See below.					
Planning	Planning	Site area	Not more than 1 hectare	£578 for each 0.1 hectare (or part thereof	£588.00	£0.00	
Planning	Planning	Site area	More than 1 hectare but not more than 5 hectares	£624 for each 0.1 hectare (or part thereof)	£635.00	£0.00	
Planning	Planning	Site area	More than 5 hectares	£30,860 + £186 for each additional 0.1 hectare (or part thereof) in excess of 5 hectares Maximum fee of £405,000	£31,385 + £189 for each additional 0.1 hectare (or part thereof) in excess of 5 hectares Maximum fee of £411,885	£0.00	
Planning	Planning	Full Applications (and First Submissions of Reserved Matters; or Technical Details Consent) Applications other than Building Works. See below.					
Planning	Planning	Car parks, service roads or other accesses (for existing uses)		£293.00	£298.00	£5.00	1.7%
Planning	Planning	Waste (Use of land for disposal of refuse or waste materials or deposit of material remaining after extraction of storage of minerals) - SITE AREA	Not more than 15 hectares	£316 for each 0.1 hectare (or part thereof)	£321.00	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Waste (Use of land for disposal of refuse or waste materials or deposit of material remaining after extraction of storage of minerals) - SITE AREA	More than 15 hectares	£47,161 + £186 for each additional 0.1 hectare (or part thereof) in excess of 15 hectares Maximum fee of £105,300	£47,963 + £189 for each additional 0.1 hectare (or part thereof) in excess of 15 hectares Maximum fee of £107,090	£0.00	
Planning	Planning	Operations connected with exploratory drilling of oil or natural gas - SITE AREA	Not more than 7.5 hectares	£686 for each 0.1 hectare (or part thereof)	£698.00	£0.00	
刑mnning の の の	Planning	Operations connected with exploratory drilling of oil or natural gas - SITE AREA	More than 7.5 hectares	£51,395 + £204 for each additional 0.1 hectare (or part thereof) in excess of 7.5 hectares.  Maximum fee of £405,000	£52,269 + £207 for each additional 0.1 hectare (or part thereof) in excess of 7.5 hectares. Maximum fee of £411,885	£0.00	
Sanning	Planning	Operations (other than exploratory drilling) for the winning and working of oil or natural gas	Not more than 15 hectares	£347 for each 0.1 hectare (or part thereof)	£353.00	£0.00	
Planning	Planning	Operations (other than exploratory drilling) for the winning and working of oil or natural gas	More than 15 hectares	£52,002 + additional £204 for each 0.1 hectare in excess of 15 hectares Maximum fee of £105,300	£52,886 + additional £207 for each 0.1 hectare in excess of 15 hectares Maximum fee of £107,090	£0.00	
Planning	Planning	Other operations (winning and working of minerals) excluding oil and natural gas	Not more than 15 hectares	£316 for each 0.1 hectare (or part thereof)	£321.00	£0.00	
Planning	Planning	Other operations (winning and working of minerals) excluding oil and natural gas	More than 15 hectares	£47,161 + additional £186 for each 0.1 hectare in excess of 15 hectares Maximum fee of £105,300	£47,963 + additional £189 for each 0.1 hectare in excess of 15 hectares Maximum fee of £107,090	£0.00	
Planning	Planning	Other operations (not coming within any of the above categories)	Any site area	£293 for each 0.1 hectare (or part thereof) Maximum fee of £2,535	£298.00	£0.00	
Planning	Planning	Change of Use of a building to use as one or more separate dwellinghouses, or other cases	Not more than 10 dwellinghouses	£578 for each dwellinghouse	£588.00	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Change of Use of a building to use as one or more separate dwellinghouses, or other cases	Between 10 and 50 dwellinghouses	£624 for each dwellinghouse	£635.00	£0.00	
Planning	Planning	Change of Use of a building to use as one or more separate dwellinghouses, or other cases	More than 50 dwellinghouses	£30,860 + £186 for each additional dwellinghouse in excess of 50 Maximum fee of £405,000	£31,385 + £189 for each additional dwellinghouse in excess of 50 Maximum fee of £411,885	£0.00	
Planning	Planning	Other changes of use of a building or land	each change of use	£578.00	£588.00	£10.00	1.7%
Planning	Planning	Lawful Development Certificate - See below					
Planning	Planning	Lawful Development Certificate - Existing use or operation - lawful not to comply with any condition or limitation	Per certificate	£293.00	£298.00	£5.00	1.7%
Ganning	Planning	Lawful Development Certificate - Proposed use or operation	Per certificate	50% of corresponding planning application	50% of the full application fee	£0.00	
Manning	Planning	Prior Approval (Under Permitted Development rights) - See below					
Planning	Planning	Prior Approval (Under Permitted Development rights) - Larger Homes Extensions	Per application	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development Rights) - Additional Storeys on a home	Per application	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (Under Permitted Development rights) - Agricultural and Forestry buildings & Operations	Per application	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (Under Permitted Development rights) - Demolition of buildings	Per application	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (Under Permitted Development rights) - Communications (Previously referred to as "Telecommunications Code Systems Operators")	Per application	£578.00	£588.00	£10.00	1.7%
Planning	Planning	Prior Approval (under Permitted Development rights) - Change of use from Commercial/Business/Service (Use Class E), or Betting Office or Pay Day Loan Shop to mixed use including up to two flats (use Class C3)	Per application	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (Under Permitted Development rights) - Change of use of a building and any land within its curtilage from Commercial/Business/Service (Use Class E), Hotels	Per application	£120.00	£240.00	£120.00	100.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
		(Use Class C1), Residential Institutions (Use Class C2), Secure Residential Institutions (Use Class C2A to a State Funded School					
Planning	Planning	Prior Approval (Under Permitted Development rights) - Change of use of a building and any land within its curtilage from an Agricultural Building to a State-Funded School	Per application	£120.00	£240.00	£120.00	100.0%
Planning P S C C	Planning	Prior Approval (Under Permitted Development rights) - Change of Use of a building and any land within its curtilage from an Agricultural Building to a flexible commercial use within Commercial/Business/Service (use Class E), Storage or Distribution (Use Class B8), or Hotels (Use Class C1)	Per application	£120.00	£240.00	£120.00	100.0%
22 23 23 24 25 25 25 25 25 25 25 25 25 25 25 25 25	Planning	Prior Approval (Under Permitted Development rights) - Change of Use of building and any land within its curtilage from Commercial/Business/Service (use Class E to Dwellinghouses (Use Class C3)	Each dwellinghouse	£125.00	£250.00	£125.00	100.0%
Planning	Planning	Prior Approval (Under Permitted Development rights) - Change of Use of a building and any land within its curtilage from an Agricultural Building to Dwellinghouses (Use Class C3)	Per approval	£120; or £258 if it includes building operations in connection with the change of use	£240.00	£0.00	
Planning	Planning	Prior Approval (Under Permitted Development rights) - Change of use of a building from Betting Office, Pay Day Loan Shop, Launderette; a mixed use combining one of these uses and use as Dwellinghouse(s); or Hot Food Takeaways to Dwellinghouses (Use Class C3)	Per approval	£120; or £258 if it includes building operations in connection with the change of use	£516* if it includes building operations in connection with the change of use	£0.00	
Planning	Planning	Prior Approval (Under Permitted Development rights) - Change of Use of a building and any land within its curtilage from Amusement Arcades/Centres and Casinos to Dwellinghouses (Use Class C3)	Per approval	£120; or £258 if it includes building operations in connection with the change of use	£240.00	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Prior Approval (under Permitted Development rights) - Temporary Use of Building or land for the purpose of Commercial Filmmaking and the Associated Temporary Structures, Works, Plant or Machinery required in Connection with that use	Per approval	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development rights) - Provision of Temporary School Buildings on Vacant Commercial Land and the use of that land as a State-funded School for up to 3 Academic Years	Per approval	£120.00	£240.00	£120.00	100.0%
D Manning G O	Planning	Prior Approval (under Permitted Development rights) - Development Consisting of the Erection or Construction a Collection Facility within the Curtilage of a Shop	Per approval	£120.00	£240.00	£120.00	100.0%
N N Manning	Planning	Prior Approval (under Permitted Development rights) - Installation, Alteration or Replacement of other Solar Photovoltaics (PV) equipment on the Roofs of Non-domestic Buildings, up to Capacity of 1 Megawatt	Per approval	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development rights) - Erection, extension, or alternation of a university building	Per approval	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development rights) - Movable structure within the curtilage of a historic visitor attraction, or listed pub/restaurant/etc (from 2 January 2022	Per approval	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development rights) - Erection, extension or alteration on a closed defence site by or on behalf other Crown of single living accommodation and/or non-residential buildings	Per approval	£120.00	£240.00	£120.00	100.0%
Planning	Planning	Prior Approval (under Permitted Development rights) - Construction of new dwellinghouses	Not more than 10 dwellings	£418 for each dwellinghouse	£425 for each dwellinghouse	£0.00	
Planning	Planning	Prior Approval (under Permitted Development rights) - Construction of new dwellinghouses	Between 10 and 50 dwellinghouses	£451 for each dwellinghouse	£459 for each dwellinghouse	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Planning							
Planning	Planning	Prior Approval (under Permitted Development rights) - Construction of new dwellinghouses	More than 50 dwellinghouses	£22,309 + £135 for each dwellinghouse in excess of 50 Maximum fee of £405,000	£22,688 + £137 for each dwellinghouse in excess of 50 Maximum fee of £411,885	£0.00	
Planning	Planning	Reserved Matters - see below					
Planning	Planning	Reserved Matters - Approval of reserved matters following outlying approval	Full fee due or if full fee already paid then	Full fee due; or if full fee already paid, £578	£588.00	£0.00	
Planning	Planning	Removal/Variation/Approval/Discharge of condition - see below					
Planning	Planning	Removal/Variation/Approval/Discharge of condition	following Grant of planning permission	£293.00	£586.00	£293.00	100.0%
Anning Co	Planning	Discharge of condition(s) - Approval of details and/or confirmation that one or more planning condition have been compiled with	Householder permissions	£43.00	£86.00	£43.00	100.0%
O O Planning N	Planning	Discharge of condition(s) - Approval of details and/or confirmation that one or more planning condition have been compiled with	All other permissions	£145.00	£298.00	£153.00	105.5%
Manning	Planning	Advertising					
Planning	Planning	Advertising	Relating to the business on the premises	£165.00	£168.00	£3.00	1.8%
Planning	Planning	Advertising	Advance signs which are not situated on or visible form the site, directing the public to a business	£165.00	£168.00	£3.00	1.8%
Planning	Planning	Advertising	Other advertisements	£578.00	£588.00	£10.00	1.7%
Planning	Planning	Non-material Amendment Following a Grant of Planning Permission					
Planning	Planning	Non-material Amendment Following a grant of Planning permission	Householder developments	£43.00	£44.00	£1.00	2.3%
Planning	Planning	Non-material Amendment Following a grant of Planning permission	Any other development	£293.00	£298.00	£5.00	1.7%
Planning	Planning	Permission in Principle - see below					
Planning	Planning	Permission in Principle	Site area	£503 for each 0.1 hectare (or part thereof)	£0.00	£0.00	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE	•						
<b>Highways Operations</b>							
Highways Operations	Highways	Hackney Carriage Vehicle - Initial Licence	Annual	£240.00	£240.00	£0.00	0.0%
Highways Operations	Highways	Hackney Carriage Vehicle - Annual Renewal	Annual	£227.00	£227.00	£0.00	0.0%
Highways Operations	Highways	Hackney/Private Hire Drivers - 3 year Initial Application	Annual	£293.00	£293.00	£0.00	0.0%
Highways Operations	Highways	Hackney/Private Hire Drivers - 3 year	Annual	£267.00	£267.00	£0.00	0.0%
Highways Operations	Highways	Private Carriage Vehicle - Initial Licence	Annual	£240.00	£240.00	£0.00	0.0%
Highways Operations	Highways	Private Carriage Vehicle - Annual Renewal	Annual	£227.00	£227.00	£0.00	0.0%
Highways Operations	Highways	Private Hire Operator - 5 year	Annual	£590.00	£590.00	£0.00	0.0%
Highways Operations	Highways	DBS check for all drivers licences	3 yearly	£60.00	£60.00	£0.00	0.0%
ighways Operations	Highways	Vehicle Transfer - (ownership vehicle - without new plates)	Per vehicle	£48.00	£48.00	£0.00	0.0%
<b>(D</b> ighways Operations	Highways	Vehicle Transfer - (Ownership with new plates, HCV to PHV, PHV to HCV & Private Hire)	Per vehicle	£100.00	£100.00	£0.00	0.0%
Nighways Operations	Highways	Vehicle Transfer - (to another vehicle) Based on no. of months left on existing licence:					
Highways Operations	Highways	11 Months	Per vehicle	£74.00	£74.00	£0.00	0.0%
Highways Operations	Highways	10 Months	Per vehicle	£85.00	£85.00	£0.00	0.0%
Highways Operations	Highways	9 Months	Per vehicle	£96.00	£96.00	£0.00	0.0%
Highways Operations	Highways	8 Months	Per vehicle	£107.00	£107.00	£0.00	0.0%
Highways Operations	Highways	7 Months	Per vehicle	£118.00	£118.00	£0.00	0.0%
Highways Operations	Highways	6 Months (Plates surrendered before fleet inspection due to be carried out)	Per vehicle	£129.00	£129.00	£0.00	0.0%
Highways Operations	Highways	6 Months (fleet inspection carried out before plates surrendered)	Per vehicle	£156.00	£156.00	£0.00	0.0%
Highways Operations	Highways	5 Months	Per vehicle	£166.00	£166.00	£0.00	0.0%
Highways Operations	Highways	4 Months	Per vehicle	£178.00	£178.00	£0.00	0.0%
Highways Operations	Highways	3 Months	Per vehicle	£189.00	£189.00	£0.00	0.0%
Highways Operations	Highways	2 Months	Per vehicle	£200.00	£200.00	£0.00	0.0%
Highways Operations	Highways	1 Month	Per vehicle	£211.00	£211.00	£0.00	0.0%
Highways Operations	Highways	Scrap Metal Site Licence (3 Years)	Per site	£667.10	£667.10	£0.00	0.0%
Highways Operations	Highways	Scrap Metal Collectors Licence (3 Years)	Per collector	£467.00	£467.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Adults							
Adults	Court of Protection	For clients with capital assets above £20,300 the following fixed costs are issued by the Court of Protection under a practice direction for Local Authorities					
Adults	Court of Protection	Set-up fee (work up to and including the application)	Per application	£944.00	£944.00	£0.00	0.0%
Adults	Court of Protection	First year's fee	Per year	£982.00	£982.00	£0.00	0.0%
Adults	Court of Protection	Second and subsequent years' fee	Per year	£824.00	£824.00	£0.00	0.0%
Adults	Court of Protection	Annual account fee	Per account	£274.00	£274.00	£0.00	0.0%
Adults	Court of Protection	Annual Property management fee	Per account	£380.00	£380.00	£0.00	0.0%
Adults	Court of Protection	Preparation HMRC tax return	Per return	£89.00	£89.00	£0.00	0.0%
Adults	Court of Protection	Public authority and other third sector deputies are allowed the fixed rate of £51 per hour for travel costs	Per hour	£51.00	£51.00	£0.00	0.0%
Hults	Court of Protection	For clients with capital assets below £20,300 the following fixed costs are issued by the Court of Protection under a practice direction for Local Authorities	·				
<b>O</b> Adults	Court of Protection	Set-up fee (work up to and including the application)	Per application	£944.00	£944.00	£0.00	0.0%
Adults Adults Adults Adults	Court of Protection	* Annual management Fee	Per account	3.5% of capital assets	3.5% of capital assets	£0.00	
Adults	Court of Protection	Annual account fee	Per account	£274.00	£274.00	£0.00	0.0%
Adults	Court of Protection	* Annual Property management fee	Per account	£380.00	£380.00	£0.00	0.0%
Adults	Court of Protection	Preparation of a basic HMRCtax return (bank or NS&I interest and taxable benefits)	Per return	£89.00	£89.00	£0.00	0.0%
Adults	Court of Protection	Preparation of a Complex HMRC income tax return (bank or NS&I interest, taxable benefits, small investment portfolio)	Per return	£89.00	£89.00	£0.00	0.0%
Adults	Court of Protection	Public authority and other third sector deputies are allowed the fixed rate of £51 per hour for travel costs	Per hour	£51.00	£51.00	£0.00	0.0%
		*Capital disregard of the first £2k applies					

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
CHIEF EXECUTIVE							
Legal & Governance			<del>,                                      </del>				
Legal & Governance	Registration	Statutory marriage ceremony or civil partnership registration	Per Ceremony	£46.00	£56.00	£10.00	21.7%
Legal & Governance	Registration	Civil Partnership paperwork conversion to marriage	Per Ceremony	£45.00	£50.00	£5.00	11.1%
Legal & Governance	Registration	Register Marriage in a Registered Building	Per Ceremony	£86.00	£86.00	£0.00	0.0%
Legal & Governance	Registration	Civil Partnership Declaration (prior to celebration of marriage ceremony)	Per Ceremony	£27.00	£30.00	£3.00	11.1%
Legal & Governance	Registration	Notice of Marriage and Civil Partnership	Per person	£35.00	£42.00	£7.00	20.0%
Legal & Governance	Registration	Notice of Marriage and Civil Partnership for any person subject to the Home Office referral and Investigation Scheme	Per person	£47.00	£57.00	£10.00	21.3%
Tegal & Governance	Registration	All certificates 2nd class post	Per Certificate	£11.00	£12.50	£1.50	13.6%
gal & Governance	Registration	Express certificate service	Per Certificate	£35.00	£38.50	£3.50	10.0%
Regal & Governance	Registration	Corrections to Initial Registration - Forename added within 12 months of birth registration	Per Amendment	£40.00	£44.00	£4.00	10.0%
လ ယ ဇ္ဈေal & Governance	Registration	Corrections to Initial Registration - Consideration by Registrar / Superintendent Registrar of a correction application	Per Amendment	£75.00	£83.00	£8.00	10.7%
Legal & Governance	Registration	Corrections to Initial Registration - Consideration by the Registrar General of a correction application	Per Amendment	£90.00	£99.00	£9.00	10.0%
Legal & Governance	Registration	Consideration by a Superintendent Registrar of a foreign divorce/civil partnership dissolution obtained outside of the British Isles	Per Divorce	£50.00	£55.00	£5.00	10.0%
Legal & Governance	Registration	Consideration by the Registrar General of a divorce/civil partnership dissolution obtained outside of the British Isles	Per Divorce	£75.00	£83.00	£8.00	10.7%
Legal & Governance	Customer Services	Blue Badge Admin fee	Per Badge	£10.00	£10.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Licensing - dangerous wild animals	per licence	£330.00	£340.00	£10.00	3.0%
Environment	Public Protection (Licensing)	Licensing - Dangerous wild animal - renewal	per renewal	£225.00	£230.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Licensing - Dangerous wild animal - amendment of existing licence	per licence	£50.00	£52.00	£2.00	4.0%
Environment	Public Protection (Licensing)	Licensing - Zoo - initial application	per application	£1,200.00	£1,230.00	£30.00	2.5%
Environment	Public Protection (Licensing)	Licensing - Zoo - initial application under 14(1)a	per application	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Licensing)	Licensing - Zoo - initial application under 14(1)b	per application	£215.00	£220.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Licensing - Zoo - initial application under 14(2)	per application	£215.00	£220.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Licensing - Zoo - grant/renewal (including annual visits) under 14(1) b	per application	£270.00	£280.00	£10.00	3.7%
Environment	Public Protection (Licensing)	Licensing - Zoo - grant/renewal (including annual visits) under 14(2)	per application	£600.00	£615.00	£15.00	2.5%
Environment	Public Protection (Licensing)	Licensing - Zoo - grant/renewal (including annual visits) full zoo licence	per licence	£1,350.00	£1,380.00	£30.00	2.2%
<b>G</b> nvironment	Public Protection (Licensing)	Licensing - Zoo - amendment existing licence	per licence	£50.00	£52.00	£2.00	4.0%
<b>P</b> ivironment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	First Hour	£110.00	£115.00	£5.00	4.5%
Wironment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	First Hour - film festival (1-25 films)	£110.00	£115.00	£5.00	4.5%
Environment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	First Hour - film festival (26-50 films)	£140.00	£145.00	£5.00	3.6%
Environment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	Additional fee for each additional 15 minutes or part thereof	£25.00	£26.00	£1.00	4.0%
Environment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	Admin Fee - general	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	Admin Fee - film festival (1-25)	40	£42.00	£2.00	5.0%
Environment	Public Protection (Licensing)	Film Classification - Licensing Act 2003	Admin Fee - film festival (26-50)	£40.00	£42.00	£2.00	5.0%
Environment	Public Protection (Food & Safety)	Transfer of Licence	per application	£12.00	£12.00	£0.00	0.0%
Environment	Public Protection (Food & Safety)	Replacement of Licence	per application	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Food & Safety)	File Search	per application	£100.00	£102.00	£2.00	2.0%
Environment	Public Protection (Licensing)	Sex Establishments - initial application	per licence	£2,150.00	£2,200.00	£50.00	2.3%
Environment	Public Protection (Licensing)	Sex Establishments - fee for annual renewal or transfer	per licence	£1,075.00	£1,100.00	£25.00	2.3%
Environment	Public Protection (Licensing)	Sexual Entertainments Venues - Initial application	per licence	£3,900.00	£4,000.00	£100.00	2.6%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Sexual Entertainments Venues - renewal	per licence	£2,000.00	£2,050.00	£50.00	2.5%
Environment	Public Protection (Licensing)	Hypnotism Permit - One off event	per licence	£135.00	£140.00	£5.00	3.7%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - New application	per application	£150.00	£155.00	£5.00	3.3%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - renewal	per application	£115.00	£120.00	£5.00	4.3%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - grant fee yr 1 new	per application	£225.00	£230.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - grant fee yr 1 renewal	per application	£205.00	£210.00	£5.00	2.4%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - grant fee yr 2 New	per application	£260.00	£270.00	£10.00	3.8%
လ Gnvironment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals - grant fee yr 2 renewal	per application	£245.00	£250.00	£5.00	2.0%
Φ Fovironment ω	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals grant fee yr 3 New	per application	£330.00	£340.00	£10.00	3.0%
Vironment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) up to 6 animals grant fee yr 3 renewal	per application	£300.00	£310.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - application New	per application	£180.00	£185.00	£5.00	2.8%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - application renewal	per application	£135.00	£140.00	£5.00	3.7%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 1 New	per application	£250.00	£260.00	£10.00	4.0%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 1 renewal	per application	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 2 New	per application	£300.00	£310.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 2 renewal	per application	£275.00	£280.00	£5.00	1.8%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 3 New	per application	£375.00	£385.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 7-10 animals - grant fee yr 3 renewal	per application	£345.00	£355.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - New application	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - renewal	per application	£150.00	£155.00	£5.00	3.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 1 New	per application	£280.00	£290.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 1 renewal	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 2 New	per application	£365.00	£375.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 2 renewal	per application	£335.00	£345.00	£10.00	3.0%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 3 New	per application	£435.00	£445.00	£10.00	2.3%
Environment	Public Protection (Licensing)	Animal Boarding: Home Boarding (Dogs) 11 and over animals - grant fee yr 3 renewal	per application	£395.00	£405.00	£10.00	2.5%
<del>- [ŋ</del> vironment	Public Protection (Licensing)	Home boarding - Franchise, Arranger Licence New	per application	£160.00	£165.00	£5.00	3.1%
<b>D</b> ivironment	Public Protection (Licensing)	Home boarding - Franchise, Arranger Licence Renewal	per application	£95.00	£100.00	£5.00	5.3%
vironment	Public Protection (Licensing)	Admin fee update of Arranger Licence	per request	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Licensing)	Home boarding - Host Family out of scope one off payment	per application	£140.00	£145.00	£5.00	3.6%
<b>En</b> vironment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - new application	per application	£150.00	£155.00	£5.00	3.3%
(Pa)vironment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - Renewal	per application	£115.00	£120.00	£5.00	4.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 1 New	per application	£220.00	£225.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 1 renewal	per application	£200.00	£205.00	£5.00	2.5%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 2 New	per application	£260.00	£270.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 2 renewal	per application	£240.00	£245.00	£5.00	2.1%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 3 New	per application	£320.00	£330.00	£10.00	3.1%
Environment	Public Protection (Licensing)	Day Care (Dogs) - up to 6 animals - grant fee yr 3 renewal	per application	£290.00	£300.00	£10.00	3.4%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - new application	per application	£180.00	£185.00	£5.00	2.8%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - Renewal	per application	£135.00	£140.00	£5.00	3.7%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 1 New	per application	£250.00	£260.00	£10.00	4.0%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 1 renewal	per application	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 2 New	per application	£300.00	£310.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 2 renewal	per application	£270.00	£280.00	£10.00	3.7%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 3 New	per application	£370.00	£380.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 7-10 animals - grant fee yr 3 renewal	per application	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - new application	per application	£190.00	£195.00	£5.00	2.6%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - Renewal	per application	£150.00	£155.00	£5.00	3.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 1 New	per application	£280.00	£290.00	£10.00	3.6%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
			,	£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 1 renewal	per application	£260.00	£270.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 2 New	per application	£365.00	£375.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 2 renewal	per application	£330.00	£340.00	£10.00	3.0%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 3 New	per application	£460.00	£470.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 11 to 30 animals - grant fee yr 3 renewal	per application	£400.00	£410.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals -New	per application	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals -Renewal	per application	£175.00	£180.00	£5.00	2.9%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 1 New	per application	£300.00	£310.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 1 renewal	per application	£275.00	£280.00	£5.00	1.8%
<del>- En</del> vironment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 2 New	per application	£375.00	£385.00	£10.00	2.7%
nvironment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 2 renewal	per application	£340.00	£350.00	£10.00	2.9%
<b>A</b> nvironment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 3 New	per application	£445.00	£455.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 31 to 60 animals - grant fee yr 3 renewal	per application	£400.00	£410.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -new application	per application	£280.00	£290.00	£10.00	3.6%
<b>A</b> vironment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals Renewal	per application	£305.00	£315.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 1 New	per application	£320.00	£330.00	£10.00	3.1%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 1 renewal	per application	£290.00	£300.00	£10.00	3.4%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 2 New	per application	£395.00	£405.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 2 renewal	per application	£355.00	£365.00	£10.00	2.8%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 3 New	per application	£445.00	£455.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Day Care (Dogs) - 61 and over animals -grant fee yr 3 renewal	per application	£400.00	£410.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - New Application	per application	£180.00	£185.00	£5.00	2.8%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - Renewal	per application	£135.00	£140.00	£5.00	3.7%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 1 New	per application	£225.00	£230.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 1 renewal	per application	£215.00	£220.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 2 New	per application	£280.00	£290.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 2 renewal	per application	£255.00	£265.00	£10.00	3.9%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 3 New	per application	£345.00	£355.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Catteries - up to 10 animals - grant fee yr 3 renewal	per application	£315.00	£325.00	£10.00	3.2%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - New Application	per application	£200.00	£205.00	£5.00	2.5%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - Renewal	per application	£155.00	£160.00	£5.00	3.2%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 1 New	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 1 Renewal	per application	£240.00	£245.00	£5.00	2.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day	Approved charges	2025/26 Proposed	Increase /	Increase /
			etc)	2024/25	charge	(Decrease)	(Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 2 New	per application	£345.00	£355.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 2 renewal	per application	£315.00	£325.00	£10.00	3.2%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 3 New	per application	£410.00	£420.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Catteries - 11 to 30 animals - grant fee yr 3 renewal	per application	£370.00	£380.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -New Application	per application	£245.00	£250.00	£5.00	2.0%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -Renewal	per application	£190.00	£195.00	£5.00	2.6%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 1 New	per application	£290.00	£300.00	£10.00	3.4%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 1 renewal	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 2 New	per application	£355.00	£365.00	£10.00	2.8%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 2 renewal	per application	£325.00	£335.00	£10.00	3.1%
Environment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 3 New	per application	£415.00	£425.00	£10.00	2.4%
<b>Ho</b> vironment	Public Protection (Licensing)	Catteries - 31 to 60 animals -grant fee yr 3 renewal	per application	£375.00	£385.00	£10.00	2.7%
hvironment	Public Protection (Licensing)	Catteries - 61 plus animals - New Application	per application	£265.00	£275.00	£10.00	3.8%
nvironment	Public Protection (Licensing)	Catteries - 61 plus animals -Renewal	per application	£220.00	£225.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Catteries - 61 plus animals -grant fee yr 1 New	per application	£295.00	£305.00	£10.00	3.4%
<b>(50)</b> vironment	Public Protection (Licensing)	Catteries - 61 plus animals -grant fee yr 1 renewal	per application	£270.00	£280.00	£10.00	3.7%
Privironment	Public Protection (Licensing)	Catteries - 61 plus animals -grant fee yr 2 New	per application	£375.00	£385.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Catteries - 61 plus animals -grant fee yr 2 Renewal	per application	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Catteries - 61 plus animals -grant fee yr 3 New	per application	£420.00	£430.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Catteries- 61 plus animals -grant fee yr 3 renewal	per application	£380.00	£390.00	£10.00	2.6%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - New Application	per application	£180.00	£185.00	£5.00	2.8%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - Renewal	per application	£140.00	£145.00	£5.00	3.6%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 1 New	per application	£250.00	£250.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 1 Renewal	per application	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 2 New	per application	£300.00	£310.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 2 Renewal	per application	£275.00	£285.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 3 New	per application	£375.00	£385.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Kennels - up to 10 animals - grant fee yr 3 renewal	per application	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals - New Application	per application	£215.00	£220.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals - Renewal	per application	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals - grant fee yr 1 New	per application	£290.00	£300.00	£10.00	3.4%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals - grant fee yr 1 Renewal	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals - grant fee yr 2 New	per application	£365.00	£375.00	£10.00	2.7%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals -grant fee yr 2 Renewal	per application	£325.00	£335.00	£10.00	3.1%
Environment	Public Protection (Licensing)	Kennels - 11 to 30 animals -grant fee yr 3 New	per application	£450.00	£460.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Kennels -11 to 30 animals -grant fee yr 3 renewal	per application	£410.00	£420.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals - New Application	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals - Renewal	per application	£200.00	£205.00	£5.00	2.5%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 1 New	per application	£305.00	£315.00	£10.00	3.3%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 1 Renewal	per application	£280.00	£290.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 2 New	per application	£380.00	£390.00	£10.00	2.6%
Environment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 2 renewal	per application	£340.00	£350.00	£10.00	2.9%
vironment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 3 New	per application	£450.00	£460.00	£10.00	2.2%
hvironment	Public Protection (Licensing)	Kennels - 31 to 60 animals -grant fee yr 3 renewal	per application	£410.00	£420.00	£10.00	2.4%
nvironment	Public Protection (Licensing)	Kennels - 61 to 99 animals - New Application	per application	£290.00	£300.00	£10.00	3.4%
Environment	Public Protection (Licensing)	Kennels - 61 to 99 animals -Renewal	per application	£240.00	£245.00	£5.00	2.1%
<b>(</b> ironment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 1 New	per application	£305.00	£315.00	£10.00	3.3%
Privironment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 1 renewal	per application	£280.00	£290.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 2 New	per application	£400.00	£410.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 2 renewal	per application	£365.00	£375.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 3 New	per application	£450.00	£460.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Kennels - 61 to 99 animals -grant fee yr 3 Renewal	per application	£410.00	£420.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - New Application	per application	£350.00	£360.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - Renewal	per application	£270.00	£280.00	£10.00	3.7%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 1 New	per application	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 1 Renewal	per application	£310.00	£320.00	£10.00	3.2%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 2 New	per application	£410.00	£420.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 2 Renewal	per application	£365.00	£375.00	£10.00	2.7%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 3 New	per application	£450.00	£460.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Kennels - 100+ animals - grant fee yr 3 renewal	per application	£410.00	£420.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Dog Breeding 1 -5 Bitches New application	per application	£280.00	£290.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Dog Breeding 1 -5 Bitches Renewal	per application	£235.00	£240.00	£5.00	2.1%
Environment	Public Protection (Licensing)	Dog Breeding 6-10 Bitches New application	per application	£315.00	£325.00	£10.00	3.2%
Environment	Public Protection (Licensing)	Dog Breeding 6- 10 Bitches Renewal	per application	£265.00	£275.00	£10.00	3.8%
Environment	Public Protection (Licensing)	Dog Breeding - 11 Plus bitches - New Application	per application	£360.00	£370.00	£10.00	2.8%
Environment	Public Protection (Licensing)	Dog Breeding - 11 Plus Bitches - Renewal	per application	£300.00	£310.00	£10.00	3.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Dog Breeding grant fee yr 1 New	per application	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Dog Breeding grant fee yr 1 renewal	per application	£315.00	£325.00	£10.00	3.2%
Environment	Public Protection (Licensing)	Dog Breeding grant fee yr 2 - New	per application	£425.00	£435.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Dog Breeding - grant fee yr 2 renewal	per application	£385.00	£395.00	£10.00	2.6%
Environment	Public Protection (Licensing)	Dog Breeding - grant fee yr 3 New	per application	£505.00	£520.00	£15.00	3.0%
Environment	Public Protection (Licensing)	Dog Breeding grant fee yr 3 renewal	per application	£465.00	£475.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Hiring of horses - up to 10 Horses New Application	per application	£155.00	£160.00	£5.00	3.2%
Environment	Public Protection (Licensing)	Hiring of Horses up to 10 Horses Renewal	per application	£120.00	£125.00	£5.00	4.2%
Environment	Public Protection (Licensing)	Hiring of horses 11-20 Horses New Application	per application	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Licensing)	Hiring of horses 11-20 Horses Renewal	per application	£125.00	£130.00	£5.00	4.0%
Environment	Public Protection (Licensing)	Hiring of horses 21 Plus Horses New Application	per application	£195.00	£200.00	£5.00	2.6%
<b>Ho</b> vironment	Public Protection (Licensing)	Hiring of horses 21 Plus Horses Renewal	per application	£155.00	£160.00	£5.00	3.2%
hvironment	Public Protection (Licensing)	Hiring of Horses -grant fee yr 1 New	per application	£150.00	£155.00	£5.00	3.3%
nvironment	Public Protection (Licensing)	Hiring of Horses -grant fee yr 1 renewal	per application	£135.00	£140.00	£5.00	3.7%
Fryvironment	Public Protection (Licensing)	Hiring of Horses -grant fee yr 2 New	per application	£200.00	£205.00	£5.00	2.5%
<b>(</b> b) vironment	Public Protection (Licensing)	Hiring of Horses - grant fee yr 2 renewal	per application	£180.00	£185.00	£5.00	2.8%
Environment	Public Protection (Licensing)	Hiring of Horses - grant fee yr 3 New	per application	£245.00	£250.00	£5.00	2.0%
Environment	Public Protection (Licensing)	Hiring of Horses - grant fee yr 3 renewal	per application	£220.00	£225.00	£5.00	2.3%
Environment	Public Protection (Licensing)	Hiring of Horse - Minor Change Fee (Replacement of horse)	per application	£35.00	£35.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Selling Animals as Pets (under 10 species) New and Renewal	per application	£200.00	£205.00	£5.00	2.5%
Environment	Public Protection (Licensing)	Selling Animals as Pets (Over 10 species) New and Renewal	per application	£245.00	£250.00	£5.00	2.0%
Environment	Public Protection (Licensing)	Selling Animals as Pets (Under 10 species) grant fee yr 1	per application	£275.00	£285.00	£10.00	3.6%
Environment	Public Protection (Licensing)	Selling Animals as Pets (under 10 species) grant fee yr2	per application	£345.00	£355.00	£10.00	2.9%
Environment	Public Protection (Licensing)	Selling Animals as Pets (under 10 species) grant fee yr3	per application	£415.00	£425.00	£10.00	2.4%
Environment	Public Protection (Licensing)	Selling Animals as Pets (over 10 species) grant fee Y1	per application	£320.00	£330.00	£10.00	3.1%
Environment	Public Protection (Licensing)	Selling Animals as Pets (over 10 species) grant fee Y2	per application	£405.00	£415.00	£10.00	2.5%
Environment	Public Protection (Licensing)	Selling Animals as Pets (over 10 species) grant fee Y3	per application	£460.00	£470.00	£10.00	2.2%
Environment	Public Protection (Licensing)	Exhibition of Animals New	per application	£200.00	£205.00	£5.00	2.5%
Environment	Public Protection (Licensing)	Exhibition of Animals Renewal	per application	£155.00	£160.00	£5.00	3.2%
Environment	Public Protection (Licensing)	Exhibition of Animals grant fee New	per application	£255.00	£265.00	£10.00	3.9%
Environment	Public Protection (Licensing)	Exhibition of Animals grant fee renewal	per application	£225.00	£230.00	£5.00	2.2%
Environment	Public Protection (Licensing)	Cancellation of inspection - less than 24hrs notice	per application	£43.00	£45.00	£2.00	4.7%
Environment	Public Protection (Licensing)	Variation of Licence (no inspection required)	per application	£63.00	£65.00	£2.00	3.2%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Licensing)	Variation of Licence (inspection required)	per application	£85.00	£90.00	£5.00	5.9%
Environment	Public Protection (Licensing)	Re-evaluation of rating	per application	£65.00	£65.00	£0.00	0.0%
Environment	Public Protection (Licensing)	Copy of licence / lost / stolen / damaged etc	per application	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Licensing)	Cancellation of inspection within 24 hours of arranged inspection (to be paid prior to any new inspection agreed)	per cancellation	£43.00	£44.00	£1.00	2.3%
Environment	Public Protection (Dog Warden)	Kennel Charge (1 Day)	per day	£21.00	£22.00	£1.00	4.8%
Environment	Public Protection (Dog Warden)	Kennel Charge (2 Days)	per day	£40.00	£42.00	£2.00	5.0%
Environment	Public Protection (Dog Warden)	Kennel Charge (3 Days)	per day	£58.00	£60.00	£2.00	3.4%
Environment	Public Protection (Dog Warden)	Kennel Charge (4 Days)	per day	£74.00	£76.00	£2.00	2.7%
<b>-En</b> vironment	Public Protection (Dog Warden)	Kennel Charge (5 Days)	per day	£95.00	£98.00	£3.00	3.2%
<b>©</b> nvironment	Public Protection (Dog Warden)	Kennel Charge (6 Days)	per day	£114.00	£118.00	£4.00	3.5%
nvironment Environment	Public Protection (Dog Warden)	Kennel Charge (7 Days)	per day	£133.00	£136.00	£3.00	2.3%
Environment	Public Protection (Dog Warden)	Kennel Charge (8 Days)	per day	£148.00	£152.00	£4.00	2.7%
Environment	Public Protection (Dog Warden)	Stray Dog Administration Fee	per admin fee	£35.00	£36.00	£1.00	2.9%
<b>Go</b> vironment	Public Protection (Dog Warden)	Dog Walking Licence Application to cover 2 years	per application	£100.00	£103.00	£3.00	3.0%
Environment	Public Protection (Dog Warden)	Dog Walking Licence Application to cover 2 years (with existing animal licence)	per application	£85.00	£87.00	£2.00	2.4%
Environment	Public Protection (Dog Warden)	Dog Walking Licence Renewal	per application	£85.00	£87.00	£2.00	2.4%
Environment	Public Protection (Dog Warden)	Dog Walking Licence Renewal (with existing animal licence)	per application	£80.00	£82.00	£2.00	2.5%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - transfer of licence	per application	£12.00	£12.00	£0.00	0.0%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - replacement of licence	per application	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - initial premises registration application (single premises)	per application	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - Personal registration	per application	£75.00	£77.00	£2.00	2.7%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - Additional activity registration	per activity	£100.00	£102.00	£2.00	2.0%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - Transfer of premises registration to new business address	per registration	£225.00	£230.00	£5.00	2.2%
Environment	Public Protection (Food & Safety)	Public Protection - Skin Piercing - Personal registration change of details	per registration	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Unfit food - voluntary surrender certificate (up to £1,000 value)	per certificate	£140.00	£143.00	£3.00	2.1%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Unfit food - voluntary surrender certificate (£1,000 to £10,000)	per certificate	£160.00	£164.00	£4.00	2.5%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Unfit food - voluntary surrender certificate (over £10,000)	per certificate	£175.00	£179.00	£4.00	2.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Export Certificate (each)	per certificate	£145.00	£148.00	£3.00	2.1%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Food Safety Premises Endorsement for Export Certificate	per certificate	£90.00	£92.00	£2.00	2.2%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Food labelling advice (per hour)	per hour	£100.00	£0.00	-£100.00	-100.0%
Environment	Public Protection (Food & Safety)	Public Protection (Food & Safety)	Public Protection  – Skin Piercing temporary personal registration (2 days at named event) per application	£0.00	£28.00	£28.00	
Page 239	Public Protection (Food & Safety)	Public Protection (Food & Safety)	"Public Protection  – Skin Piercing temporary personal registration additional day at named event per application £12"	£0.00	£12.00	£12.00	
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - Food Hygiene Rating System revisit charge	per visit	£230.00	£235.00	£5.00	2.2%
Environment	Public Protection (Food & Safety)	Public Protection - Food Safety - copy of inspection report - lost/damaged (FBO request only)	per application	£27.00	£28.00	£1.00	3.7%
Environment	Public Protection (Trading Standards)	Public Protection - weights & measures - first nozzle tested per site	per site	£195.00	£200.00	£5.00	2.6%
Environment	Public Protection (Trading Standards)	Public Protection - weights & measures - equipment submitted under the measuring instruments (EEC Requirements) Regulations - per hour including travel time	per hour	£100.00	£103.00	£3.00	3.0%
Environment	Public Protection (Trading Standards)	Public Protection - weights & measures - Public weigh bridge operator training	per hour	£100.00	£103.00	£3.00	3.0%
Environment	Public Protection (Trading Standards)	Public Protection - Trading Standards - file search fees	per search	£100.00	£103.00	£3.00	3.0%
Environment	Public Protection (Trading Standards)	Public Protection - Trading Standards - Business advice fee	per search	£100.00	£103.00	£3.00	3.0%
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - sole trader	annual fee	£200.00	£205.00	£5.00	2.5%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment	I = 111 = 1						
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - sole trader	application	£25.00	£50.00	£25.00	100.0%
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - 1-5 employees	annual fee	£285.00	£295.00	£10.00	3.5%
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - 1-5 employees	application	£155.00	£160.00	£5.00	3.2%
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - 6-20 employees	annual fee	£430.00	£440.00	£10.00	2.3%
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - 6-20 employees	application	£215.00	£220.00	£5.00	2.3%
Edvironment	Public Protection (Trading Standards)	Buy With Confidence scheme - 21 - 49 employees	annual fee	£570.00	£585.00	£15.00	2.6%
nvironment	Public Protection (Trading Standards)	Buy With Confidence scheme - 21 - 49 employees	application	£270.00	£280.00	£10.00	3.7%
Privironment	Public Protection (Trading Standards)	Buy With Confidence scheme - over 50 employees.	annual fee	POA	POA	£0.00	
Environment	Public Protection (Trading Standards)	Buy With Confidence scheme - over 50 employees.	application	POA	POA	£0.00	
Environment	Public Protection (Env. Control)	Public Protection - Contaminated land search	per search	£155.00	£160.00	£5.00	3.2%
Environment	Public Protection (Env. Control)	Public Protection - Contaminated land search	per search	£210.00	£215.00	£5.00	2.4%
Environment	Public Protection (Env. Control)	Public Protection - Verified air quality data	per verification	£180.00	£184.00	£4.00	2.2%
Environment	Public Protection (Env. Control)	Public Protection - Exhumation (coordination and attendance)	per exhumation	£320.00	£327.00	£7.00	2.2%
Environment	Public Protection (Env. Control)	Public Health funerals charge (where funds in estate)	per item	£2,600	£2,657.00	£57.00	2.2%
Environment	Public Protection (Env. Control)	Public Health funerals charge (where funds in estate) (burial)	per item	£4,500	£4,599.00	£99.00	2.2%
Environment	Public Protection (Env. Control)	Public Protection - Exhumation (coordination and attendance)	per exhumation	£315.00	£322.00	£7.00	2.2%
Environment	Public Protection (Pest Control)	Pest Control - Rodents for up to 3 visits	3 visits	£140.00	£150.00	£10.00	7.1%
Environment	Public Protection (Pest Control)	Pest Control - Rodents for up to 3 visits - concessionary price	3 visits	£70.00	£75.00	£5.00	7.1%
Environment	Public Protection (Pest Control)	Pest Control - Rodents (additional charge per visit if required to complete existing treatment)	per visit	£45.00	£47.00	£2.00	4.4%
Environment	Public Protection (Pest Control)	Pest Control - Rodents (additional charge per visit if required to complete existing treatment) - concessionary price	per visit	£25.00	£26.00	£1.00	4.0%
Environment	Public Protection (Pest Control)	Pest Control - Wasps	per visit	£82.00	£85.00	£3.00	3.7%
Environment	Public Protection (Pest Control)	Pest Control - Wasps additional nest at same time	additional nest	£22.00	£23.00	£1.00	4.5%
Environment	Public Protection (Pest Control)	Pest Control - Wasps - concessionary price	per visit	£50.00	£52.00	£2.00	4.0%
Environment	Public Protection (Pest Control)	Pest Control - Wasps -additional nest at same time concessionary price	additional nest	£14.00	£15.00	£1.00	7.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Pest Control)	Pest Control - Cluster flies including 2 loft spaces	2 loft spaces	£140.00	£145.00	£5.00	3.6%
Environment	Public Protection (Pest Control)	Pest Control - Cluster flies - each additional loft	additional loft	£35.00	£36.00	£1.00	2.9%
Environment	Public Protection (Pest Control)	Pest Control - Cluster flies including 2 loft spaces - concessionary price	2 loft spaces	£90.00	£95.00	£5.00	5.6%
Environment	Public Protection (Pest Control)	Pest Control - Cluster flies - each additional loft- concessionary price	additional loft	£20.00	£21.00	£1.00	5.0%
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 1 bedroom	1 bedroom	£0.00	£112.00	£112.00	
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 1 bedroom - concessionary price	1 bedroom	£0.00	£75.00	£75.00	
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 2 bedrooms	2 bedrooms	£142.00	£145.00	£3.00	2.1%
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 2 bedrooms - concessionary price	2 bedrooms	£100.00	£100.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 3 bedrooms	3 bedrooms	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Pest Control)	Pest Control - Fleas up to 3 bedrooms - concessionary price	3 bedrooms	£103.00	£120.00	£17.00	16.5%
<del>- [ŋ</del> vironment	Public Protection (Pest Control)	Pest Control - Fleas up to 4 bedrooms	4 bedrooms	£185.00	£190.00	£5.00	2.7%
<b>D</b> ivironment	Public Protection (Pest Control)	Pest Control - Fleas up to 4 bedrooms - concessionary price	4 bedrooms	£117.00	£140.00	£23.00	19.7%
(D) vironment	Public Protection (Pest Control)	Pest Control - Fleas over 5 bedrooms price on application	5 bedrooms	price on application	POA	£0.00	
Environment	Public Protection (Pest Control)	Pest Control - Follow up Flea Treatment up to 2 bedrooms	2 bedrooms	£71.00	£0.00	-£71.00	-100.0%
Environment	Public Protection (Pest Control)	Pest Control - Follow up Flea Treatment up to 3 bedrooms	3 bedrooms	£82.50	£0.00	-£82.50	-100.0%
Environment	Public Protection (Pest Control)	Pest Control - Follow up Flea Treatment up to 4 bedrooms	4 bedrooms	£92.50	£0.00	-£92.50	-100.0%
Environment	Public Protection (Pest Control)	Pest Control - Follow up Flea Treatment over 5 bedrooms price on application	5 bedrooms	price on application	£112.00	£0.00	
Environment	Public Protection (Pest Control)	Pest Control - Carpet moths 1 bedrooms	1 bedroom	£0.00	£75.00	£75.00	
Environment	Public Protection (Pest Control)	Pest Control - Carpet moths 2 bedrooms	2 bedrooms	£142.00	£145.00	£3.00	2.1%
Environment	Public Protection (Pest Control)	Pest Control - Carpet moths 2 bedrooms- concessionary price	2 bedrooms	£85.00	£100.00	£15.00	17.6%
Environment	Public Protection (Pest Control)	Pest Control - Carpet Moths up to 3 bedrooms	3 bedrooms	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Pest Control)	Pest Control - Carpet Moths up to 3 bedrooms - concessionary price	3 bedrooms	£103.00	£120.00	£17.00	16.5%
Environment	Public Protection (Pest Control)	Pest Control - Carpet Moths 4 bedrooms	4 bedrooms	£185.00	£190.00	£5.00	2.7%
Environment	Public Protection (Pest Control)	Pest Control - Carpet Moths up to 4 bedrooms - concessionary price	4 bedrooms	£117.00	£140.00	£23.00	19.7%
Environment	Public Protection (Pest Control)	Pest Control - Carpet Moths over 5 bedrooms price on application	5 bedrooms	price on application	POA	£0.00	
Environment	Public Protection (Pest Control)	Pest Control - Ants up to 3 bedrooms	3 bedrooms	£165.00	£170.00	£5.00	3.0%
Environment	Public Protection (Pest Control)	Pest Control - Ants up to 3 bedrooms - concessionary price	3 bedrooms	£103.00	£105.00	£2.00	1.9%
Environment	Public Protection (Pest Control)	Pest Control - Ants - each additional bedroom	additional bedroom	£35.00	£36.00	£1.00	2.9%
Environment	Public Protection (Pest Control)	Pest Control - Mink and rabbits - per hour	per hour	£115.00	£118.00	£3.00	2.6%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment			T				
Environment	Public Protection (Pest Control)	Pest Control - Squirrel Trapping (max. of 2 weeks treatment) customer to check trap	per treatment	£175.00	£180.00	£5.00	2.9%
Environment	Public Protection (Pest Control)	Pest Control - Squirrels (max. of 2 weeks treatment) - customer to check trap concessionary price	per treatment	£112.00	£115.00	£3.00	2.7%
Environment	Public Protection (Pest Control)	Pest Control - Squirrels per hour min 2 hours (where pest control checks the traps)	per hour	£115.00	£118.00	£3.00	2.6%
Environment	Public Protection (Pest Control)	Pest Control - Squirrels per hour min 2 hours (where pest control checks the traps) - concessionary price	per hour	£80.00	£82.00	£2.00	2.5%
Environment	Public Protection (Pest Control)	Pest Control - Cockroaches (2 visits)	2 visits	£340.00	£350.00	£10.00	2.9%
Environment	Public Protection (Pest Control)	Pest Control - Cockroaches (2 visits) - concessionary price	2 visits	£215.00	£220.00	£5.00	2.3%
vironment	Public Protection (Pest Control)	Pest Control - Cockroaches (additional visit)	additional visit	£145.00	£150.00	£5.00	3.4%
nvironment	Public Protection (Pest Control)	Pest Control - Cockroaches (additional visit) - concessionary price	additional visit	£85.00	£87.00	£2.00	2.4%
nvironment	Public Protection (Pest Control)	Pest Control - Bedbugs 1 Bedroom House	1 bedroom	£340.00	£350.00	£10.00	2.9%
vironment	Public Protection (Pest Control)	Pest Control - Bedbugs 1 Bedroom House - concessionary price	1 bedroom	£215.00	£220.00	£5.00	2.3%
vironment	Public Protection (Pest Control)	Pest Control - Bedbugs each additional bedroom	additional bedroom	£145.00	£150.00	£5.00	3.4%
Environment	Public Protection (Pest Control)	Pest Control - Bedbugs each additional bedroom - concessionary price	additional bedroom	£85.00	£87.00	£2.00	2.4%
Environment	Public Protection (Pest Control)	Pest Control - Bedbug survey fee	per survey	£86.00	£88.00	£2.00	2.3%
Environment	Public Protection (Pest Control)	Pest Control - Bedbug survey fee - concessionary price	per survey	£58.00	£60.00	£2.00	3.4%
Environment	Public Protection (Pest Control)	Pest Control - Advice visit fee if no treatment necessary	per advice	£48.00	£49.00	£1.00	2.1%
Environment	Public Protection (Pest Control)	Pest Control - Drain smoke test only as part of pest treatment	per test	£56.00	£57.00	£1.00	1.8%
Environment	Public Protection (Pest Control)	Pest Control - Drain CCTV survey only as part of pest treatment	per test	£160.00	£164.00	£4.00	2.5%
Environment	Public Protection (Pest Control)	Pest Control - Drain CCTV survey concessionary price	per test	£103.00	£105.00	£2.00	1.9%
Environment	Public Protection (Pest Control)	Pest Control - Visits where no material used	per visit	£75.00	£77.00	£2.00	2.7%
Environment	Public Protection (Pest Control)	Pest Control - End of tenancy/house purchase inspection	per inspection	£65.00	£66.00	£1.00	1.5%
Environment	Public Protection (Pest Control)	Pest Control - Moles (max. of 2 weeks treatment) customer to check trap	per treatment	£175.00	£180.00	£5.00	2.9%
Environment	Public Protection (Pest Control)	Pest Control - Moles (max. of 2 weeks treatment) - customer to check trap concessionary price	per treatment	£112.00	£114.00	£2.00	1.8%
Environment	Public Protection (Pest Control)	Pest Control - Moles per hour min 2 hours (where pest control check the traps)	per hour	£115.00	£118.00	£3.00	2.6%
Environment	Public Protection (Pest Control)	Pest Control - Rodents per hour (External or both Internal & External)	per hour	£115.00	£117.00	£2.00	1.7%
Environment	Public Protection (Pest Control)	Pest Control - Squirrels per hour	per hour	£115.00	£117.00	£2.00	1.7%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day	Approved charges	2025/26 Proposed	Increase /	Increase /
Directorate	Scruice	bescription of recyclidige	etc)	2024/25	charge	(Decrease)	(Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Pest Control)	Pest Control - Wasps - advance payment	per payment	£80.00	£82.00	£2.00	2.5%
Environment	Public Protection (Pest Control)	Pest Control - Wasps invoiced	per invoice	£128.00	£128.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Multiple wasp nest in same visit	per visit	£20.00	£20.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Bedbugs / cockroaches per hour	per hour	£115.00	£117.00	£2.00	1.7%
Environment	Public Protection (Pest Control)	Pest Control - Insects per hour	per hour	£115.00	£117.00	£2.00	1.7%
Environment	Public Protection (Pest Control)	Pest Control - Call out fee if no treatment necessary	call out	£60.00	£0.00	-£60.00	-100.0%
Environment	Public Protection (Pest Control)	Pest Control - Contract rate	per contract	£110.00	£113.00	£3.00	2.7%
Environment	Public Protection (Pest Control)	Pest Control - Invoice fee if not commercial	per invoice	£48.00	£50.00	£2.00	4.2%
Environment	Public Protection (Pest Control)	Pest Control - EFK Servicing with sticky traps & Bulbs	per service	£57.00	£59.00	£2.00	3.5%
Environment	Public Protection (Pest Control)	Pest Control - EFK Servicing with bulbs	per service	£46.00	£48.00	£2.00	4.3%
Environment	Public Protection (Pest Control)	Pest Control - EFK Servicing no materials	per service	£40.00	£41.00	£1.00	2.5%
<b>Ho</b> vironment	Public Protection (Pest Control)	Pest Control - EFK Servicing as a Contract Visit Sticky Traps & Bulbs	per service	£50.00	£52.00	£2.00	4.0%
hvironment	Public Protection (Pest Control)	Pest Control - EFK Servicing as a Contract Visit Sticky Traps	per service	£36.00	£37.00	£1.00	2.8%
nvironment	Public Protection (Pest Control)	Pest Control - EFK Servicing as a contract visit no materials	per service	£25.00	£26.00	£1.00	4.0%
Environment	Public Protection (Pest Control)	Pest Control - Wasp trap (during treatment)	per trap	£20.00	£20.00	£0.00	0.0%
<b>P</b> vironment	Public Protection (Pest Control)	Pest Control - Wasp trap (with survey fee)	per trap	£58.00	£60.00	£2.00	3.4%
Privironment	Public Protection (Pest Control)	Pest Control - Drain stopper 4 inch (100mm)	per item	£28.00	£29.00	£1.00	3.6%
Environment	Public Protection (Pest Control)	Pest Control - Drain stopper 4 inch (100mm) fitted	per item	£74.00	£76.00	£2.00	2.7%
Environment	Public Protection (Pest Control)	Pest Control - Drain stopper 6 inch (150 mm)	per item	£36.00	£37.00	£1.00	2.8%
Environment	Public Protection (Pest Control)	Pest Control - Drain stopper 6 inch (150 mm) fitted	per item	£82.00	£84.00	£2.00	2.4%
Environment	Public Protection (Pest Control)	Pest Control - Rat Wall 4 inch fitted	per item	£210.00	£210.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Rat Wall 6 inch fitted	per item	£260.00	£260.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Moth trap - Diamond	per item	£6.00	£6.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Moth trap - Blk & white	per item	£7.00	£7.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Odour Counteractant	per item	£9.00	£9.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - Insect identification	per item	£28.00	£29.00	£1.00	3.6%
Environment	Public Protection (Pest Control)	Pest Control - bed bug moats	per item	£30.00	£30.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - sealing around pipes (with a treatment)	per item	£38.00	£39.00	£1.00	2.6%
Environment	Public Protection (Pest Control)	Pest Control - air vents small Plastic	per item	£32.00	£32.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - air vents Small stainless steel	per item	£40.00	£41.00	£1.00	2.5%
Environment	Public Protection (Pest Control)	Pest Control - air vents medium Plastic	per item	£35.00	£35.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Pest Control - air vents medium stainless steel	per item	£43.00	£45.00	£2.00	4.7%
Environment	Public Protection (Pest Control)	Pest Control - air vents large Plastic	per item	£39.00	£39.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment							
Environment	Public Protection (Pest Control)	Pest Control - air vents large stainless steel	per item	£48.00	£50.00	£2.00	4.2%
Environment	Public Protection (Pest Control)	Pest Control - Mole trap pack	per item	£80.00	£82.00	£2.00	2.5%
Environment	Public Protection (Pest Control)	Pest Control - Electric Fly Killer (EFK) White (Exc. fitting)	per item	£210.00	£220.00	£10.00	4.8%
Environment	Public Protection (Pest Control)	Pest Control - Electric fly Killer (EFK) Silver (Exc. fitting)	per item	£240.00	£250.00	£10.00	4.2%
Environment	Public Protection (Pest Control)	Pest Control - Electric Fly Killer (EFK) Cluster Flies White (Exc. fitting)	per item	£230.00	£240.00	£10.00	4.3%
Environment	Public Protection (Pest Control)	Pest Control - Redtop fly trap	per item	£22.00	£22.00	£0.00	0.0%
Environment	Public Protection (Pest Control)	Electric Fly Killer (EFK) LED White (Exc. Fitting) NEW	per item	£350.00	£425.00	£75.00	21.4%
Environment	Public Protection (ASB)	Anti-Social Behaviour - Charge for closure orders under the Anti- social Behaviour, Crime and Policing Act 2014	per order	£450.00	£465.00	£15.00	3.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment	Public Protection (Env. Control)	PRIVATE WATER SUPPLIES					
Environment	Public Protection (Env. Control)	Single domestic sampling cost *	per item	£127.00	£130.00	£3.00	2.4%
Environment	Public Protection (Env. Control)	Single domestic risk assessment*	per item	£195.00	£199.00	£4.00	2.1%
Environment	Public Protection (Env. Control)	Single domestic Investigation*	per item	£155.00	£158.00	£3.00	1.9%
Environment	Public Protection (Env. Control)	Single domestic authorised departure	per item	£127.00	£130.00	£3.00	2.4%
Environment	Public Protection (Env. Control)	<10 m3/day residential risk assessment	per item	£360.00	£368.00	£8.00	2.2%
Environment	Public Protection (Env. Control)	<10 m3/day residential risk assessment with safer water pack completed self assessment	per item	£260.00	£266.00	£6.00	2.3%
Environment	Public Protection (Env. Control)	<10 m3/day residential sampling cost (plus actual analysis cost)	per item	£135.00	£138.00	£3.00	2.2%
Environment	Public Protection (Env. Control)	<10 m3/day residential investigation	per item	£155.00	£158.00	£3.00	1.9%
Environment	Public Protection (Env. Control)	<10 m3/day residential authorised departure *	per item	£118.00	£121.00	£3.00	2.5%
Environment	Public Protection (Env. Control)	<10 m3/day commercial risk assessment	per item	£360.00	£368.00	£8.00	2.2%
vironment	Public Protection (Env. Control)	<10 m3/day commercial risk assessment with safer water pack completed self assessment	per item	£260.00	£266.00	£6.00	2.3%
<b>P</b> ivironment	Public Protection (Env. Control)	<10 m3/day commercial sampling cost incl collection cost	per item	£136.00	£139.00	£3.00	2.2%
Pnvironment	Public Protection (Env. Control)	<10 m3/day commercial investigation	per item	£162.00	£166.00	£4.00	2.5%
invironment	Public Protection (Env. Control)	<10 m3/day commercial authorised departure	per item	£155.00	£158.00	£3.00	1.9%
vironment	Public Protection (Env. Control)	10 - 100 m3/day sampling cost (plus actual analysis cost)	per item	£136.00	£139.00	£3.00	2.2%
Environment	Public Protection (Env. Control)	10 - 100 m3/day risk assessment	per item	£450.00	£460.00	£10.00	2.2%
Environment	Public Protection (Env. Control)	10 - 100 m3/day risk assessment with safer water pack completed self assessment	per item	£350.00	£358.00	£8.00	2.3%
Environment	Public Protection (Env. Control)	10 - 100 m3/day investigation*	per item	£185.00	£189.00	£4.00	2.2%
Environment	Public Protection (Env. Control)	10 - 100 m3/day authorised departure*	per item	£185.00	£189.00	£4.00	2.2%
Environment	Public Protection (Env. Control)	100 - 1000 m3/day sampling cost (plus actual analysis cost)	per item	£155.00	£158.00	£3.00	1.9%
Environment	Public Protection (Env. Control)	100 - 1000 m3/day risk assessment	per item	£510.00	£521.00	£11.00	2.2%
Environment	Public Protection (Env. Control)	100 - 1000 m3/day risk assessment with safer water pack completed self assessment	per item	£410.00	£419.00	£9.00	2.2%
Environment	Public Protection (Env. Control)	100 - 1000 m3/day investigation*	per item	£260.00	£266.00	£6.00	2.3%
Environment	Public Protection (Env. Control)	100 - 1000 m3/day authorised departure*	per item	£185.00	£189.00	£4.00	2.2%
Environment	Public Protection (Env. Control)	Private water distribution networks risk assessments	per item	£510.00	£521.00	£11.00	2.2%
Environment	Public Protection (Env. Control)	Private water distribution networks risk assessments with safer water pack completed self assessment	per item	£410.00	£419.00	£9.00	2.2%
Environment	Public Protection (Env. Control)	Council safer water publication	per item	£127.00	£130.00	£3.00	2.4%
Environment	Public Protection (Env. Control)	Risk Assessment via questionnaire	per item	£106.00	£108.00	£2.00	1.9%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment	Public Protection (Env. Control)	* Actual costs means the cost of the laboratory analysis as charged to Wiltshire Council.	per item	*see description		£0.00	
Environment	Waste	Waste Services - Green Waste collection charge	per bin	£70.00	£75.00	£5.00	7.1%
Environment	Waste	Waste Services -Food Waste Digesters	per bin	£68.00	£70.00	£2.00	2.9%
Environment	Waste	Waste Services - VCSE household recycling centre permit 6 visits	6 visits	£67.00	£68.00	£1.00	1.5%
Environment	Waste	Waste Services - VCSE household recycling centre permit 12 visits	12 visits	£107.00	£107.00	£0.00	0.0%
Environment	Waste	Section 106 Waste Container Contribution (SPD) - per Household	per household	£110.00	£115.00	£5.00	4.5%
Environment	Waste	Section 106 Waste Container Contribution (SPD) - Flats 1-5 per apartment	Flats 1-5 per apartment	£110.00	£115.00	£5.00	4.5%
Environment	Waste	Section 106 Waste Container Contribution (SPD) - Flats 6-10 per bin store	Flats 6-10 per bin store	£887.00	£923.00	£36.00	4.1%
nvironment	Waste	Section 106 Waste Container Contribution (SPD) - Flats 11-14 per bin store	Flats 11-14 per bin store	£1,685.00	£1,752.00	£67.00	4.0%
<b>P</b> hvironment	Waste	Section 106 Waste Container Contribution (SPD) - Flats 15-18 per bin store	Flats 15-18 per bin store	£2,482.00	£2,582.00	£100.00	4.0%
nvironment	Waste	Household Recycling Centre permit for van and trailer	Per permit	£20.00	£20.00	£0.00	0.0%
vironment	Waste	Waste Management - Bulky Waste collection	per item	£32.00	£33.00	£1.00	3.1%
Environment	Natural & Historic Environment	Ecology Discretionary Advice Service. This service can provide more specialist technical advice on ecological matters. This could include advice and verification on strategic biodiversity net gain and nutrient neutrality sites as well as wider nature recovery initiatives.	Per hour	£61.00	£62.50	£1.50	2.5%
Environment	Natural & Historic Environment	Enhanced pre-application advice - The service can include a).  Commenting on a draft Ecology Report to ensure that all ecology issues have been dealt with effectively prior to the application being submitted. b). Advice on specific issues e.g. protected sites or species (including survey requirements / HRA related issues), biodiversity net gain and nutrient neutrality. We strongly advise that developers buy into this service as it will avoid any potential costly delays when the application is submitted.	Per hour	£61.00	£62.50	£1.50	2.5%
Environment	Natural & Historic Environment	Ecology Monitoring of habitat and mitigation delivery and tracking of capacity of strategic schemes. This service can provide monitoring of mitigation delivery and biodiversity net gain projects for the duration of the scheme. For strategic projects that offer environmental mitigation for multiple developments, the service can track scheme capacity of nutrient credits and biodiversity net gain units.	Per hour	£61.00	£62.50	£1.50	2.5%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PLACE							
Environment	Natural & Historic Environment	Ecology Screening Visit (pre-application) - Householder or smaller development proposals only. This service can help identify whether protected habitats or species are likely to be affected by the proposed works. If there is evidence or potential for protected species, or a priority habitat is present additional independent ecological evidence will need to be commissioned, and appropriate mitigation designed in order that the proposed works can go ahead without adverse impacts to ecology. Note that this would require the services of an independent ecologist and is not a service offered by Wiltshire Council.	Per Day (excl. travelling costs) additional time charged at hourly rate	£450.00	£460.00	£10.00	2.2%
Environment	Natural & Historic Environment	Nitrogen Credits	Per 1kg/N	£2,730.00	£2,790.00	£60.00	2.2%
Environment	Natural & Historic Environment	Nitrogen Credits (Development outside Wiltshire)	Per 1kg/N		£3,250.00	New	
မြှေvironment ယ (C	Natural & Historic Environment	Phosphorus credits for Council-led mitigation in the River Avon (Special Area of Conservation) catchment	Per 1kg/TP	£38,500 plus 5% administration fee	£42,500 plus 5% administration fee	£4,000.00	10%
Environment	Natural & Historic Environment	North Meadow Inner Zone	Per dwelling	£323.00	£331.75	£8.75	2.7%
Nironment	Natural & Historic Environment	North Meadow Outer Zone	Per dwelling	£803.00	£811.75	£8.75	1.1%
Environment	Natural & Historic Environment	New Forest Recreation Disturbance SAMM payment	Per dwelling	£600.00	£612.00	£12.00	2.0%
Environment	Natural & Historic Environment	Trowbridge Bat Mitigation Strategy - inner yellow zone (habitat creation)	Per dwelling	£777.62	£972.00	£194.38	25.0%
Environment	Natural & Historic Environment	Council-owned Biodiversity Net Gain habitat units	per unit		£25000 plus 10% administration fee	New	
Environment	Natural & Historic Environment	Council-owned Biodiversity Net Gain hedgerow units	per unit		£15000 plus 10% administration fee	New	
Environment	Natural & Historic Environment	Biodiversity Net Gain On-site 30 year Monitoring Fee (non-phased development) Major applications	Per Habitat  Management and  Monitoring Plan		£11,165.00	New	

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
PLACE				£	£	£	%
TEACE			Per Habitat				
Environment	Natural & Historic Environment	Biodiversity Net Gain On-site 30 year Monitoring Fee (non-phased	Management and		£5,815.00	New	
		development) Minor applications	Monitoring Plan				
Environment	Natural & Historic Environment	Archaeology: discretionary advice and outreach activities eg giving talks	Per hour	£61.00	£62.00	£1.00	1.6%
Environment	Natural & Historic Environment	Archaeology: for a commercial Historic Environment Record (HER) enquiry	Per enquiry	£130.00	£133.00	£3.00	2.3%
Environment	Natural & Historic Environment	New Forest Recreation Disturbance SAMM payment	Per dwelling	£600.00	£612.00	£12	2.0%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	T	T., .,		21.05	00	20.05	1.00/
Leisure, Culture & Communities	Heritage	Heritage - Photocopies A3 black & white	per item	£1.05	£1.10	£0.05	4.8%
Leisure, Culture & Communities	Heritage	Heritage - Photocopies A4 black & white	per item	£0.75	£0.80	£0.05	6.7%
Leisure, Culture & Communities	Heritage	Heritage - Photocopies A3 colour	per item	£2.10	£2.20	£0.10	4.8%
Leisure, Culture & Communities	Heritage	Heritage - Photocopies A4 colour	per item	£1.40	£1.50	£0.10	7.1%
Leisure, Culture & Communities	Heritage	Heritage - Computer screen prints colour	per item	£1.05	£1.10	£0.05	4.8%
Leisure, Culture & Communities	Heritage	Heritage - Prints from Microforms A4	per item	£1.30	£1.50	£0.20	15.4%
Leisure, Culture & Communities	Heritage	Heritage - Prints from Microforms A3	per item	£1.85	£2.00	£0.15	8.1%
Leisure, Culture & Communities	Heritage	Heritage - Photographs - 1 digital image emailed	per item	£8.50	£9.50	£1.00	11.8%
Leisure, Culture & Communities	Heritage	Heritage - Reproduction Fee minimum by negotiation	per fee	£55.00	£100.00	£45.00	81.8%
Leisure, Culture & Communities	Heritage	Heritage - UK and World rights, minimum by negotiation	per negotiation	£110.00	£200.00	£90.00	81.8%
Leisure, Culture & Communities	Heritage	Heritage - Archive certificates - Baptisms	per certificate	£17.00	£18.00	£1.00	5.9%
Leisure, Culture & Communities	Heritage	Heritage - Research Fee - 1/2 hour	per 1/2 hour	£18.00	£19.00	£1.00	5.6%
Te sure, Culture & Communities	Heritage	Heritage - Research Fee - hour	per hour	£36.00	£38.00	£2.00	5.6%
isure, Culture & Communities	Heritage	Heritage - photography by customers daily fee	per licence	£9.00	£9.00	£0.00	0.0%
isure, Culture & Communities	Heritage	Heritage - photography by customers weekly fee	per licence	£37.00	£37.00	£0.00	0.0%
kejsure, Culture & Communities	Heritage	Heritage - photography by customers annual	per licence	£105.00	£105.00	£0.00	0.0%
sure, Culture & Communities	Heritage	Heritage - Minimum charge for sending items by post / email	per item	£8.50	£0.00	-£8.50	-100.0%
Leisure, Culture & Communities	Libraries	Overdue fine - adult	per item, per day	£0.21	£0.22	£0.01	4.8%
Leisure, Culture & Communities	Libraries	Overdue fine - child	per item, per day	£0.00	£0.00	£0.00	
Leisure, Culture & Communities	Libraries	Reservation charge	per item	£1.00	£1.00	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Reservation charge - reading groups	per set	£2.00	£2.00	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Reservation charge - out of county	per item	£7.00	£7.00	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Talking books	per item	£1.90	£1.90	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Language courses	per item	£3.20	£3.20	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Replacement library cards - adult	per item	£1.70	£2.00	£0.30	17.6%
Leisure, Culture & Communities	Libraries	Replacement library cards - child	per item	£0.80	£1.00	£0.20	25.0%
Leisure, Culture & Communities	Libraries	Printing / Photocopying B & W A4 / A3	per sheet	£0.15	£0.15	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Printing colour A4	per sheet	£1.00	£1.00	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Performing Arts - Orchestral sets	per set	£32.00	£32.00	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Performing Arts - Vocal scores	per score	£1.25	£1.25	£0.00	0.0%
Leisure, Culture & Communities	Libraries	Performing Arts - Play sets	per set	£9.00	£10.00	£1.00	11.1%
Leisure, Culture & Communities	Leisure	Admin Fee for all DD memberships, inc. Corporate, Swim and Gym School (NOT Active Health)	Per application	£25.00	£25.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Swim School - 30min class per week (Monthly DD)	Adult or Junior	£31.25	£32.50	£1.25	4.0%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Concession	£22.50	£23.75	£1.25	5.6%
Leisure, Culture & Communities	Leisure	Swim School - 45min class per week (Monthly DD)	Adult or Junior	£38.75	£40.00	£1.25	3.2%
Leisure, Culture & Communities	Leisure		Concession	£33.75	£35.00	£1.25	3.7%
Leisure, Culture & Communities	Leisure	Swim School - 1hr class per week (Monthly DD)	Adult or Junior	£50.00	£51.25	£1.25	2.5%
Leisure, Culture & Communities	Leisure		Concession	£37.50	£38.75	£1.25	3.3%
Leisure, Culture & Communities	Leisure	Swim School - 90min class per week (Monthly DD)	Adult or Junior	£55.00	£56.25	£1.25	2.3%
Leisure, Culture & Communities	Leisure		Concession	£40.00	£41.25	£1.25	3.1%
Leisure, Culture & Communities	Leisure	Gym School - 30 min class per week (Monthly DD)	Adult or Junior	£23.75	£25.00	£1.25	5.3%
Leisure, Culture & Communities	Leisure		Concession	£17.50	£18.75	£1.25	7.1%
Leisure, Culture & Communities	Leisure	Gym School - 45 min class per week (Monthly DD)	Adult or Junior	£26.25	£27.50	£1.25	4.8%
Leisure, Culture & Communities	Leisure		Concession	£18.75	£20.00	£1.25	6.7%
<del>Le</del> isure, Culture & Communities	Leisure	Gym School - 1 hr class per week (Monthly DD)	Adult or Junior	£30.00	£31.25	£1.25	4.2%
<b>D</b> eisure, Culture & Communities	Leisure		Concession	£22.50	£23.75	£1.25	5.6%
isure, Culture & Communities	Leisure	Advanced Gym School - 2 hr class per week (Monthly DD)	Adult or Junior	£52.50	£55.00	£2.50	4.8%
Leisure, Culture & Communities	Leisure		Concession	£40.00	£42.50	£2.50	6.3%
sure, Culture & Communities	Leisure	Advanced Gym School - 4 hr class per week (Monthly DD)	Adult or Junior	£75.00	£80.00	£5.00	6.7%
isure, Culture & Communities	Leisure		Concession	£60.00	£65.00	£5.00	8.3%
Leisure, Culture & Communities	Leisure	Advanced Gym School - 6 hrs per week (Monthly DD)	Adult or Junior	£92.50	£100.00	£7.50	8.1%
Leisure, Culture & Communities	Leisure		Concession	£70.00	£77.50	£7.50	10.7%
Leisure, Culture & Communities	Leisure	Trampoline School - 1 hr class per week (Monthly DD)	Adult or Junior	£30.00	£31.25	£1.25	4.2%
Leisure, Culture & Communities	Leisure		Concession	£22.50	£23.75	£1.25	5.6%
Leisure, Culture & Communities	Leisure	Lev water - 30min class per week (Monthly DD)	Adult or Junior	£30.00	£31.25	£1.25	4.2%
Leisure, Culture & Communities	Leisure		Concession	£22.50	£23.75	£1.25	5.6%
Leisure, Culture & Communities	Leisure	121 - 30min class per week (Monthly DD)	Adult or Junior	£80.00	£81.25	£1.25	1.6%
Leisure, Culture & Communities	Leisure		Concession	£61.25	£62.50	£1.25	2.0%
Leisure, Culture & Communities	Leisure	122 - 30min class per week (Monthly DD)	Adult or Junior	£106.25	£107.50	£1.25	1.2%
Leisure, Culture & Communities	Leisure		Concession	£81.25	£82.50	£1.25	1.5%
Leisure, Culture & Communities	Leisure	121 - 30min class every other week (Monthly DD)	Adult or Junior	£47.50	£48.75	£1.25	2.6%
Leisure, Culture & Communities	Leisure		Concession	£35.00	£36.25	£1.25	3.6%
Leisure, Culture & Communities	Leisure	121 Add needs - 30min class per week (Monthly DD)	Adult or Junior	£60.00	£61.25	£1.25	2.1%
Leisure, Culture & Communities	Leisure	Life Zone (12 month) (Monthly DD)	Senior	£28.30	£29.80	£1.50	5.3%
Leisure, Culture & Communities	Leisure		Concession	£28.30	£28.70	£0.40	1.4%
Leisure, Culture & Communities	Leisure		Adult	£39.95	£41.00	£1.05	2.6%
Leisure, Culture & Communities	Leisure		Adult Add on	£32.05	£34.50	£2.45	7.6%
Leisure, Culture & Communities	Leisure	Fitness Zone (12 month) (Monthly DD)	Senior	£24.00	£25.50	£1.50	6.3%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Concession	£24.00	£24.50	£0.50	2.1%
Leisure, Culture & Communities	Leisure		Adult	£34.00	£35.00	£1.00	2.9%
Leisure, Culture & Communities	Leisure		Adult Add on	£27.20	£29.70	£2.50	9.2%
Leisure, Culture & Communities	Leisure	Swim Zone (12 month) (Monthly DD)	Senior	£18.00	£19.00	£1.00	5.6%
Leisure, Culture & Communities	Leisure		Concession	£18.00	£18.90	£0.90	5.0%
Leisure, Culture & Communities	Leisure		Adult	£26.00	£27.00	£1.00	3.8%
Leisure, Culture & Communities	Leisure		Adult Add on	£21.00	£23.00	£2.00	9.5%
Leisure, Culture & Communities	Leisure	Racket Zone (12 month) (Monthly DD)	Senior	£24.00	£25.50	£1.50	6.3%
Leisure, Culture & Communities	Leisure		Concession	£24.00	£24.50	£0.50	2.1%
Leisure, Culture & Communities	Leisure		Adult	£34.00	£35.00	£1.00	2.9%
Leisure, Culture & Communities	Leisure		Adult Add on	£27.20	£29.70	£2.50	9.2%
Leisure, Culture & Communities	Leisure		Bolt on (no longer on sale - existing customers only)	£10.00	£11.00	£1.00	10.0%
හ ල ල්isure, Culture & Communities N	Leisure	Junior Zone (3-10) (Flexible) (Monthly DD)	Parents members (no longer on sale - existing customers only)	£15.00	£16.00	£1.00	6.7%
Risure, Culture & Communities	Leisure		N/A	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure	Junior Zone (11-13) (Flexible) (Monthly DD)	Parents members (no longer on sale - existing customers only)	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure		Parents Non- members	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure	Junior Zone (14-15) (Flexible) (Monthly DD)	Parents members (no longer on sale - existing customers only)	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure		Parents Non- members	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure	Life Zone (Flexible) (Monthly DD)	Senior	£32.60	£34.00	£1.40	4.3%
Leisure, Culture & Communities	Leisure		Concession	£32.60	£33.00	£0.40	1.2%
Leisure, Culture & Communities	Leisure		Adult	£45.95	£47.00	£1.05	2.3%
Leisure, Culture & Communities	Leisure		Adult Add on	£37.15	£40.00	£2.85	7.7%
Leisure, Culture & Communities	Leisure		Young adult	£20.00	£21.00	£1.00	5.0%
Leisure, Culture & Communities	Leisure	Fitness Zone (Flexible) (Monthly DD)	Senior	£27.50	£29.00	£1.50	5.5%
Leisure, Culture & Communities	Leisure		Concession	£27.50	£28.00	£0.50	1.8%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Adult	£39.00	£40.00	£1.00	2.6%
Leisure, Culture & Communities	Leisure		Adult Add on	£31.20	£34.00	£2.80	9.0%
Leisure, Culture & Communities	Leisure	Swim Zone (Flexible) (Monthly DD)	Senior	£21.00	£22.50	£1.50	7.1%
Leisure, Culture & Communities	Leisure		Concession	£21.00	£21.70	£0.70	3.3%
Leisure, Culture & Communities	Leisure		Adult	£30.00	£31.00	£1.00	3.3%
Leisure, Culture & Communities	Leisure		Adult Add on	£24.00	£26.00	£2.00	8.3%
Leisure, Culture & Communities	Leisure	Racket Zone (Flexible) (Monthly DD)	Senior	£27.50	£29.00	£1.50	5.5%
Leisure, Culture & Communities	Leisure		Concession	£27.50	£28.00	£0.50	1.8%
Leisure, Culture & Communities	Leisure		Adult	£39.00	£40.00	£1.00	2.6%
Leisure, Culture & Communities	Leisure		Adult Add on	£31.20	£34.00	£2.80	9.0%
Leisure, Culture & Communities	Leisure	Active Health Referral (Monthly DD)	Life Zone	£28.30	£28.70	£0.40	1.4%
<del>Le</del> isure, Culture & Communities	Leisure		Fitness Zone	£24.00	£24.50	£0.50	2.1%
<b>D</b> eisure, Culture & Communities	Leisure		Swim Zone	£18.00	£18.90	£0.90	5.0%
isure, Culture & Communities	Leisure	Life Zone (Corporate) (Monthly DD)	Adult	£32.00	£34.50	£2.50	7.8%
Leisure, Culture & Communities	Leisure	Fitness Zone (Corporate) (Monthly DD)	Adult	£28.90	£29.70	£0.80	2.8%
sure, Culture & Communities	Leisure	Swim Zone (Corporate) (Monthly DD)	Adult	£21.00	£23.00	£2.00	9.5%
Naisure, Culture & Communities	Leisure	Life Zone (Annual - one off payment)	Senior	£311.30	£327.80	£16.50	5.3%
Leisure, Culture & Communities	Leisure		Concession	£311.30	£315.70	£4.40	1.4%
Leisure, Culture & Communities	Leisure		Adult	£439.45	£451.00	£11.55	2.6%
Leisure, Culture & Communities	Leisure		Adult Add on	£352.55	£379.50	£26.95	7.6%
Leisure, Culture & Communities	Leisure		Corporate	£352.00	£379.50	£27.50	7.8%
Leisure, Culture & Communities	Leisure		Student	£30.00	£31.00	£1.00	3.3%
Leisure, Culture & Communities	Leisure			£50.00	£52.00	£2.00	4.0%
Leisure, Culture & Communities	Leisure	Fitness Zone (Annual - one off payment)	Senior	£264.00	£280.50	£16.50	6.3%
Leisure, Culture & Communities	Leisure		Concession	£264.00	£269.50	£5.50	2.1%
Leisure, Culture & Communities	Leisure		Adult	£374.00	£385.00	£11.00	2.9%
Leisure, Culture & Communities	Leisure		Adult Add on	£299.20	£326.70	£27.50	9.2%
Leisure, Culture & Communities	Leisure		Corporate	£317.90	£326.70	£8.80	2.8%
Leisure, Culture & Communities	Leisure		2-week	£26.00	£27.00	£1.00	3.8%
Leisure, Culture & Communities	Leisure		Monthly	£48.00	£49.00	£1.00	2.1%
Leisure, Culture & Communities	Leisure		3 Monthly (Summer)	£125.00	£130.00	£5.00	4.0%
Leisure, Culture & Communities	Leisure	Swim Zone (Annual - one off payment)	Senior	£198.00	£209.00	£11.00	5.6%
Leisure, Culture & Communities	Leisure		Concession	£198.00	£207.90	£9.90	5.0%
Leisure, Culture & Communities	Leisure		Adult	£286.00	£297.00	£11.00	3.8%
Leisure, Culture & Communities	Leisure		Adult Add on	£231.00	£253.00	£22.00	9.5%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
Laisura Cultura 9 Cammunitias	Loisuro		Carnarata	_		£ (22.00	
Leisure, Culture & Communities	Leisure	Dealer Zene (Assessed Leave of Consumerat)	Corporate	£231.00	£253.00	£22.00	9.5%
Leisure, Culture & Communities	Leisure	Racket Zone (Annual - one off payment)	Senior	£264.00	£280.50	£16.50	6.3%
Leisure, Culture & Communities	Leisure	_	Concession	£264.00	£269.50	£5.50	2.1%
Leisure, Culture & Communities	Leisure		Adult	£374.00	£385.00	£11.00	2.9%
Leisure, Culture & Communities	Leisure		Adult Add on	£299.20	£326.70	£27.50	9.2%
Leisure, Culture & Communities	Leisure		Bolt on (no longer on sale - existing customers only)	£110.00	£121.00	£11.00	10.0%
Leisure, Culture & Communities	Leisure	Junior Zone (Annual - one off payment)	3 - 10 yr olds	£165.00	£170.50	£5.50	3.3%
Leisure, Culture & Communities	Leisure		11 - 13 yr olds	£165.00	£170.50	£5.50	3.3%
Leisure, Culture & Communities	Leisure		14 - 15 yr olds	£165.00	£170.50	£5.50	3.3%
Leisure, Culture & Communities	Leisure	Leisure Card (Annual - one off payment)	Senior/Junior	£15.00	£16.00	£1.00	6.7%
Leisure, Culture & Communities	Leisure		Concession	£10.00	£11.00	£1.00	10.0%
<del>La</del> jsure, Culture & Communities	Leisure		Adult	£30.00	£32.00	£2.00	6.7%
<b>1</b> isure, Culture & Communities	Leisure		Carers	£0.00	£0.00	£0.00	
isure, Culture & Communities	Leisure		Care Leavers	£0.00	£0.00	£0.00	
Leisure, Culture & Communities	Leisure		Active Health Referral	£10.00	£11.00	£1.00	10.0%
isure, Culture & Communities	Leisure		Talented Athlete	£0.00	£0.00	£0.00	
<b>Lei</b> sure, Culture & Communities	Leisure		PfP	£0.00	£0.00	£0.00	
Leisure, Culture & Communities	Leisure	Printing/Photocopying	Per sheet	£0.50	£0.60	£0.10	20.0%
Leisure, Culture & Communities	Leisure	Spectators	Per person	£2.50	£2.50	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Hire of chairs for events etc	Per Chair	£1.50	£1.60	£0.10	6.7%
Leisure, Culture & Communities	Leisure	Hire of any equipment (rackets, balls etc)	Per person	£1.50	£1.50	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Leisure Card	Per person	£2.50	£2.50	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Pulse Card	Per person	£5.00	£6.00	£1.00	20.0%
Leisure, Culture & Communities	Leisure	Non-member	Per person	£4.00	£4.10	£0.10	2.5%
Leisure, Culture & Communities	Leisure	Leisure Card	Per person	£3.00	£3.10	£0.10	3.3%
Leisure, Culture & Communities	Leisure	Table top display (no person attendance)	Per half day	£20.00	£25.00	£5.00	25.0%
Leisure, Culture & Communities	Leisure	Display (table top or full size) with person attending	Per half day	£40.00	£45.00	£5.00	12.5%
Leisure, Culture & Communities	Leisure	Swim Nappy	Per unit	£2.00	£2.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Award Files	Per File	£10.00	£10.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Ducklings Books	Per unit	£5.00	£5.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Badges/Certificates/Sticker	Per Award	£3.60	£3.60	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Aqualetes Swim Hat	Per Hat	£1.00	£1.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Aqualetes Bag	Per Bag	£2.00	£2.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Badges/Certificates/Sticker	Per Award	£5.00	£5.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure	Racket Grip	Per Item	£3.00	£3.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Table Tennis Ball	Per Item	£0.50	£0.60	£0.10	20.0%
Leisure, Culture & Communities	Leisure	Table Tennis Ball x3	Per Item	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Leisure	Table Tennis Paddle	Per Item	£6.00	£6.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Shuttle Cocks	Per Item	£2.00	£2.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Shuttle Cocks (tube of 6)	Per Item	£8.50	£8.50	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Shuttle Cocks (Feathered)	Per Item	£2.50	£2.60	£0.10	4.0%
Leisure, Culture & Communities	Leisure	Squash Ball (Intermediate/Club - Blue)	Per Item	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Leisure	Squash Ball (Pro - Double yellow)	Per Item	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Leisure	Squash Ball (Improvers/Recreational - Red)	Per Item	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Leisure	Tennis Ball	Per Item	£2.00	£2.00	£0.00	0.0%
4e sure, Culture & Communities	Leisure	Devizes Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£2.13	£5.00	£2.87	134.7%
eisure, Culture & Communities	Leisure	Stonehenge School (Dual-use charge for Courts (Sports Hall))	Per Court	£5.00	£5.30	£0.30	6.0%
D Leisure, Culture & Communities	Leisure	Corsham Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£5.30	£5.30	£0.00	0.0%
isure, Culture & Communities	Leisure	John Bentley School (Academy) (Dual-use charge for Courts (Sports Hall))	Per Court	£5.30	£5.30	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Pewsey Vale Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£5.30	£5.30	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Kingdown Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£4.80	£4.80	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Clarendon Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£5.00	£5.30	£0.30	6.0%
Leisure, Culture & Communities	Leisure	Malmesbury Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£7.15	£7.15	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Wootton Bassett Academy (Dual-use charge for Courts (Sports Hall))	Per Court	£5.00	£5.30	£0.30	6.0%
Leisure, Culture & Communities	Leisure	Devizes Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£7.46	£9.00	£1.54	20.6%
Leisure, Culture & Communities	Leisure	Corsham Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£11.00	£11.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	John Bentley School (Academy) (Dual-use charge for Lane (Swim Pool))	Per Lane	£12.00	£13.00	£1.00	8.3%
Leisure, Culture & Communities	Leisure	Pewsey Vale Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£12.00	£13.00	£1.00	8.3%
Leisure, Culture & Communities	Leisure	Avon Valley College (Academy) (Dual-use charge for Lane (Swim Pool))	Per Lane	£12.00	£13.00	£1.00	8.3%
Leisure, Culture & Communities	Leisure	Kingdown Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£9.00	£11.00	£2.00	22.2%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure	Clarendon Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£9.00	£11.00	£2.00	22.2%
Leisure, Culture & Communities	Leisure	Malmesbury Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£11.00	£12.00	£1.00	9.1%
Leisure, Culture & Communities	Leisure	Wootton Bassett Academy (Dual-use charge for Lane (Swim Pool))	Per Lane	£11.00	£12.00	£1.00	9.1%
Leisure, Culture & Communities	Leisure	Swim Session - Adult	Non-Member	£6.00	£6.20	£0.20	3.3%
Leisure, Culture & Communities	Leisure		Leisure Card	£4.90	£5.20	£0.30	6.1%
Leisure, Culture & Communities	Leisure	Swim Session - Senior/ Junior	Non-Member	£4.90	£5.20	£0.30	6.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£3.90	£4.20	£0.30	7.7%
Leisure, Culture & Communities	Leisure	Swim Session - Family (Up to 2 adults, 3 child)	Non-Member	£17.00	£18.50	£1.50	8.8%
Leisure, Culture & Communities	Leisure		Leisure Card	£15.50	£17.00	£1.50	9.7%
Leisure, Culture & Communities	Leisure	Swim Session - Concession	Set Fee	£3.00	£3.10	£0.10	3.3%
Leisure, Culture & Communities	Leisure	Swim Session - MOD Swimming	Set Fee	£4.90	£5.20	£0.30	6.1%
<b>∆</b> isure, Culture & Communities	Leisure	School Swimming session	Child (per head) / 30 mins	£1.90	£2.00	£0.10	5.3%
(Deisure, Culture & Communities	Leisure		Lifeguard / hr	£18.00	£18.50	£0.50	2.8%
sure, Culture & Communities	Leisure		Teacher/Instructor / hr	£32.00	£33.00	£1.00	3.1%
Peisure, Culture & Communities	Leisure	Crash Course/Intensive lessons (30 min)	Non-Member	£8.50	£8.80	£0.30	3.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£7.50	£7.80	£0.30	4.0%
Leisure, Culture & Communities	Leisure		Concession	£5.60	£5.70	£0.10	1.8%
Leisure, Culture & Communities	Leisure	Crash Course/Intensives lessons (1 hr)	Non-Member	£13.40	£13.40	£0.00	0.0%
Leisure, Culture & Communities	Leisure		Leisure Card	£12.40	£12.40	£0.00	0.0%
Leisure, Culture & Communities	Leisure		Concession	£9.30	£9.30	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Crash Course/Intensive lessons (75min)	Non-Member	£11.80	£11.80	£0.00	0.0%
Leisure, Culture & Communities	Leisure		Leisure Card	£10.80	£10.80	£0.00	0.0%
Leisure, Culture & Communities	Leisure		Concession	£9.80	£9.80	£0.00	0.0%
Leisure, Culture & Communities	Leisure	NPLQ Course	Set Fee	£250.00	£260.00	£10.00	4.0%
Leisure, Culture & Communities	Leisure	Access to the Health suite for 1 hr	Non-Member	£7.40	£10.50	£3.10	41.9%
Leisure, Culture & Communities	Leisure		Leisure Card	£6.30	£9.50	£3.20	50.8%
Leisure, Culture & Communities	Leisure		Concession	£3.70	£4.70	£1.00	27.0%
Leisure, Culture & Communities	Leisure	Access to the sauna for 30 mins	Non-Member	£4.20	£6.30	£2.10	50.0%
Leisure, Culture & Communities	Leisure		Leisure Card	£3.20	£5.30	£2.10	65.6%
Leisure, Culture & Communities	Leisure		Concession	£2.10	£3.20	£1.10	52.4%
Leisure, Culture & Communities	Leisure	Class attendance (120 mins) Adult	Non-Member	£13.80	£14.20	£0.40	2.9%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Leisure Card	£12.80	£13.20	£0.40	3.1%
Leisure, Culture & Communities	Leisure	Class attendance (120 mins) Senior/Junior	Non-Member	£12.80	£13.20	£0.40	3.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£11.80	£12.20	£0.40	3.4%
Leisure, Culture & Communities	Leisure	Class attendance (120 mins) Concession	Set Fee	£6.90	£7.10	£0.20	2.9%
Leisure, Culture & Communities	Leisure	Class attendance (90 mins) Adult	Non-Member	£10.30	£10.60	£0.30	2.9%
Leisure, Culture & Communities	Leisure		Leisure Card	£9.30	£9.60	£0.30	3.2%
Leisure, Culture & Communities	Leisure	Class attendance (90 mins) Senior/ Junior	Non-Member	£9.30	£9.60	£0.30	3.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.20	£8.40	£0.20	2.4%
Leisure, Culture & Communities	Leisure	Class attendance (90 mins) Concession	Set Fee	£5.20	£5.40	£0.20	3.8%
Leisure, Culture & Communities	Leisure	Class attendance (75 mins) Adult	Non-Member	£9.80	£10.10	£0.30	3.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.80	£9.10	£0.30	3.4%
4ejsure, Culture & Communities	Leisure	Class attendance (75 mins) Senior/ Junior	Non-Member	£8.80	£9.10	£0.30	3.4%
<b>1</b> isure, Culture & Communities	Leisure		Leisure Card	£7.70	£7.90	£0.20	2.6%
isure, Culture & Communities	Leisure	Class attendance (75 mins) Concession	Set Fee	£4.90	£5.00	£0.10	2.0%
Leisure, Culture & Communities	Leisure	Class attendance (60 mins) Adult	Non-Member	£7.70	£7.90	£0.20	2.6%
sure, Culture & Communities	Leisure		Leisure Card	£6.70	£6.90	£0.20	3.0%
sure, Culture & Communities	Leisure	Class attendance (60 mins) Senior/Junior	Non-Member	£6.70	£6.90	£0.20	3.0%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.70	£5.90	£0.20	3.5%
Leisure, Culture & Communities	Leisure	Class attendance (60 mins) Concession	Set Fee	£3.80	£3.90	£0.10	2.6%
Leisure, Culture & Communities	Leisure	Class attendance (45 mins) Adult	Non-Member	£6.50	£6.70	£0.20	3.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.50	£5.70	£0.20	3.6%
Leisure, Culture & Communities	Leisure	Class attendance (45 mins) Senior/Junior	Non-Member	£5.50	£5.70	£0.20	3.6%
Leisure, Culture & Communities	Leisure		Leisure Card	£4.40	£4.50	£0.10	2.3%
Leisure, Culture & Communities	Leisure	Class attendance (45 mins) Concession	Set Fee	£3.30	£3.40	£0.10	3.0%
Leisure, Culture & Communities	Leisure	Class attendance (30 mins) Adult	Non-Member	£5.70	£5.90	£0.20	3.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£4.60	£4.70	£0.10	2.2%
Leisure, Culture & Communities	Leisure	Class attendance (30 mins) Senior/ Junior	Non-Member	£4.60	£4.70	£0.10	2.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£3.60	£3.70	£0.10	2.8%
Leisure, Culture & Communities	Leisure	Class attendance (30 mins) Concession	Set Fee	£2.80	£2.90	£0.10	3.6%
Leisure, Culture & Communities	Leisure	Virtual Class Attendance (60 mins) Adult	Non-Member	£3.70	£4.00	£0.30	8.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£3.70	£4.00	£0.30	8.1%
Leisure, Culture & Communities	Leisure	Virtual Class Attendance (60 mins) Senior/ Junior	Non-Member	£3.70	£4.00	£0.30	8.1%
Leisure, Culture & Communities	Leisure		Leisure Card	£3.70	£4.00	£0.30	8.1%
Leisure, Culture & Communities	Leisure	Virtual Class Attendance (60 mins) Concession	Set Fee	£3.70	£4.00	£0.30	8.1%
Leisure, Culture & Communities	Leisure	Specialist Class attendance 60 mins	Non-Member	£9.30	£9.60	£0.30	3.2%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.20	£8.40	£0.20	2.4%
Leisure, Culture & Communities	Leisure		Concession	£4.60	£4.70	£0.10	2.2%
Leisure, Culture & Communities	Leisure	Specialist Class attendance 45 mins	Non-Member	£9.10	£9.40	£0.30	3.3%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.00	£8.20	£0.20	2.5%
Leisure, Culture & Communities	Leisure		Concession	£4.50	£4.60	£0.10	2.2%
Leisure, Culture & Communities	Leisure	Squash (45 mins) - Adult	Non-Member	£10.50	£10.80	£0.30	2.9%
Leisure, Culture & Communities	Leisure		Leisure Card	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure	Squash (45 mins) - Senior/ Junior	Non-Member	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.40	£8.70	£0.30	3.6%
Leisure, Culture & Communities	Leisure	Squash (45 mins) - Concession	Set Fee	£5.30	£5.50	£0.20	3.8%
Leisure, Culture & Communities	Leisure	Squash - Open Mon / Mix up	Non-Member	£6.60	£6.90	£0.30	4.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.60	£5.80	£0.20	3.6%
Leisure, Culture & Communities	Leisure		Concession	£3.40	£3.50	£0.10	2.9%
isure, Culture & Communities	Leisure	Gym attendance (Tier 1 - 5R, SPR, Nadder, Vale, Calne) - Adult	Non-Member	£9.60	£10.00	£0.40	4.2%
eisure, Culture & Communities	Leisure		Leisure Card	£8.50	£8.80	£0.30	3.5%
Sisure, Culture & Communities	Leisure	Gym attendance (Tier 1 - 5R, SPR, Nadder, Vale, Calne) - Senior/ Junior	Non-Member	£8.50	£8.80	£0.30	3.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£7.50	£7.80	£0.30	4.0%
Leisure, Culture & Communities	Leisure	Gym attendance (Tier 1 - 5R, SPR, Nadder, Vale, Calne) - Concession	Set Fee	£4.80	£5.00	£0.20	4.2%
Leisure, Culture & Communities	Leisure	Gym attendance (Tier 2 - Dev, Marl, TID, Ames, OLY, LIM, TAZ, CAS, LEI, Warm) - Adult	Non-Member	£8.70	£9.00	£0.30	3.4%
Leisure, Culture & Communities	Leisure		Leisure Card	£7.70	£7.90	£0.20	2.6%
Leisure, Culture & Communities	Leisure	Gym attendance (Tier 2 - Dev, Marl, TID, Ames, OLY, LIM, TAZ, CAS, LEI, Warm) - Senior/ Junior	Non-Member	£7.70	£7.90	£0.20	2.6%
Leisure, Culture & Communities	Leisure		Leisure Card	£6.60	£6.80	£0.20	3.0%
Leisure, Culture & Communities	Leisure	Gym attendance (Tier 2 - Dev, Marl, TID, Ames, OLY, LIM, TAZ, CAS, LEI, Warm) - Concession	Set Fee	£4.40	£4.50	£0.10	2.3%
Leisure, Culture & Communities	Leisure	Gym Induction - Adult	Leisure Card	£30.00	£30.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Gym Induction - Senior/ Junior	Leisure Card	£20.00	£20.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Gym Induction - Concession	Set Fee	£20.00	£20.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Gym Induction - Military Validation	Set Fee	£20.00	£20.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Table Tennis (45 or 60 min) - Adult	Non-Member	£10.50	£10.80	£0.30	2.9%
Leisure, Culture & Communities	Leisure		Leisure Card	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure	Table Tennis (45 or 60 min) - Senior/ Junior	Non-Member	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.40	£8.70	£0.30	3.6%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure	Table Tennis (45 or 60 min) - Concession	Set Fee	£5.30	£5.50	£0.20	3.8%
Leisure, Culture & Communities	Leisure	Badminton (60 min) - Adult	Non-Member	£10.50	£10.80	£0.30	2.9%
Leisure, Culture & Communities	Leisure		Leisure Card	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure	Badminton (60 min) - Senior/ Junior	Non-Member	£9.50	£9.80	£0.30	3.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£8.40	£8.70	£0.30	3.6%
Leisure, Culture & Communities	Leisure	Badminton (60 min) - Concession	Set Fee	£5.10	£5.30	£0.20	3.9%
Leisure, Culture & Communities	Leisure	Badminton - Adult - Open (Mon/Tues)	Non-Member	£6.60	£6.90	£0.30	4.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.60	£5.80	£0.20	3.6%
Leisure, Culture & Communities	Leisure	Badminton - Child - Open (Mon/Tues)	Non-Member	£6.60	£6.90	£0.30	4.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.60	£5.80	£0.20	3.6%
Leisure, Culture & Communities	Leisure	Badminton - Open (Mon/Tues)	Concession	£3.40	£3.50	£0.10	2.9%
<del>Le</del> isure, Culture & Communities	Leisure	Outdoor Hardcourt (60 mins) - Adult	Non-Member	£7.40	£7.80	£0.40	5.4%
<b>D</b> eisure, Culture & Communities	Leisure		Leisure Card	£6.30	£6.60	£0.30	4.8%
isure, Culture & Communities	Leisure	Outdoor Hardcourt (60 mins) - Senior/ Junior	Non-Member	£6.30	£6.60	£0.30	4.8%
Leisure, Culture & Communities	Leisure		Leisure Card	£5.30	£5.60	£0.30	5.7%
sure, Culture & Communities	Leisure	Outdoor Hardcourt/Pitch (60 mins) - Concession	Set Fee	£3.70	£3.90	£0.20	5.4%
Sure, Culture & Communities	Leisure	Outdoor Pitch (60 mins) - Adult	Set Fee	£28.40	£29.80	£1.40	4.9%
Leisure, Culture & Communities	Leisure	Outdoor Pitch (60 mins) - Senior/Junior	Set Fee	£25.20	£26.50	£1.30	5.2%
Leisure, Culture & Communities	Leisure	Outdoor ATP - full pitch (60 mins) - Adult	Set Fee	£141.80	£144.60	£2.80	2.0%
Leisure, Culture & Communities	Leisure	Outdoor ATP - full pitch (60 mins) - Senior/ Junior	Set Fee	£107.10	£109.20	£2.10	2.0%
Leisure, Culture & Communities	Leisure	Outdoor ATP - third pitch (60 mins) - Adult	Set Fee	£47.30	£48.20	£0.90	1.9%
Leisure, Culture & Communities	Leisure	Outdoor ATP - third pitch (60 mins) - Senior/ Junior	Set Fee	£35.70	£36.40	£0.70	2.0%
Leisure, Culture & Communities	Leisure	Party - Sporty	Non-Member	£90.00	£105.00	£15.00	16.7%
Leisure, Culture & Communities	Leisure		Leisure Card	£75.00	£95.00	£20.00	26.7%
Leisure, Culture & Communities	Leisure	Party - Bouncers	Non-Member	£95.00	£120.00	£25.00	26.3%
Leisure, Culture & Communities	Leisure		Leisure Card	£80.00	£105.00	£25.00	31.3%
Leisure, Culture & Communities	Leisure	Party Supplement fee to Sporty - Climbing	Set Fee	£21.00	£125.00	£104.00	495.2%
Leisure, Culture & Communities	Leisure	Party Supplement fee to Sporty - Soft Play	Set Fee	£21.00	£110.00	£89.00	423.8%
Leisure, Culture & Communities	Leisure	Party - Mini Pool	Non-Member	£95.00	£125.00	£30.00	31.6%
Leisure, Culture & Communities	Leisure		Leisure Card	£80.00	£110.00	£30.00	37.5%
Leisure, Culture & Communities	Leisure	Party - Fun & Floats	Non-Member	£110.00	£105.00	-£5.00	-4.5%
Leisure, Culture & Communities	Leisure		Leisure Card	£95.00	£90.00	-£5.00	-5.3%
Leisure, Culture & Communities	Leisure	Party - Inflatable	Non-Member	£120.00	£115.00	-£5.00	-4.2%
Leisure, Culture & Communities	Leisure		Leisure Card	£105.00	£100.00	-£5.00	-4.8%
Leisure, Culture & Communities	Leisure	Party- Diving	Non-Member	£127.00	£130.00	£3.00	2.4%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure		Leisure Card	£112.00	£115.00	£3.00	2.7%
Leisure, Culture & Communities	Leisure	Extra member of staff to support the party	Set Fee	£20.00	£25.00	£5.00	25.0%
Leisure, Culture & Communities	Leisure	1 hr booking of a room for the party	Set Fee	£20.00	£25.00	£5.00	25.0%
Leisure, Culture & Communities	Leisure	Dry Activity (60 mins - includes Soft Play, Bouncy Castle, Roller Skating, Kidz Zone)	Non-Member	£3.80	£4.00	£0.20	5.3%
Leisure, Culture & Communities	Leisure		Leisure Card	£2.70	£2.80	£0.10	3.7%
Leisure, Culture & Communities	Leisure		Concession	£1.90	£2.00	£0.10	5.3%
Leisure, Culture & Communities	Leisure		Additional attendee	£2.70	£2.80	£0.10	3.7%
Leisure, Culture & Communities	Leisure	Kidz Zone (90 mins)	Non-Member	£5.70	£5.80	£0.10	1.8%
Leisure, Culture & Communities	Leisure		Leisure Card	£4.60	£4.70	£0.10	2.2%
Leisure, Culture & Communities	Leisure		Concession	£2.80	£2.90	£0.10	3.6%
te sure, Culture & Communities	Leisure		Additional attendee	£4.60	£4.70	£0.10	2.2%
isure, Culture & Communities	Leisure	Youth Only Zone (90 mins)	Non-Member	£4.50	£4.70	£0.20	4.4%
eisure, Culture & Communities	Leisure		Leisure Card	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Leisure		Concession	£2.30	£2.40	£0.10	4.3%
sure, Culture & Communities	Leisure	Climbing - 1-2-1 Coaching Session	Set Fee	£43.10	£44.00	£0.90	2.1%
Sure, Culture & Communities	Leisure	Climbing Taster Session (60 mins)	Set Fee	£5.30	£6.50	£1.20	22.6%
Leisure, Culture & Communities	Leisure	Climbing Taster Session (30 mins)	Set Fee	£5.00	£5.00	£0.00	0.0%
Leisure, Culture & Communities	Leisure	Roller Skating, Skating and Skooting	Adult	£4.70	£4.80	£0.10	2.1%
Leisure, Culture & Communities	Leisure		Child	£3.70	£3.80	£0.10	2.7%
Leisure, Culture & Communities	Leisure	External PT - Weekly charge for external PT trainers to utilise WC leisure centres. There is no limit on number of clients	Weekly Payment	£105.00	£110.00	£5.00	4.8%
Leisure, Culture & Communities	Leisure	PT Session - 1 x 30min session	Set Fee	£26.00	£26.80	£0.80	3.1%
Leisure, Culture & Communities	Leisure	PT Session - 1 x 1hr session	Set Fee	£36.00	£37.10	£1.10	3.1%
Leisure, Culture & Communities	Leisure	PT Session - 5 x 1hr sessions	Set Fee	£155.00	£159.70	£4.70	3.0%
Leisure, Culture & Communities	Leisure	PT Session - 10 x 1hr sessions	Set Fee	£280.00	£288.40	£8.40	3.0%
Leisure, Culture & Communities	Leisure	Active Health - Fitness Suite	Leisure Card	£4.20	£4.30	£0.10	2.4%
Leisure, Culture & Communities	Leisure	Active Health - Induction	Leisure Card	£9.50	£10.00	£0.50	5.3%
Leisure, Culture & Communities	Leisure	Active Health - Swimming	Leisure Card	£3.00	£3.10	£0.10	3.3%
Leisure, Culture & Communities	Leisure	Active Health Class (45 min)	Leisure Card	£3.30	£3.40	£0.10	3.0%
Leisure, Culture & Communities	Leisure	Active Health Specialist Class (1 hr)	Leisure Card	£4.60	£4.70	£0.10	2.2%
_	Leisure	Swimming Pool Hire - Main Pool (4 lane) (these fees do NOT include LG Cover)	Single Use (1 hr) - treat as Non-Member	£16.50	£17.00	£0.50	3.0%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
	Leisure		Block booking	£13.75	£14.17	£0.42	3.1%
Leisure, Culture & Communities	Leisure	Swimming Pool Hire - Main Pool (4 lane) (these fees do NOT include LG Cover)	Single Use (1 hr) - treat as Non-Member	£66.00	£0.00	-£66.00	-100.0%
Leisure, Culture & Communities	Leisure		Block booking	£55.00	£0.00	-£55.00	-100.0%
Leisure, Culture & Communities	Leisure	Swimming Pool Hire - Beach Pool (these fees do NOT include LG Cover)	Single Use (1 hr) - treat as Non-Member	£66.00	£0.00	-£66.00	-100.0%
Leisure, Culture & Communities	Leisure		Block booking	£55.00	£0.00	-£55.00	-100.0%
Leisure, Culture & Communities	Leisure	Swimming Pool Hire - Learner Pool (these fees do NOT include LG Cover)	Single Use (1 hr) - treat as Non-Member	£40.00	£45.00	£5.00	12.5%
Leisure, Culture & Communities	Leisure		Block booking	£33.33	£37.50	£4.17	12.5%
Leisure, Culture & Communities	Leisure	Sports Hall Hire - 1 Court	Single Use (1 hr) - treat as Non-Member	£10.50	£10.80	£0.30	2.9%
gsure, Culture & Communities	Leisure		Block booking	£8.75	£9.00	£0.25	2.9%
communities & Communities	Leisure	Room Hire - Tier 1	Single Use (1 hr) - treat as Non-Member	£32.30	£33.30	£1.00	3.1%
Leisure, Culture & Communities	Leisure		Block booking	£26.60	£27.75	£1.15	4.3%
Sure, Culture & Communities	Leisure	Room Hire - Tier 2	Single Use (1 hr) - treat as Non-Member	£26.60	£27.40	£0.80	3.0%
Leisure, Culture & Communities	Leisure		Block booking	£22.17	£22.83	£0.66	3.0%
Leisure, Culture & Communities	Leisure	Room Hire - Tier 3	Single Use (1 hr) - treat as Non-Member	£20.70	£21.30	£0.60	2.9%
Leisure, Culture & Communities	Leisure		Block booking	£17.25	£17.75	£0.50	2.9%
Leisure, Culture & Communities	Leisure	Climbing Wall - Booking for special events/ meets or clubs (NO instructor costs)	Single Use (1 hr) - treat as Non-Member	£32.70	£34.00	£1.30	4.0%
Leisure, Culture & Communities	Leisure		Block booking	£27.25	£28.33	£1.08	4.0%
Leisure, Culture & Communities	Leisure	Outdoor Hire - Netball, Basketball, Football (Senior/Junior)	Single Use (1 hr) - treat as Non-Member	£25.20	£26.50	£1.30	5.2%
Leisure, Culture & Communities	Leisure		Block booking	£21.00	£22.08	£1.08	5.1%
Leisure, Culture & Communities	Leisure	Outdoor Hire ATP - ADULT - Third Pitch	Single Use (1 hr) - treat as Non-Member	£47.30	£48.20	£0.90	1.9%
Leisure, Culture & Communities	Leisure		Block booking	£39.42	£40.17	£0.75	1.9%
Leisure, Culture & Communities	Leisure	Outdoor Hire ATP -ADULT - Full Pitch	Single Use (1 hr) - treat as Non-Member	£141.80	£144.60	£2.80	2.0%
Leisure, Culture & Communities	Leisure		Block booking	£118.17	£120.50	£2.33	2.0%
Leisure, Culture & Communities	Leisure	Outdoor Hire ATP - JUNIOR - Third Pitch	Single Use (1 hr) - treat as Non-Member	£35.70	£36.40	£0.70	2.0%
Leisure, Culture & Communities	Leisure		Block booking	£29.75	£30.33	£0.58	1.9%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Leisure, Culture & Communities	Leisure	Outdoor Hire ATP -JUNIOR - Full Pitch	Single Use (1 hr) - treat as Non-Member	£107.10	£109.20	£2.10	2.0%
Leisure, Culture & Communities	Leisure		Block booking	£89.25	£91.00	£1.75	2.0%
Leisure, Culture & Communities	Sports Development	Rising Stars x 3 clubs - weekly disability sports club for individuals aged 8-16 years	per person, per session	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Sports Development	Fit Club x 3 clubs - weekly disability sports club for individuals aged 17+	per person, per session	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Sports Development	Adapted Cycling - May-September - weekly cycling sessions for individuals with a disability	per person, per session	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Sports Development	County Swim squad, monthly session for gifted and talented disabled swimmers (externally funded)	per person, per session	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Sports Development	Walking Netball - 1 hour	per person, per session	£3.50	£3.60	£0.10	2.9%
Leisure, Culture & Communities	Sports Development	Walking Netball - 1.5 hour	per person, per session	£4.00	£4.20	£0.20	5.0%
eisure, Culture & Communities	Sports Development	Walking Netball - 2 hour	per person, per session	£4.50	£4.70	£0.20	4.4%
(D) Leisure, Culture & Communities	Sports Development	Walking Football - 1 hour	per person, per session	£3.50	£3.60	£0.10	2.9%
Lèisure, Culture & Communities	Sports Development	Walking Football - 1.5 hour	per person, per session	£4.00	£4.20	£0.20	5.0%
Leisure, Culture & Communities	Sports Development	Walking Football - 2 hour	per person, per session	£4.50	£4.70	£0.20	4.4%
Leisure, Culture & Communities	Sports Development	No Strings Badminton	per person, per session	£3.50	£3.60	£0.10	2.9%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
Historia O Torrio est				£	£	£	%
Highways & Transport							
Highways & Transport	Highways	STANDARD VEHICLE CROSSING APPLICATION - For the creation of a vehicle access/For the extension of a vehicle access	per application	£265.00	£295.00	£30.00	11.3%
Highways & Transport	Highways	RETROSPECTIVE VEHICLE CROSSING APPLICATION - For a certificate of lawful use of an access that has been unlawfully created	per application	£400.00	£410.00	£10.00	2.5%
Highways & Transport	Highways	COMMERCIAL VEHICLE CROSSING APPLICATION - For the creation of a vehicle access onto a commercial development/For the creation of a vehicle access onto a new development - first access	per application	£1,060.00	£1,085.00	£25.00	2.4%
Highways & Transport	Highways	COMMERCIAL VEHICLE CROSSING APPLICATION - For the creation of a vehicle access onto a commercial development/For the creation of a vehicle access onto a new development - per additional access	per application	£0.00	£0.00	£0.00	
ghways & Transport	Highways	ADMINISTRATION FEE - For re-issuing of a licence/For a change of contractor on a licence and re-issue/For copies of licences or completion certificates following their misplacement	per application	£35.00	£37.50	£2.50	7.1%
Highways & Transport	Highways	ADDITIONAL INSPECTION FEE - For any inspection conducted after 18 months of the licence being issued	per application	£75.00	£77.50	£2.50	3.3%
Highways & Transport	Highways	TRANSFER OF APPLICATION FEE - For changing the applicant to a new applicant on live applications/For changing the applicant to a new applicant on granted applications that have not been signed off as completed to highway specification	per application	£40.00	£42.50	£2.50	6.3%
Highways & Transport	Network Management	Administering a TTRO	per order	£1,850.00	£1,850.00	£0.00	0.0%
Highways & Transport	Network Management	Administering a TTRN	per order	£1,350.00	£1,350.00	£0.00	0.0%
Highways & Transport	Network Management	Recommencing a TTRO	per order	£534.00	£534.00	£0.00	0.0%
Highways & Transport	Network Management	Extension to Order in place	per order	£875.00	£875.00	£0.00	0.0%
Highways & Transport	Network Management	Section 50 new apparatus licence fee	per licence	£573.00	£573.00	£0.00	0.0%
Highways & Transport	Network Management	Section 50 Existing apparatus fee	per licence	£475.00	£475.00	£0.00	0.0%
Highways & Transport	Network Management	Urgent fast-tracked application – additional charge	Per application	£714.00	£714.00	£0.00	0.0%
Highways & Transport	Network Management	Retrospective application	Per application	£296.00	£296.00	£0.00	0.0%
Highways & Transport	Network Management	Cash deposit administration fee	Per application	£620 plus £24 permitting fees and £50 per inspection	£620 plus £24 permitting fees and £50 per inspection	£0.00	
Highways & Transport	Network Management	Signals switch off	Per application	£714.00	£714.00	£0.00	0.0%
Highways & Transport	Network Management	Charge for additional visit on same application	Per application	£296.00	£296.00	£0.00	0.0%
Highways & Transport	Passenger Transport	Post 16 standard charge £850	per person	£950.00	£1,000.00	£50.00	5.3%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Highways & Transport							
Highways & Transport	Passenger Transport	Post 16 lower charge £300	per person	£315.00	£330.00	£15.00	4.8%
Highways & Transport	Passenger Transport	Spare seat charges - Primary - less than 3 miles	per term	£180.00	£189.00	£9.00	5.0%
Highways & Transport	Passenger Transport	Spare seat charges - Primary - 3 miles or more	per term	£255.00	£267.00	£12.00	4.7%
Highways & Transport	Passenger Transport	Spare seat charges - Secondary - less than 3 miles	per term	£235.00	£247.00	£12.00	5.1%
Highways & Transport	Passenger Transport	Spare seat charges - Secondary - 3 miles or more	per term	£290.00	£304.00	£14.00	4.8%
Highways & Transport	Passenger Transport	Spare seat charges - Post 16 (Sixth From/College) - less than 3 miles	per term	£350.00	£367.00	£17.00	4.9%
Highways & Transport	Passenger Transport	Spare seat charges - Post 16 (Sixth From/College) - 3 miles or more	per term	£490.00	£514.00	£24.00	4.9%
Highways & Transport	Passenger Transport	Spare seat charges - special rate	per term	£385.00	£420.00	£35.00	9.1%
Highways & Transport	Passenger Transport	Grammar School charge	per year	£1,100.00	£1,150.00	£50.00	4.5%
Highways & Transport	Passenger Transport	Lost bus pass replacement charge (school transport and concessionary bus)	per replacement	£15.00	£15.00	£0.00	0.0%
Highways & Transport	Rights of Way	Highways Information - hourly rate	per hour	£94.39	£96.75	£2.36	2.5%
<b>+{tig</b> hways & Transport	Rights of Way	Highways and Rights of Way - hourly rate	per hour	£122.63	£125.75	£3.12	2.5%
<b>∰</b> ighways & Transport	Rights of Way	Public Rights of Way only - hourly rate	per hour	£67.80	£69.50	£1.70	2.5%
ighways & Transport	Rights of Way	Common Land and Village Green - per enquiry	per enquiry	£32.81	£33.75	£0.94	2.9%
Mghways & Transport	Rights of Way	Highway Statement or Declaration only	per statement / declaration	£289.12	£296.50	£7.38	2.6%
<b>ரு</b> <b>பு</b> ghways & Transport	Rights of Way	Public Path Orders	per order	£2,922.94	£2,999.00	£76.06	2.6%
Highways & Transport	Rights of Way	ROW - Correction of the Commons or Town and Village Green Registers for non-registration or mistaken registration of land	per correction	£2,638.16	£2,706.75	£68.59	2.6%
Highways & Transport	Rights of Way	ROW - searching for land to which rights of common attach	per hour	£85.57	£87.75	£2.22	2.6%

### Appendix 4 - Fees & Charges 2025-26

### Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
Planning	Planning	Pre-Application Planning Advice - Do I need planning permission	Per request	£65.00	£92.00 or 20% of the planning application fee, whichever is higher	£0.00	
Planning	Planning	Pre-Application Planning Advice - Planning history of a site (residential)	Per request	£65.00	£70.00	£5.00	7.7%
Planning	Planning	Pre-Application Planning Advice - Planning history of a site (non residential)	Per request		£140.00		
Planning	Planning	Pre- Application Advice - Prior Approval	Per request		£185.00 or 10% of the planning application fee, whichever is higher		
Paganning 26	Planning	Service charge for "returned applications - 10% of the expected planning application fee if processing has commenced. The charge applies to applications where a 28 day invalid letter has been sent and any subsequent reminder letters and/or email reminders.	Per application		10% of the application fee		
Ranning	Planning	Validation advice - pre checking surgery	Per application		£100.00		
Planning	Planning	Pre-Application Planning Advice - Level 1 - Householder and minor works	Per request	£134.00	£185.00	£51.00	38.1%
Planning	Planning	Pre-Application Planning Advice - Level 2 - Small residential and commercial	Per request	£367.00	£404.00	£37.00	10.1%
Planning	Planning	Pre-Application Planning Advice - Level 3 - Medium scale minor residential and commercial	Per request	£747.00	£822.00	£75.00	10.0%
Planning	Planning	Pre-Application Planning Advice - Level 4 - large scale minor residential and commercial	Per request	£1,200.00	£1,320.00	£120.00	10.0%
Planning	Planning	Pre-Application Planning Advice - Level 5 - Small scale major	Per request	£2,800.00	£3,080.00	£280.00	10.0%
Planning	Planning	Add on service - Level 2 - Level 5 site meetings based on hourly rate per officer involved (criteria will apply) This is to be used in conjunction with another scheme	Per hour		£100.00		
Planning	Planning	Pre-Application Planning Advice - Level 1 - 5 - Officer Opinion/Advice only (no consultations, no technical matters, no site visit)	Per request		50% of the planning fee		
Planning	Planning	Pre-Application Planning Advice - Level 6 - Large scale major	per request	£3500 or 10% of the planning application fee, whichever is the higher	£3850 or 10% of the full planning application fee, whichever is the higher	£0.00	
Planning	Planning	Pre-Application Planning Advice - Solar Energy - under 1 hectare	per request	£367.00	£404.00 or 10% of the planning	£0.00	

### Appendix 4 - Fees & Charges 2025-26

### Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
					fee, whichever is the higher		
Planning	Planning	Pre-Application Planning Advice - Solar Energy - over 1 hectare	per request	10% of the planning application fee	10% of the planning application fee	£0.00	
Planning	Planning	Pre-Application Planning Advice - Wind turbines and Battery Storage Units - under 1 hectare	per request	£600.00	£660.00 or 10% of the planning application fee, whichever is the higher	£0.00	
Planning	Planning	Pre-Application Planning Advice - Wind turbines and Battery Storage Units - over 1 hectare	per request	10% of the planning application fee	10% of the planning application fee	£0.00	
A Banning O	Planning	Pre-Application Planning Advice - additional meetings for level 6 plus schemes (criteria will apply) This is to be used in conjunction with another scheme	per request	£250.00	£400.00	£150.00	60.0%
26 Inning	Planning	Winning and working of minerals where site area does not exceed 15 hectares	per request	£1,100.00	£2,300.00	£1,200.00	109.1%
Planning	Planning	All waste development where the annual throughput would not exceed 50,000 tonnes per year or site area exceed 10 hectares.	per request	£1,500.00	£3,100.00	£1,600.00	106.7%
Planning	Planning	Winning and working of minerals where site area exceeds 15 hectares and proposals for the deposit, recovery, treatment and/or disposal of waste where annual throughput exceeds 50,000 tonnes per year or on a site of 10 hectares or more	per request	£1,000.00	£3,500.00	£2,500.00	250.0%
Planning	Planning	Planning - High Hedge Complaints	Per complaint	£550.00	£600.00	£50.00	9.1%
Planning	Planning	Planning - Local Land Charges - LLC1 Residential	per search	£32.00	£33.00	£1.00	3.1%
Planning	Planning	Planning - Local Land Charges - LLC1 Commercial	per search	£32.00	£33.00	£1.00	3.1%
Planning	Planning	Planning - Local Land Charges - Expedited LLC1 Residential	per search	£53.00	£55.00	£2.00	3.8%
Planning	Planning	Planning - Local Land Charges - Expedited LLC1 Commercial	per search	£53.00	£55.00	£2.00	3.8%
Planning	Planning	Planning - Local Land Charges - Con 29 Residential	per search	£152.00	£155.00	£3.00	2.0%
Planning	Planning	Planning - Local Land Charges - Con 29 Commercial	per search	£210.00	£216.00	£6.00	2.9%
Planning	Planning	Planning - Local Land Charges - Expedited Con 29 Residential	per search	£236.00	£243.00	£7.00	3.0%
Planning	Planning	Planning - Local Land Charges - Expedited Con 29 Commercial	per search	£315.00	£325.00	£10.00	3.2%
Planning	Planning	Planning - Local Land Charges - Con 290 (each) Residential	per search	£23.00	£24.00	£1.00	4.3%
Planning	Planning	Planning - Local Land Charges - Con 290 (each) Commercial	per search	£23.00	£24.00	£1.00	4.3%
Planning	Planning	Planning - Local Land Charges - Parcels (Residential) LLC1	Per parcel	£6.00	£6.50	£0.50	8.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
Planning	Planning	Planning - Local Land Charges - Parcels (Residential) Con 29	Per parcel	£13.00	£13.50	£0.50	3.8%
Planning	Planning	Planning - Local Land Charges - Parcels (Commercial) LLC1	Per parcel	£6.00	£6.50	£0.50	8.3%
Planning	Planning	Planning - Local Land Charges - Parcels (Commercial) CON 29	Per parcel	£21.00	£22.00	£1.00	4.8%
Planning	Planning	Planning - Local Land Charges - Solicitors enquiry (Residential and Commercial)	per enquiry	£32.00	£33.00	£1.00	3.1%
Planning	Planning	Planning - Local Land Charges - Duplicate copy of search	per copy	£10.00	£11.00	£1.00	10.0%
Planning	Planning	Planning - Local Land Charges - Cancellation fee (application before search progressed)	Per search	£20.00	£20.00	£0.00	0.0%
Planning	Planning	Re opening of old applications (payable to reopen an application that has not had a site inspection in the previous five years)	per application	£126.00	£132.00	£6.00	4.8%
<del>Na</del> nning	Planning	Fasttrack options available on application fees	per application	10% of the application fee	10% of the application fee	£0.00	
anning	Planning	S106 Monitoring Fees - Fixed fee per non-financial obligations	per obligation	£300.00	Remove	£0.00	
The Republic	Planning	S106 Monitoring Fees - S106 financial obligations % of the total financial contribution	per agreement	2% of total financial contribution	2.5% of total financial contribution	£0.00	
On Planning	Planning	S106 Compliance checks	Per agreement	contribution	£70.00		
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 1 Dwellings	per application	£995.00	£1,045.00	£50.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 1 Dwellings Regularisation	per application	£1,115.00	£1,170.75	£55.75	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 2 Dwellings	per application	£1,392.00	£1,462.00	£70.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 2 Dwellings Regularisation	per application	£1,559.00	£1,636.95	£77.95	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 3 Dwellings	per application	£1,707.00	£1,792.00	£85.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 3 Dwellings Regularisation	per application	£1,912.00	£2,007.60	£95.60	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 4 Dwellings	per application	£2,205.00	£2,315.00	£110.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 4 Dwellings Regularisation	per application	£2,470.00	£2,593.50	£123.50	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 5 Dwellings	per application	£2,513.00	£2,639.00	£126.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 5 Dwellings Regularisation	per application	£2,815.00	£2,955.75	£140.75	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 6 Dwellings	per application	£2,860.00	£3,003.00	£143.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 6 Dwellings Regularisation	per application	£3,203.00	£3,363.15	£160.15	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 7 Dwellings	per application	£3,206.00	£3,366.00	£160.00	5.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 7 Dwellings Regularisation	per application	£3,591.00	£3,770.55	£179.55	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 8 Dwellings	per application	£3,521.00	£3,697.00	£176.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 8 Dwellings Regularisation	per application	£3,944.00	£4,141.20	£197.20	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 9 Dwellings	per application	£3,855.00	£4,048.00	£193.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 9 Dwellings Regularisation	per application	£4,318.00	£4,533.90	£215.90	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 10 Dwellings	per application	£4,233.00	£4,445.00	£212.00	5.0%
Planning	Building Control	Building control - Table A New Dwelling (up to 200m2) - 10 Dwellings Regularisation	per application	£4,742.00	£4,979.10	£237.10	5.0%
Planning	Building Control	Building Control - Table B - Conversion of garage in to living accommodation	per application	£372.00	£391.00	£19.00	5.1%
anning	Building Control	Building Control - Table B - Conversion of garage in to living accommodation Regularisation	per application	£416.00	£436.80	£20.80	5.0%
Planning Planning	Building Control	Building Control - Table B - Garage and Car Ports up to 40m <sup>2</sup>	per application	£378.00	£397.00	£19.00	5.0%
Planning	Building Control	Building Control - Table B - Garage and Car Ports up to 40m <sup>2</sup> Regularisation	per application	£423.00	£444.15	£21.15	5.0%
Manning (	Building Control	Building Control - Table B - Electrical works (Non-competent persons scheme)	per application	£541.00	Based on individual quote	£0.00	
Planning	Building Control	Building Control - Table B - Garage and Car Ports over 40m² up to 60m²	per application	£447.00	£470.00	£23.00	5.1%
Planning	Building Control	Building Control - Table B - Garage and Car Ports over 40m² up to 60m² Regularisation	per application	£500.00	£525.00	£25.00	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions up to 10m <sup>2</sup>	per application	£554.00	£582.00	£28.00	5.1%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions up to 10m <sup>2</sup> Regularisation	per application	£620.00	£651.00	£31.00	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 10m <sup>2</sup> up to 20m <sup>2</sup>	per application	£655.00	£688.00	£33.00	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 10m <sup>2</sup> up to 20m <sup>2</sup>	per application	£734.00	£770.70	£36.70	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 20m² up to 40m²	per application	£686.00	£720.00	£34.00	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 20m² up to 40m² Regularisation	per application	£769.00	£807.45	£38.45	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over $40m^2$ up to $60m^2$	per application	£819.00	£860.00	£41.00	5.0%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 40m² up to 60m² Regularisation	per application	£917.00	£962.85	£45.85	5.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over $60m^2$ up to $80m^2$	per application	£951.00	£1,000.00	£49.00	5.2%
Planning	Building Control	Building Control - Table B - Extensions and Loft Conversions over 60m <sup>2</sup> up to 80m <sup>2</sup> Regularisation	per application	£1,065.00	£1,118.25	£53.25	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 0-2000	per application	£271.00	£285.00	£14.00	5.2%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 0-2000 Regularisation	per application	£303.00	£318.15	£15.15	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 2001-5000	per application	£328.00	£345.00	£17.00	5.2%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 2001-5000 Regularisation	per application	£367.00	£385.35	£18.35	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 5001-10000	per application	£441.00	£463.00	£22.00	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 5001-10000 Regularisation	per application	£494.00	£518.70	£24.70	5.0%
anning	Building Control	Building Control - Table C - Estimated cost of works - 10001-15000	per application	£548.00	£575.00	£27.00	4.9%
<b>P</b> anning	Building Control	Building Control - Table C - Estimated cost of works - 10001-15000 Regularisation	per application	£614.00	£644.70	£30.70	5.0%
<b>S</b> anning	Building Control	Building Control - Table C - Estimated cost of works - 15001-20000	per application	£585.00	£614.00	£29.00	5.0%
<b>O</b> Planning	Building Control	Building Control - Table C - Estimated cost of works - 15001-20000 Regularisation	per application	£656.00	£688.80	£32.80	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 20001-30000	per application	£705.00	£740.00	£35.00	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 20001-30000 Regularisation	per application	£790.00	£829.50	£39.50	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 30001-40000	per application	£825.00	£866.00	£41.00	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 30001-40000 Regularisation	per application	£924.00	£970.20	£46.20	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 40001-50000	per application	£882.00	£926.00	£44.00	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - 40001-50000 Regularisation	per application	£987.00	£1,036.35	£49.35	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - Replacement windows	per application	£220.00	£231.00	£11.00	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - Replacement windows - Regularisation	per application	£247.00	£259.35	£12.35	5.0%
Planning	Building Control	Building Control - Table C - Estimated cost of works - Copy of completion certificate	per application	£55.00	£55.00	£0.00	0.0%
Planning	Building Control	Building Control - Demolition Notice	per notice	£130.00	£137.00	£7.00	5.4%
Planning	Building Control	Building Control - Re roofing	per application	£320.00	£336.00	£16.00	5.0%
Planning	Building Control	Septic Tanks, sewage treatment plants	per application	£0.00	£298.00	£298.00	
Planning	Building Control	Pre application advice (to be taken off the application fee when submitted)	per application	£75.00	£80.00	£5.00	6.7%
Planning	Building Control	Building Control - Installation of Log Burner	per application	£550.00	£578.00	£28.00	5.1%

### Appendix 4 - Fees & Charges 2025-26

### Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Planning							
Planning	Building Control	Building Control - Installation of Log Burner if in connection to an extension	per application	£270.00	£284.00	£14.00	5.2%
Planning	Building Control	Copies of documents (non completion)	Per document	£10.00	£10.00	£0.00	0.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Highways Operations				1			
Highways & Transport	Road Safety	Bikeability (Schools)	per pupil	£6.34	£8.00	£1.66	26.2%
Highways & Transport	Road Safety	Scootability (Schools)	per pupil	£6.34	£8.00	£1.66	26.2%
Highways & Transport	Highways Operations	Burial fees -Burial in a grave -Burial of a body (coffin)	Per burial	£1,050.00	£1,075.00	£25.00	2.4%
Highways & Transport	Highways Operations	Burial fees -Burial in a grave - Large Coffin Surcharge	Per burial	£300.00	£310.00	£10.00	3.3%
Highways & Transport	Highways Operations	Burial fees -Burial of cremated remains -Burial of a body (ashes)	Per burial	£360.00	£370.00	£10.00	2.8%
Highways & Transport	Highways Operations	Burial Fees-Use of Chapels Bradford-on-Avon, Trowbridge or Westbury	Per chapel use	£200.00	£205.00	£5.00	2.5%
Highways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial -Grave (Coffin) for 40 years	Per grave	£950.00	£975.00	£25.00	2.6%
Highways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial -Grave (Coffin) extension 10 years	Per grave	£240.00	£250.00	£10.00	4.2%
ghways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial -Grave for 40 years (Child under 15 years)	Per grave	£475.00	£490.00	£15.00	3.2%
(C) (Pighways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial -Grave extension (Child-under 15 years old) 10 years	Per grave	£120.00 £125.0		£5.00	4.2%
Highways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial - Ashes plot 40 years	Per plot	£475.00	£500.00	£25.00	5.3%
⊕ghways & Transport	Highways Operations	Burial Fees - Exclusive rights of Burial - Ashes plot extension	Per plot	£120.00	£125.00	£5.00	4.2%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Headstone 36 x 24 x 12	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Headstone (for kerbs) 36 x 36	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Kerbs and or cover stone 36 x 84	Per Kerb or stone cover	£450.00	£460.00	£10.00	2.2%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Vase 12 x 12 x 12	Per vase	£55.00	£57.50	£2.50	4.5%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Statue (height 36)	Per statue	£55.00	£57.50	£2.50	4.5%
Highways & Transport	Highways Operations	Memorials - Traditional -Style- Additional Inscription	Per additional inscription	£130.00	£135.00	£5.00	3.8%
Highways & Transport	Highways Operations	Memorials - Cremated Remains -Style- Headstone 31 x 24 x 12	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Cremated Remains -Style- Book Memorial 31 x 24 x 12	Per book memorial	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Cremated Remains -Style- Tablet 24 x 24	Per tablet	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Cremated Remains -Style- Additional Inscription	Per additional inscription	£130.00	£135.00	£5.00	3.8%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Headstone 31 x 24 x 12	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Headstone (for Kerbs) 31 x 36	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- kerbs and or cover stone 36 x 60	Per Kerb or stone cover	£265.00	£275.00	£10.00	3.8%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Tablet 24 x 24	Per tablet	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Vase 12 x 12 x 12	Per vase	£55.00	£57.50	£2.50	4.5%
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Statue (height 36)	Per statue	£55.00	£57.50	£2.50	4.5%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Highways Operations			1				
Highways & Transport	Highways Operations	Memorials - Children's section -Style- Additional Inscription	Per additional inscription	£130.00	£135.00	£5.00	3.8%
Highways & Transport	Highways Operations	Memorials - Lawn section -Style -Headstone 31 x 24 x 12	Per headstone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Highways Operations	Memorials - Lawn section -Style -Additional Inscription	Per additional inscription	£130.00	£135.00	£5.00	3.8%
Highways & Transport	Highways Operations	Memorials - Cremated Remains section - Style - Garden of remembrance 16 x 12 x 3	Per stone	£285.00	£295.00	£10.00	3.5%
Highways & Transport	Fleet Services	MOTs - Staff / services such as police / ambulances - class 4, standard car	Per Mot	£54.85	£54.85	£0.00	0.0%
Highways & Transport	Fleet Services	MOTs -Staff / services such as police / ambulances - class 5, 13-16 seat minibus	Per Mot	£59.55	£59.55	£0.00	0.0%
Highways & Transport	Fleet Services	MOTs -Staff / services such as police / ambulances - class 7 Good Vehicles between 3 tonnes and 3.5 tonnes	Per Mot	£58.60	£58.60	£0.00	0.0%
<b>∰</b> ighways & Transport	Fleet Services	MOTs - Public - class 4, standard car	Per Mot	£58.85	£58.85	£0.00	0.0%
Gighways & Transport	Fleet Services	MOTs - Public - class 5, 13-16 seat minibus	Per Mot	£80.50	£80.50	£0.00	0.0%
Nighways & Transport	Fleet Services	MOTs - Public - class 7 Good Vehicles between 3 tonnes and 3.5 tonnes	Per Mot	£80.50 £80.50 £58.60 £58.60		£0.00	0.0%
Highways & Transport	Fleet Services	Other chargeable services - Fleet Lifting Operations & Lifting Equipment Regulations (LOLER) - per examination	Per examination	£80.00	£85.00	£5.00	6.3%
Highways & Transport	Fleet Services	Other chargeable services - Fleet Driver Training - Minibus Driver Awareness Scheme - per person per day	Per person, Per day	£110.00	£115.00	£5.00	4.5%
Highways & Transport	Fleet Services	Other chargeable services - Fleet Vehicles for hire to schools, community groups and voluntary groups. Cost per vehicle per day includes insurance, excludes driver, excludes fuel	Per vehicle, per day	£100.00	£110.00	£10.00	10.0%
Highways & Transport	Fleet Services	EV charging - standard	Per kWh	£0.52	£0.55	£0.03	5.8%
Highways & Transport	Fleet Services	EV charging - rapid	Per kWh	£0.52	£0.70	£0.18	34.6%
Highways & Transport	Highways	Events - Use of Council Land	per day	£320.00	£340.00	£20.00	6.3%
Highways & Transport	Highways	Administration Fee	Per admin fee	£43.00	£45.00	£2.00	4.7%
Highways & Transport	Highways	Town Traders - Annual Street Trading Consent all days of the year, including Bank Holidays	Annual	£4,600.00	£5,000.00	£400.00	8.7%
Highways & Transport	Highways	Town Traders Daily Street Trading Consent - All days of the week, including Bank Holidays where these fall on the days included in the consent.	Per day	£60.00	£65.00	£5.00	8.3%
Highways & Transport	Highways	Town Traders - Block Street Trading Consent	Per day	£350.00	£385.00	£35.00	10.0%
Highways & Transport	Highways	Short Term Static Consent (Town Traders)	Annual	£1,750.00	£1,925.00	£175.00	10.0%
Highways & Transport	Highways	Mobile Consent (Town Traders)	Annual	£2,400.00	£2,640.00	£240.00	10.0%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
Highways Operations							
Highways & Transport	Highways	All other traders - Annual Street Trading Consent - all days of the year, including Bank Holidays	Annual	£2,500.00	£2,750.00	£250.00	10.0%
Highways & Transport	Highways	Daily Street Trading Consent - All days of the week, including Bank Holidays	Per day	£28.00	£30.80	£2.80	10.0%
Highways & Transport	Highways	Block Street Trading Consent	Per day	£350.00	£385.00	£35.00	10.0%
Highways & Transport	Highways	Short Term Static Consent (All other traders)	Annual	£950.00	£1,045.00	£95.00	10.0%
Highways & Transport	Highways	Mobile Consent (All other traders)	Annual	£1,300.00	£1,430.00	£130.00	10.0%
Highways & Transport	Highways	Knowledge Test	Per test	£38.00	£38.00	£0.00	0.0%
Highways & Transport	Highways	Replacement Badge Charge	Per badge	£14.00	£14.00	£0.00	0.0%
Highways & Transport	Highways	Replacement of lost exterior plate	Per Plate	£31.00	£31.00	£0.00	0.0%
Hughways & Transport	Highways	Replacement of Internal Window Plate	Per Plate	£13.00	£13.00	£0.00	0.0%
glighways & Transport	Highways	Replacement External Plate Holder	Per Plate	£10.00	£10.00	£0.00	0.0%
(B) ighways & Transport	Highways	Cancellation or missed appointment fee (per 1/2 hour appointment)	Per Appointment	£50.00	£50.00	£0.00	0.0%
<b>N</b> ighways & Transport	Highways	Daily Fee for Non return of vehicle licence plates after 7 days	Per day	£11.00	£11.00	£0.00	0.0%
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Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PEOPLE							
Education & Skills							
Education & Skills	Targeted Education	BSS Advisory teacher (Schools)	per day	£513.00	£529.00	£16.00	3.1%
Education & Skills	Targeted Education	BSS Behaviour Assistant (Schools)	per day	£243.00	£251.00	£8.00	3.3%
Education & Skills	School Effectiveness	Headteacher performance management Autumn review (Academies)	half day	£303.00	£312.00	£9.00	3.0%
Education & Skills	School Effectiveness	Headteacher performance management Autumn review and write up (Academies)	full day	£465.00	£479.00	£14.00	3.0%
Education & Skills	School Effectiveness	School Governance Standard Clerking Service (Schools)	per package	£2,058.00	£2,120.00	£62.00	3.0%
Education & Skills	School Effectiveness	School Governance Enhanced Clerking Service (Schools)	per package	£2,808.00	£2,892.00	£84.00	3.0%
Education & Skills	School Effectiveness	School Governance Core package (Schools)	per package	£1,339.00	£1,379.00	£40.00	3.0%
Education & Skills	School Effectiveness	School Governance Clerking Service (Schools)	per package	£2,058.00	£2,120.00	£62.00	3.0%
Education & Skills	School Effectiveness	School Governance review (Schools)	per package	£1,101.00	£1,134.00	£33.00	3.0%
P စု မျာucation & Skills P ည	School Effectiveness	Learning outside the classroom and EVOLVE (Academies) charges are based on AY	per pupil	£252 <200 NOR, >201 NOR £1.25 per NOR	£258 <200 NOR, >201 NOR £1.30 per NOR	£8.00 and £0.04	3.0%
Education & Skills	School Effectiveness	Learning outside the classroom and EVOLVE (LA maintained) charges are based on AY	per pupil	£126 <200 NOR, >201 NOR £0.63 per NOR	£130 <200 NOR, >201 NOR £0.65 per NOR	£4.00 and £0.02	3.0%
Education & Skills	Early Years	EY Support package for registered childminders (Schools)	per package	£74.00	£76.00	£2.00	2.7%
Education & Skills	School Effectiveness	ELSA Supervision (Schools)	per package	£168.00	£173.00	£5.00	3.0%
Education & Skills	Targeted Education	EWO Support (Schools)	per day	£386.00	£398.00	£12.00	3.1%
Education & Skills	Targeted Education	Support for Travellers package: 6 week intervention (Schools)	per package	£1,040.00	£1,071.00	£31.00	3.0%
Education & Skills	Targeted Education	Support for Travellers package: 12 week intervention (Schools)	per package	£1,771.00	£1,824.00	£53.00	3.0%
Education & Skills	Targeted Education	Bilingual assistant package: short term 6 sessions (3 hours) (Schools)	per package	£769.00	£792.00	£23.00	3.0%
Education & Skills	Targeted Education	Bilingual assistant package: full year 36 sessions (3 hours) (Schools)	per package	£4,520.00	£4,656.00	£136.00	3.0%
Education & Skills	Targeted Education	EMTAS Advisory Teacher (Schools)	per day	£513.00	£528.00	£15.00	2.9%
Education & Skills	Targeted Education	EMTAS Advisory Teacher session (Schools)	per half day	£280.00	£288.00	£8.00	2.9%
Education & Skills	Targeted Education	EMTAS Advisory Teacher session (Schools)	1 hour	£119.00	£123.00	£4.00	3.4%
Education & Skills	Targeted Education	EMTAS Bilingual Assistant (Schools)	per day	£243.00	£250.00	£7.00	2.9%
Education & Skills	Targeted Education	EMTAS Bilingual Assistant session (Schools)	per half day	£132.00	£136.00	£4.00	3.0%
Education & Skills	Targeted Education	EMTAS Bilingual Assistant session (Schools)	1 hour	£59.00	£61.00	£2.00	3.4%
Education & Skills	School Effectiveness	LRH Platinum subscription (Schools)	per pupil	£16.95	£17.50	£0.55	3.2%

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PEOPLE							
Education & Skills							
Education & Skills	School Effectiveness	LRH Gold subscription (Schools)	per pupil	£16.25	£16.75	£0.50	3.1%
Education & Skills	School Effectiveness	LRH Silver subscription (Schools)	per package	£1,400.00	£1,442.00	£42.00	3.0%
Education & Skills	School Effectiveness	LRH Bronze subscription (Schools)	per package	£650.00	£670.00	£20.00	3.1%
Education & Skills	School Effectiveness	LRH Individual Class (Schools)	per package	£400.00	£412.00	£12.00	3.0%
Education & Skills	School Effectiveness	LRH School visitor (Schools)	per class	£172.43	£178.00	£5.58	3.2%
Education & Skills	School Effectiveness	LRH School Library advice (Schools)	per hour	£85.00	£88.00	£3.00	3.5%
Education & Skills	School Effectiveness	Safeguarding Health Check	half day	£303.00	£312.00	£9.00	3.0%
Education & Skills	School Effectiveness	Safeguarding Training	half day	£334.00	£344.00	£10.00	3.0%
Education & Skills	School Effectiveness	Safeguarding SCR Check	1 hour	£42.00	£43.00	£1.00	2.4%
Gucation & Skills	School Effectiveness	Safeguarding review primary	1.5 days	£721.00	£743.00	£22.00	3.1%
ucation & Skills	School Effectiveness	Safeguarding review secondary	1.5 days	£1,327.00	£1,367.00	£40.00	3.0%
Education & Skills	School Effectiveness	Supervision to Safeguard Package	per package	£251.00	£259.00	£8.00	3.2%
Education & Skills	School Effectiveness	Supervision to Safeguard session	per session	£47.00	£48.00	£1.00	2.1%
Aucation & Skills	School Effectiveness	SEND Review primary	1.5 days	£721.00	£743.00	£22.00	3.1%
Education & Skills	School Effectiveness	SEND Review secondary	1.5 days	£1,327.00	£1,367.00	£40.00	3.0%
Education & Skills	School Effectiveness	SEND Review large secondary	1.5 days	£1,620.00	£1,669.00	£49.00	3.0%
Education & Skills	School Effectiveness	School Effectiveness Advice & support (Schools)	per 2 hour	£209.00	£215.00	£6.00	2.9%
Education & Skills	School Effectiveness	School Effectiveness Advice & support (Schools)	per half day	£303.00	£312.00	£9.00	3.0%
Education & Skills	School Effectiveness	School Effectiveness Advice & support (Schools)	per day	£549.00	£565.00	£16.00	2.9%
Education & Skills	School Effectiveness	Headteacher recruitment package (Schools)	per package	£1,313.00	£1,352.00	£39.00	3.0%
Education & Skills	School Effectiveness	Headteacher performance management Autumn review (Schools)	half day	£204.00	£210.00	£6.00	2.9%
Education & Skills	School Effectiveness	Headteacher performance management Autumn review and write up (Schools)	full day	£308.00	£317.00	£9.00	2.9%
Education & Skills	School Effectiveness	Moderation & Monitoring Registration (Schools)	per package	£63.00	£65.00	£2.00	3.2%
Education & Skills	School Effectiveness	Review of school data	half day	£308.00	£317.00	£9.00	2.9%
Education & Skills	School Effectiveness	Perspective Lite (Schools)	per package	£351.00	£362.00	£11.00	3.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
PEOPLE							
Housing							
Housing	Housing	Homes4wiltshire property advert charges	per advert	£83.00	£85.00	£2.00	2.4%
Housing	Housing	Homes4wiltshire annual housing provider charge	annual	£32,903	£33,627.00	£724.00	2.2%
Housing	Housing	Homes4wiltshire penalty charge fee	per incorrect advert	£19.00	£20.00	£1.00	5.3%
Living and Ageing Well							
Living and Ageing Well	Court of Protection	Appointeeship work (This charge is not applied to client who have under £2,000, it is also not charged to Section 117 clients)	Per week		£5.00		
Adults	Living and Ageing Well	Arrangement and processing of Deferred loan	per loan	£723.00	£1,184.00	£461.00	63.8%
Adults	Living and Ageing Well	Arrangement of package for self funding clients	per client		£350.00	£350.00	
Adults	Living and Ageing Well	Annual fee for maintenance of self funder package	per package		£135.00	£135.00	

Appendix 4 - Fees & Charges 2025-26 Fees not prescribed in regulation

Service	Description of fee/charge	per hour, per day etc)	charges 2024/25	Proposed charge	Increase / (Decrease)	Increase / (Decrease)
			£	£	£	%
Accounting and Budget Support	A&BS Light Touch package (Schools)	per package	£803.00	£827.00	£24.00	3.0%
Accounting and Budget Support	A&BS Core package (Schools)	per package	£1,803.00	£1,857.00	£54.00	3.0%
Accounting and Budget Support	A&BS Enhanced package (Schools)	per package	£2,511.00	£2,586.00	£75.00	3.0%
Accounting and Budget Support	A&BS New Bursar / Finance Officer Support Package (Schools)	per package	£876.00	£902.00	£26.00	3.0%
Accounting and Budget Support	A&BS Headteachers' Financial Management Programme (Schools)	per package	£803.00	£827.00	£24.00	3.0%
Accounting and Budget Support	A&BS operational site visits (Schools)	per half day	£262.00	£270.00	£8.00	3.1%
Accounting and Budget Support	A&BS Helpdesk (Schools)	per package	£311.00	£320.00	£9.00	2.9%
Revenues and Benefits	Free School Meals Eligibility Checking Service (Schools)	per pupil	£0.82	£0.85	£0.03	3.7%
ІТ	Street Naming & Numbering Fees - Addition of house/Company Name or House/Company Renaming	per house/company	£76.67	£79.00	£2.33	3.0%
IT	Street Naming & Numbering Fees - New Developments first address	First address	£168.63	£174.00	£5.37	3.2%
IT	Street Naming & Numbering Fees - New Developments additional address	additional address	£61.34	£63.00	£1.66	2.7%
	Accounting and Budget Support Revenues and Benefits  IT	Accounting and Budget Support  A&BS Core package (Schools)  Accounting and Budget Support  A&BS Enhanced package (Schools)  Accounting and Budget Support  A&BS New Bursar / Finance Officer Support Package (Schools)  Accounting and Budget Support  A&BS Headteachers' Financial Management Programme (Schools)  Accounting and Budget Support  A&BS operational site visits (Schools)  Accounting and Budget Support  A&BS Helpdesk (Schools)  Free School Meals Eligibility Checking Service (Schools)  IT  Street Naming & Numbering Fees - Addition of house/Company Name or House/Company Renaming  IT  Street Naming & Numbering Fees - New Developments first address  Street Naming & Numbering Fees - New Developments additional	Accounting and Budget Support  A&BS Light Touch package (Schools)  Accounting and Budget Support  A&BS Core package (Schools)  Accounting and Budget Support  A&BS Enhanced package (Schools)  Accounting and Budget Support  A&BS New Bursar / Finance Officer Support Package (Schools)  Accounting and Budget Support  A&BS New Bursar / Finance Officer Support Package (Schools)  Accounting and Budget Support  A&BS Headteachers' Financial Management Programme (Schools)  Accounting and Budget Support  A&BS operational site visits (Schools)  Accounting and Budget Support  A&BS Helpdesk (Schools)  Revenues and Benefits  Free School Meals Eligibility Checking Service (Schools)  per package  Free School Meals Eligibility Checking Service (Schools)  per pupil  Street Naming & Numbering Fees - Addition of house/Company Name or House/Company Renaming  Street Naming & Numbering Fees - New Developments first address  First address  Street Naming & Numbering Fees - New Developments additional	Accounting and Budget Support A&BS Light Touch package (Schools) per package £803.00 Accounting and Budget Support A&BS Core package (Schools) per package £1,803.00 Accounting and Budget Support A&BS Enhanced package (Schools) per package £2,511.00 Accounting and Budget Support A&BS New Bursar / Finance Officer Support Package (Schools) per package £876.00 Accounting and Budget Support A&BS New Bursar / Financial Management Programme (Schools) per package £876.00 Accounting and Budget Support A&BS operational site visits (Schools) per half day £262.00 Accounting and Budget Support A&BS Helpdesk (Schools) per package £311.00 Revenues and Benefits Free School Meals Eligibility Checking Service (Schools) per pupil £0.82  IT Street Naming & Numbering Fees - Addition of house/Company Name or House/Company & £168.63 Street Naming & Numbering Fees - New Developments first address First address £168.63  Street Naming & Numbering Fees - New Developments additional £61.34	Accounting and Budget Support A&BS Light Touch package (Schools) per package £803.00 £827.00 Accounting and Budget Support A&BS Core package (Schools) per package £1,803.00 £1,857.00 Accounting and Budget Support A&BS Enhanced package (Schools) per package £2,511.00 £2,586.00 Accounting and Budget Support A&BS New Bursar / Finance Officer Support Package (Schools) per package £876.00 £902.00 Accounting and Budget Support A&BS Headteachers' Financial Management Programme (Schools) per package £803.00 £827.00 Accounting and Budget Support A&BS operational site visits (Schools) per half day £262.00 £270.00 Accounting and Budget Support A&BS Helpdesk (Schools) per package £311.00 £320.00 Revenues and Benefits Free School Meals Eligibility Checking Service (Schools) per pupil £0.82 £0.85  IT Street Naming & Numbering Fees - New Developments first address First address £168.63 £174.00  IT Street Naming & Numbering Fees - New Developments additional 661.34 £63.00	Accounting and Budget Support A&BS Light Touch package (Schools) per package £803.00 £827.00 £24.00 Accounting and Budget Support A&BS Core package (Schools) per package £1,803.00 £1,857.00 £54.00 Accounting and Budget Support A&BS Enhanced package (Schools) per package £2,511.00 £2,586.00 £75.00 Accounting and Budget Support A&BS New Bursar / Finance Officer Support Package (Schools) per package £876.00 £902.00 £26.00 Accounting and Budget Support A&BS Headteachers' Financial Management Programme (Schools) per package £803.00 £827.00 £24.00 Accounting and Budget Support A&BS operational site visits (Schools) per half day £262.00 £270.00 £8.00 Accounting and Budget Support A&BS Helpdesk (Schools) per package £311.00 £320.00 £9.00 Revenues and Benefits Free School Meals Eligibility Checking Service (Schools) per pupil £0.82 £0.85 £0.03  IT Street Naming & Numbering Fees - New Developments first address First address £168.63 £174.00 £5.37 Street Naming & Numbering Fees - New Developments additional additional £61.34 £63.00 £1.66

### Appendix 4 - Fees & Charges 2025-26

### Fees not prescribed in regulation

Directorate Service		Description of fee/charge	Charge basis (e.g. per hour, per day etc)	per hour, per day Approved charges 2024/25 ch		Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
RESOURCES							
HR & OD							
HR&OD	HR&OD	Payroll Premium package (Schools)	per staff headcount	£85.76	£88.33	£2.57	3.0%
HR&OD	HR&OD	Payroll Standard package (Schools)	per staff headcount	£70.00	£72.10	£2.10	3.0%
HR&OD	HR&OD	payroll LA school package (Schools)	per package	HR admin base cost £468.83 plus £4.68 per pupil & payroll £49.30 per employee	HR admin base cost £482.89 plus £4.82 per pupil & payroll £50.78 per employee	£0.00	
HR&OD	HR&OD	HR Advisory Services (per employee)	per staff headcount	£54.50	£56.14	£1.64	3.0%
HR&OD	HR&OD	HR Advisory Services LA Schools	per package	£220.25 flat rate plus £5.50 per number on role	£226.86 flat rate plus £5.67 per number on role	£0.00	
<del>+∥</del> ,80D	HR&OD	Wiltshire Rewards (Schools)	per staff headcount	£3.34	£3.44	£0.10	3.0%
<b>Q∆</b> R&OD	HR&OD	Headship recruitment administration (Schools)	per package	£289.00	£298.00	£9.00	3.1%
R&OD	HR&OD	Advertising Basic (Single Advert) LA Schools	per advert	£39.00	£40.00	£1.00	2.6%
HR&OD	HR&OD	Advertising Basic (Single Advert) Academy Schools	per advert	£94.00	£97.00	£3.00	3.2%
HR&OD	HR&OD	Advertising Basic (Single Advert) External	per advert	£139.00	£143.00	£4.00	2.9%
THIR &OD	HR&OD	Advertising Standard (Single Advert) LA Schools	per advert	£61.00	£63.00	£2.00	3.3%
HR&OD	HR&OD	Advertising Standard (Single Advert) Academy Schools	per advert	£116.00	£119.00	£3.00	2.6%
HR&OD	HR&OD	Advertising Standard (Single Advert) External	per advert	£161.00	£166.00	£5.00	3.1%
HR&OD	HR&OD	Advertising Premium (Single Advert) LA Schools	per advert	£78.00	£80.00	£2.00	2.6%
HR&OD	HR&OD	Advertising Premium (Single Advert) Academy Schools	per advert	£133.00	£137.00	£4.00	3.0%
HR&OD	HR&OD	Advertising Premium (Single Advert) External	per advert	£175.00	£180.00	£5.00	2.9%
HR&OD	HR&OD	Early Years Settings Standard Single Advert	per advert	£50.00	£52.00	£2.00	4.0%
HR&OD	HR&OD	Early Years Settings Premium Single Advert	per advert	£89.00	£92.00	£3.00	3.4%
HR&OD	HR&OD	Charities Basic Single Advert	per advert	£26.00	£27.00	£1.00	3.8%
HR&OD	HR&OD	Charities Standard Single Advert	per advert	£46.00	£47.00	£1.00	2.2%
HR&OD	HR&OD	Charities Premium Single Advert	per advert	£61.00	£63.00	£2.00	3.3%
HR&OD	HR&OD	Advertising Basic x10 (LA) (Schools)	per package	£370.00	£381.00	£11.00	3.0%
HR&OD	HR&OD	Advertising Basic x10 (Academy) (Schools)	per package	£893.00	£920.00	£27.00	3.0%
HR&OD	HR&OD	Advertising Basic x10 (External) (Schools)	per package	£1,320.00	£1,360.00	£40.00	3.0%
HR&OD	HR&OD	Advertising Standard x10 (LA) (Schools)	per package	£580.00	£597.00	£17.00	2.9%
HR&OD	HR&OD	Advertising Standard x10 (Academy) (Schools)	per package	£1,100.00	£1,133.00	£33.00	3.0%
HR&OD	HR&OD	Advertising Standard x10 (External) (Schools)	per package	£1,530.00	£1,576.00	£46.00	3.0%
HR&OD	HR&OD	Advertising Premium x10 (LA) (Schools)	per package	£740.00	£762.00	£22.00	3.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
RESOURCES							
HR & OD							
HR&OD	HR&OD	Advertising Premium x10 (Academy) (Schools)	per package	£1,260.00	£1,298.00	£38.00	3.0%
HR&OD	HR&OD	Advertising Premium x10 (External) (Schools)	per package	£1,660.00	£1,710.00	£50.00	3.0%
HR&OD	HR&OD	Advertising Basic x20 (LA) (Schools)	per package	£700.00	£721.00	£21.00	3.0%
HR&OD	HR&OD	Advertising Basic x20 (Academy) (Schools)	per package	£1,700.00	£1,751.00	£51.00	3.0%
HR&OD	HR&OD	Advertising Basic x20 (External) (Schools)	per package	£2,500.00	£2,575.00	£75.00	3.0%
HR&OD	HR&OD	Advertising Standard x20 (LA) (Schools)	per package	£1,100.00	£1,133.00	£33.00	3.0%
HR&OD	HR&OD	Advertising Standard x20 (Academy) (Schools)	per package	£2,100.00	£2,163.00	£63.00	3.0%
HR&OD	HR&OD	Advertising Standard x20 (External) (Schools)	per package	£2,905.00	£2,992.00	£87.00	3.0%
HR&OD	HR&OD	Advertising Premium x20 (LA) (Schools)	per package	£1,400.00	£1,442.00	£42.00	3.0%
<del>-U</del> S&OD	HR&OD	Advertising Premium x20 (Academy) (Schools)	per package	£2,405.00	£2,477.00	£72.00	3.0%
<b>₫₼</b> R&OD	HR&OD	Advertising Premium x20 (External) (Schools)	per package	£3,205.00	£3,301.00	£96.00	3.0%
<b>©</b> <b>™</b> R&OD	HR&OD	DBS - Enhanced check Please note this price is set by the DBS	Per check	£38.00	£39.00	£1.00	2.6%
<b>2 * * * * * * * * * *</b>	HR&OD	DBS - Standard check Please note this price is set by the DBS	Per check	£18.00	£19.00	£1.00	5.6%
HR&OD	HR&OD	DBS - Basic Check Please note this price is set by the DBS	Per check	£18.00	£19.00	£1.00	5.6%
HR&OD	HR&OD	Admin charge to be added	Per check	£17.50	£18.00	£0.50	2.9%
HR&OD	HR&OD	Paediatric First Aid	Per course	£135.00	£139.00	£4.00	3.0%
HR&OD	HR&OD	Paediatric First Aid (group of 8-12 at client venue)	Per group course	£1,035.00	£1,066.00	£31.00	3.0%
HR&OD	HR&OD	Cancellation charge - more than 14 days notice	Per course	Cancellation more than 14 days no penalty		£0.00	
HR&OD	HR&OD	Cancellation charge - less than 14 days notice	Per course	Cancellation under 13 days no refund (matching RC policy)		£0.00	
HR&OD	HR&OD	Health and social care course 2 hrs	Per course	£54.00	£56.00	£2.00	3.7%
HR&OD	HR&OD	Health and social care course 2 hrs (group of 8-15 at client venue)	Per group course	£350.00	£361.00	£11.00	3.1%
HR&OD	HR&OD	Health and social care course 3 hrs	Per course	£66.00	£68.00	£2.00	3.0%
HR&OD	HR&OD	Health and social care course 3 hrs (group of 8-15 at client venue)	Per group course	£380.00	£391.00	£11.00	2.9%
HR&OD	HR&OD	Health and social care course 7 hrs	Per course	£115.00	£118.00	£3.00	2.6%
HR&OD	HR&OD	Health and social care course 7 hrs (group of 8-15 at client venue)	Per group course	£835.00	£860.00	£25.00	3.0%
HR&OD	HR&OD	Mental health course 2 hrs	Per course	£61.00	£63.00	£2.00	3.3%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	f11.00 f2.00 f4.00	Increase / (Decrease)
				£	£	£	%
RESOURCES							
HR & OD							
HR&OD	HR&OD	Mental health courses 2 hrs (group of 8-15 at client venue)	Per group course	£375.00	£386.00	£11.00	2.9%
HR&OD	HR&OD	Mental health courses 3hrs	Per course	£75.00	£77.00	£2.00	2.7%
HR&OD	HR&OD	Mental health courses 3hrs (group of 8-15 at client venue)	Per group course	£480.00	£494.00	£14.00	2.9%
HR&OD	HR&OD	Mental health courses 7hrs	Per course	£125.00	£129.00	£4.00	3.2%
HR&OD	HR&OD	Mental health courses 7hrs (group of 8-15 at client venue)	Per group course	£875.00	£901.00	£26.00	3.0%
HR&OD	HR&OD	Digital skills courses 2hrs	Per course	£61.00	£63.00	£2.00	3.3%
HR&OD	HR&OD	Digital skills courses 2hrs (group of 8-15 at client venue)	Per group course	£375.00	£386.00	£11.00	2.9%
HR&OD	HR&OD	Digital skills courses 3hrs	Per course	£75.00	£77.00	£2.00	2.7%
HR&OD	HR&OD	Digital skills courses 3hrs (group of 8-15 at client venue)	Per group course	£480.00	£494.00	£14.00	2.9%
JK&OD	HR&OD	Digital skills courses 7hrs	Per course	£125.00	£129.00	£4.00	3.2%
<b>⊕</b> R&OD	HR&OD	Digital skills courses 7hrs (group of 8-15 at client venue)	Per group course	£875.00	£901.00	£26.00	3.0%
<b>₽</b> R&OD	HR&OD	Professional development courses 2hrs	Per course	£61.00	£63.00	£2.00	3.3%
2#&OD	HR&OD	Professional development courses 2hrs (group of 8-15 at client venue)	Per group course	£375.00	£386.00	£11.00	2.9%
HR&OD	HR&OD	Professional development courses 3hrs	Per course	£75.00	£77.00	£2.00	2.7%
HR&OD	HR&OD	Professional development courses 3hrs (group of 8-15 at client venue)	Per group course	£480.00	£494.00	£14.00	2.9%
HR&OD	HR&OD	Professional development courses 7hrs	Per course	£125.00	£129.00	£4.00	3.2%
HR&OD	HR&OD	Professional development courses 7hrs (group of 8-15 at client venue)	Per group course	£875.00	£901.00	£26.00	3.0%
Assets	Health & Safety	Health & Safety package secondary (VA/F Schools)	per package	£1,781.73	£1,835.00	£53.28	3.0%
Assets	Health & Safety	Health & Safety package large primary/special (VA/F Schools)	per package	£1,003.20	£1,033.00	£29.80	3.0%
Assets	Health & Safety	Health & Safety package small primary (VA/F Schools)	per package	£481.75	£496.00	£14.26	3.0%
Assets	Health & Safety	online H&S training courses	per course	£56.43	£58.00	£1.57	2.8%
Assets	Health & Safety	CLEAPPS Membership - Primary	per pupil	£0.22	£0.25	£0.03	13.6%
Assets	Health & Safety	CLEAPPS Membership - Secondary	per pupil	£0.30	£0.35	£0.05	16.7%
HR&OD	HR&OD	Occupational health appointment with nurse	per appointment	£226.00	£233.00	£7.00	3.1%
HR&OD	HR&OD	Occupational health review appointment with nurse	per appointment	£178.00	£183.00	£5.00	2.8%
HR&OD	HR&OD	Occupational health appointment with doctor	per appointment	£399.00	£411.00	£12.00	3.0%
HR&OD	HR&OD	Occupational health review appointment with doctor	per appointment	£327.00	£337.00	£10.00	3.1%
HR&OD	HR&OD	New starter telephone assessment with nurse	per appointment	£161.00	£166.00	£5.00	3.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
RESOURCES							
HR & OD							
HR&OD	HR&OD	New starter telephone assessment with doctor	per appointment	£315.00	£324.00	£9.00	2.9%
HR&OD	HR&OD	New starter face-to-face assessment with nurse	per appointment	£184.00	£190.00	£6.00	3.3%
HR&OD	HR&OD	New starter face-to-face assessment with doctor	per appointment	£333.00	£343.00	£10.00	3.0%
HR&OD	HR&OD	Ill health retirement assessment	per appointment	£428.00	£441.00	£13.00	3.0%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
CHIEF EXECUTIVE							
Legal & Governance							
Legal & Governance	Registration	Non-refundable reservation fee for all types of ceremonies.	Per Reservation	£60.00	£70.00	£10.00	16.7%
Legal & Governance	Registration	Non-refundable amendment fee for all types of ceremonies	Per Amendment	£35.00	£40.00	£5.00	14.3%
Legal & Governance	Registration	Marriage/CP Ceremony in The Study at Salisbury, and The Persimmon and Study Rooms, Chippenham (6) Mon only	Per Ceremony	£200.00	£225.00	£25.00	12.5%
Legal & Governance	Registration	Marriage/CP Ceremony in small Office ceremony room (40) Monday - Wednesday	Per Ceremony	£330.00	£360.00	£30.00	9.1%
Legal & Governance	Registration	Marriage/CP Ceremony in small Office ceremony room (40) Thursday - Friday	Per Ceremony	£385.00	£420.00	£35.00	9.1%
Legal & Governance	Registration	Marriage/CP Ceremony in small office ceremony room (40) Saturday	Per Ceremony	£440.00	£485.00	£45.00	10.2%
Legal & Governance	Registration	Marriage/CP Ceremony in large Office ceremony room (60-70) Monday - Wednesday	Per Ceremony	£360.00	£395.00	£35.00	9.7%
tegal & Governance	Registration	Marriage/CP Ceremony in large Office ceremony room (60-70), Thursday - Friday	Per Ceremony	£440.00	£485.00	£45.00	10.2%
©gal & Governance	Registration	Marriage/CP Ceremony in large Office ceremony room (60-70), Saturday	Per Ceremony	£495.00	£545.00	£50.00	10.1%
Legal & Governance	Registration	Marriage/CP in an Approved Venue Monday to Wednesday	Per Ceremony	£525.00	£575.00	£50.00	9.5%
<b>©</b> gal & Governance	Registration	Marriage/CP in an Approved Venue Friday Thursday	Per Ceremony	£575.00	£630.00	£55.00	9.6%
Legal & Governance	Registration	Marriage/CP in an Approved Venue Saturday	Per Ceremony	£625.00	£685.00	£60.00	9.6%
Legal & Governance	Registration	Marriage/CP in an Approved Venue Sunday/Public or Bank Holidays	Per Ceremony	£655.00	£750.00	£95.00	14.5%
Legal & Governance	Registration	Marriage/CP in an Approved Venue Evenings (17:00 onwards)	Per Ceremony	£675.00	£725.00	£50.00	7.4%
Legal & Governance	Registration	Combination ceremony package includes small stat ceremony, 2nd celebratory ceremony & inspection fee	Per Ceremony	£725.00	£800.00	£75.00	10.3%
Legal & Governance	Registration	Combination Ceremony - Each additional meeting to create bespoke ceremonies	Per Meeting	£60.00	£70.00	£10.00	16.7%
Legal & Governance	Registration	Single event venue inspection fee	Per Inspection	£75.00	£75.00	£0.00	0.0%
Legal & Governance	Registration	Conversion of CP to Marriage only in an Approved Venue Monday to Wednesday	Per Ceremony	£525.00	£575.00	£50.00	9.5%
Legal & Governance	Registration	Conversion of CP to Marriage only in an Approved Venue Thursday - Friday	Per Ceremony	£575.00	£630.00	£55.00	9.6%
Legal & Governance	Registration	Conversion of CP to Marriage only in an Approved Venue Saturday	Per Ceremony	£625.00	£685.00	£60.00	9.6%
Legal & Governance	Registration	Conversion of CP to Marriage only in an Approved Venue Sunday/Public or Bank Holidays	Per Ceremony	£655.00	£750.00	£95.00	14.5%
Legal & Governance	Registration	Conversion of CP to Marriage only in an Approved Venue Evenings (17:00 onwards)	Per Ceremony	£675.00	£725.00	£50.00	7.4%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in small office ceremony room (40) Monday- Thursday	Per Ceremony	£330.00	£360.00	£30.00	9.1%

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)
				£	£	£	%
CHIEF EXECUTIVE							
Legal & Governance							
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in small office ceremony room (40) Thursday - Friday	Per Ceremony	£385.00	£420.00	£35.00	9.1%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in small office ceremony room (40) Saturday	Per Ceremony	£440.00	£485.00	£45.00	10.2%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in large Office ceremony room (60-70), Mon Thu	Per Ceremony	£360.00	£395.00	£35.00	9.7%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in large Office ceremony room (60-70), Friday	Per Ceremony	£440.00	£485.00	£45.00	10.2%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in large Office ceremony room (60-70), Saturday	Per Ceremony	£495.00	£545.00	£50.00	10.1%
gal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in an Approved Venue Monday - Wednesday	Per Ceremony	£525.00	£575.00	£50.00	9.5%
D Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in an Approved Venue Thursday - Friday	Per Ceremony	£575.00	£630.00	£55.00	9.6%
Sgal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in an Approved Venue Saturday	Per Ceremony	£625.00	£685.00	£60.00	9.6%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in an Approved Venue Sunday/Public or Bank Holidays	Per Ceremony	£655.00	£750.00	£95.00	14.5%
Legal & Governance	Registration	Welcoming Ceremony (Naming) or Celebration of Marriage/CP in an Approved Venue Evenings (17:00 onwards)	Per Ceremony	£675.00	£725.00	£50.00	7.4%
Legal & Governance	Registration	Private Citizenship ceremony per person	Per Ceremony	£175.00	£210.00	£35.00	20.0%
Legal & Governance	Registration	All certificates 1st class post	Per Certificate	£13.00	£14.50	£1.50	11.5%
Legal & Governance	Registration	Ceremorative certificate	Per Certificate	£10.00	£10.00	£0.00	0.0%
Legal & Governance	Registration	Licence for Approved Premises for Marriage or Civil Partnership includes naming and celebration of marriage (formerly renewal of vows) ceremonies (valid for 3 years)	Per Licence	£1,950.00	£2,000.00	£50.00	2.6%
Legal & Governance	Registration	Licence for Religious Buildings to be Approved Premises for Civil Partnerships	Per Licence	£1,950.00	£2,000.00	£50.00	2.6%
Legal & Governance	Registration	Fee to Request a Review of a Decision regarding Approved Venue/Religious Building Licence	Per Review	£350.00	£350.00	£0.00	0.0%
Legal & Governance	Registration	Amendment to an Existing Approved Premises Licence Administration Fee	Per Amendment	£200.00	£200.00	£0.00	0.0%
Legal & Governance	Registration	Approved Premises Licence Optional Pre-Licencing Visit	Per Visit	£200.00	£200.00	£0.00	0.0%
Legal & Governance	Registration	Proof of Life certification/PD2 form completion for change of name on passport	Per Passport	£25.00	£25.00	£0.00	0.0%

#### Appendix 4 - Fees & Charges 2025-26

#### Fees not prescribed in regulation

Directorate	Service	Description of fee/charge	Charge basis (e.g. per hour, per day etc)	Approved charges 2024/25	2025/26 Proposed charge	Increase / (Decrease)	Increase / (Decrease)	
				£	£	£	%	
CHIEF EXECUTIVE	CHIEF EXECUTIVE							
Legal & Governance								
Legal & Governance	Legal Services	Charge for Copy Documents	Per Document	£86.00	£102.50	£16.50	19.2%	
Legal & Governance	Legal Services	Cost Recovery Blended Hourly Rate	Per Hour	£110.00	£153.50	£43.50	39.5%	
Legal & Governance	Legal Services	Public Sector Blended Hourly Rate	Per Hour	£150.00	£105.30	-£44.70	-29.8%	
Legal & Governance	Legal Services	Standard Blended Hourly Rate	Per Hour	£195.50	£216.50	£21.00	10.7%	

#### **Excluded from the above**

Rents and Service charges

All private sector lease properties and temporary accommodation rents

Commercial Rents and Service charges

Car parking

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MINUTES EXRACT OF THE CABINET MEETING HELD ON 4 FEBRUARY 2025 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### 22 Wiltshire Council Budget 2025/2026 and MTFS Update 2025/26-2027/28

Cllr Nick Botterill, Cabinet Member for Finance, Development Management, and Strategic Planning, presented a report which provided details of the proposed 2025/26 budget and the medium-term financial strategy 2025/26 to 2027/28. The report also set out the Council's Capital Programme 2025/26 to 2031/32, and the Dedicated Schools Grant (DSG) approved by Schools Forum on 23 January 2025.

Cllr Botterill reported that the approach taken in the last two years to set a balanced budget over more than one year of the MTFS period put the council in a good financial position going forward into 2025/26. There are no proposals or reliance on reserves to sustain service delivery for the next financial year and the budget proposals also support setting aside funding for Waste Transformation in the future to ensure delivery of the changes required to meet the environmental and regulatory requirements. He referred to the Local Government Finance Policy Statement 2025 to 2026, which would targeting funding to those councils deemed 'most in need' based on council tax revenue raising abilities and deprivation indicators and that the finance settlement for 2025/26 would be one year only. He was concerned that the one-year funding position brings much uncertainty especially with new grant funding allocations changing for 2025/26 and the basis of this being one where the council is unlikely to see additional funding from government.

The Provisional Local Government Finance Settlement for 2025/26 was announced on 18 December 2024, which provided some indicative funding values for 2025/26 only, with the final Finance Settlement expected early to mid February 2025.

Cabinet noted that the proposed 2025/26 budget ensures that vital services to the residents, businesses and communities of Wiltshire will continue to be provided, as well as delivering on the commitments set out in the Business Plan and will support maximising the opportunities to continue to have funding set aside and not draw from reserves to support future financial risks. It is key that, to be able to continue to deliver on the Business Plan the council has sound and sustainable finances.

Cllr Botterill was pleased that the budget setting proposals deliver a balanced budget without the need to use reserves funding, ensuring that the council is managing its finances in a sustainable way. It is also key that expenditure to sustain services continues so an additional £53m gross pressure has been added into the 2025/26 service budgets to support the delivery of quality services focussed on protecting preventative and early help services, delivering the best outcomes for the residents of Wiltshire. The report also set out the

required increase in Council Tax for 2025/26, the increase in fees and charges and the General Fund reserve balance as part of a reserve strategy to provide improved future financial resilience.

Cabinet members noted that the budget was not sacrificing quality and references were made to Adult Social Care achieving a good rating in a recent inspection by the Care Quality Commission. The Leader explained that the Council was legally required to set a balanced budget and that the Council understood the current financial pressures on residents and therefore propose council tax increases under 5%.

Cllr Graham Wright, Chairman of the Overview and Scrutiny Management Committee, and Cllr Pip Ridout, Chairman of the Financial Planning Task Group reported that the Task Group considered the report on 24 January 2025 and the Committee considered the report on 28 January 2025, where a thorough review was undertaken, and many searching questions were asked about the budget. Reference was made to agenda supplement 2 that was circulated and published before the Cabinet meeting, which contained the minutes and report of the Committee. Cllr Wright confirmed that this document would also be considered by Full Council on 25 February 2025.

#### Resolved:

#### Cabinet recommends to Council:

- a) That a net general fund budget of 2025/26 of £527.420m is approved;
- b) That the Council Tax requirement for the council be set at £368.818m for 2025/26 with a Band D charge of £1,886.99, an increase of £1.56 per week;
- c) That the Wiltshire Council element of the Council Tax be increased in 2025/26 by the following:
  - i. A 2.5% general increase;
  - ii. Plus a levy of 2% to be spent solely on Adult Social Care;
- d) That the Extended Leadership Team be required to meet the revenue budget targets for each service area as set out in Appendix 1 to this report, for the delivery of council services in 2025/26;
- e) That the Extended Leadership Team be required to deliver the revenue savings plans for each service area as set out in Appendix 1 to this report, over the MTFS period 2025/26 to 2027/28;
- f) That the changes in the fees and charges as set out in Appendix 4 are approved;

- g) That the Capital Programme 2025/26 to 2031/32 is approved;
- h) That the Capital Strategy set out in Appendix 2 is approved;
- i) That the Schools Capital Programme 2025/26 to 2030/31 in Appendix 3 is approved, including the proposal recommendations included and set out in that appendix;
- j) That the DSG budget as approved by Schools Forum is ratified;
- k) That the Medium Term Financial Strategy, the forecast balanced budget for 2025/26 financial year and the MTFS 2025/26 to 2027/28 is endorsed.

#### **Cabinet approves:**

- I) the spend against the following grants in Public Health expected in 2025/26:
  - i. the smokefree grant of £0.553m towards enhancing Wiltshire's smoking cessation offer.
  - ii. the Domestic Abuse Safe Accommodation Grant of £1.078m.
  - iii. the Drug and Alcohol Drug and Alcohol Treatment and Recovery Improvement Grant (DATRIG) of £1.215m.

#### Reasons for Decisions:

To enable the Cabinet to recommend to Council a balanced revenue budget for the financial year 2025/26 and to set the level of Council Tax.

To enable effective, transparent decision making and ensure sound financial management as part of the council's overall control environment.

The Cabinet also sets out the final assumptions being used in the budget for growth, inflation, demand for services, the estimated level of income from sales, fees and charges and the level of income estimated from core funding e.g. Page 109Council Tax, Business Rates and government grants as well as the level of reserves held and assessed by the council's Section 151 Officer, as required, to provide future financial resilience.

This provides the council with a MTFS to deliver on the Business Plan priorities and drives long term financial sustainability.





#### **BUDGET BRIEFING SESSIONS**

NOTES OF THE BUDGET BRIEFING SESSION WITH TRADE UNION REPRESENTATIVES HELD ON 29 JANUARY 2025 AT KENNET ROOM-COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### **Present**

#### **Elected Members:**

Cllr Nick Botterill, Cllr Richard Clewer, Cllr Gavin Grant (Virtual), and Cllr Ricky Rogers

#### **Trade Union Representatives:**

Michael Sweetman - UNISON Vanessa McCaffrey - UNISON David McMullen - GMB

#### Officers:

Lizzie Watkin - Corporate Director Resources (S.151 Officer)
Tamsin Kielb - Director HR & OD
Lucy Townsend - Chief Executive
Amanda George - Head of Strategic HR
Alan Sissons – Principal Accountant – Financial Planning (Virtual)
Sarah Rose - Head of Finance - Financial Planning & Deputy S151' (Virtual)

Cllr Richard Clewer, Leader of the Council, and Cllr Nick Botterill, Cabinet Member for Finance, Development Management and Strategic Planning, introduced the draft budget for the trade union representatives.

Detail was provided on the increasing pressure on council finances in particular relating to children's services, SEND, and adult social care, as well as reductions in government grants in particular the rural service delivery grant, service specific inflationary pressures, and continuing need to identify savings to achieve balance budgets. It was stated that Wiltshire Council was in a good financial position compared to many of its neighbouring authorities, and was proposing a 4.5% council tax increase below the maximum available, although strong challenges remained.

Comments and questions were then made by the Union representatives present. It was raised that a lot proposed savings came from staffing savings, cumulatively adding up to a significant amount, and non-replacement of vacant posts. It was asked how posts had been identified and what impact non-replacement would have on workloads. It was stated that in some cases posts had been held as vacant for an extended period and it was not anticipated there would be significant impact on service delivery or workloads, and all other proposals had been assessed for any potential impact. If during future consultation on any proposed staffing changes it emerged there was a greater impact this would need to be taken into account, and any budgeted savings would have to come from other areas. It was also noted that some service areas had seen increases in staff headcount.

It was noted that proposed post reductions were spread across the council without a specific focus on particular departments. It was also queried whether service redesigned, and it was confirmed in some cases this would be necessary. A saving in relation to service redesign in the Registrations team was queried, as a redesign had already taken place. It was stated that savings from some actions might cut across into future financial years.

Queries were raised in relation saving proposals for management and staff vacancy and efficiency reviews, for £0.500m in 2025/26 and £1.000m in 2026/27. It was explained that Corporate Directors would have responsibility for managing their areas to identify appropriate vacancies and managing efficiencies as proposed.

Other matters discussed included the government's increase in employer national insurance contributions and the impact in particular on adult social care providers, with the council working with and supporting providers as much as possible.

Lastly, there was discussion of the Integrated Care Board's awarding of a recent contract, with it stated that was a matter for the ICB itself, although the Integrated Care Partnership met in public and was chaired by the Leader, and he encouraged the representatives to raise the matter there.

At conclusion of the meeting Cllr Clewer thanked the representatives for their attendance and welcomed any further information they wished to raise with him directly.

# NOTES OF THE BUDGET BRIEFING SESSION WITH NON-DOMESTIC RATEPAYERS HELD ON 29 JANUARY 2025 AT KENNET ROOM - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

#### **Present**

#### **Elected Members:**

Cllr Nick Botterill, Cllr Richard Clewer, Cllr Gavin Grant (Virtual), and Cllr Ricky Rogers

#### **Non-Domestic Ratepayers:**

Kez Garner – Trowbridge Chamber of Commerce Deborah Fox – Ann's Trimmings Alice Porter – Business owner in Chippenham Brian Hoon – Winemonkey, Chippenham

#### Officers:

Lizzie Watkin - Corporate Director Resources (S.151 Officer)
Sarah Rose - Head of Finance - Financial Planning & Deputy S151' (Virtual)

Cllr Richard Clewer, Leader of the Council, and Cllr Nick Botterill, Cabinet Member for Finance, Development Management and Strategic Planning, introduced the draft budget for the non-domestic ratepayers in attendance.

Detail was provided on the increasing pressure on council finances in particular relating to children's services, SEND, and adult social care, as well as reductions in government grants in particular the rural service delivery grant, service specific inflationary pressures, and continuing need to identify savings to achieve balance budgets. It was stated that Wiltshire Council was in a good financial position compared to many of its neighbouring authorities, and was proposing a 4.5% council tax increase below the maximum available, although strong challenges remained.

It was explained that whilst the council collected business rates it did not have a role in setting these, which was set by the Valuation Office Agency. Wiltshire Council received back around 49% of the business rates it initially collected, but after special reliefs or top ups to government this was closer to around 35%, though this still represented about £90m and thus a significant proportion of the council's budget.

There was discussion of council programmes aimed to support towns and businesses include the Town's fund, the Wiltshire Marque, encouraging town councils to put on events, promote high street businesses, and other matters. Businesses were encouraged to engage with the council's Economy team.

Questions were raised on how councils could work together more to support businesses, that the council had not received its final settlement from central government and might not until close to or even after setting its budget, and remaining funding to assist with reducing vacant units.

In response to queries it was stated government had been raising the potential of business rate reform for many years, but there was no indication that there would be any changes in the short to medium term

It was confirmed the Wiltshire Local Enterprise Partnership functions had been taken over by Wiltshire Council and that incoming strategic mayoral authorities were expected to take on that level of responsibility or at least have different budget routes to utilise.

There was also discussion of the limited number and impact of chambers of commerce in Wiltshire, and possibility of regional business improvement districts. Comments were also made of the need for sustained support and growth for businesses, rather than one off events.

At the conclusion of discussion the Leader thanked all those present for attending and raising questions.

(Duration of meeting: 4.30 - 5.45 pm)

The Officer who has produced these notes is Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail kieran.elliott@wiltshire.gov.uk

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#### Wiltshire Council

#### Cabinet 4 February 2025

#### Council 25 February 2025

### Report of the Overview and Scrutiny Management Committee on the Draft Budget 2025/26 and Medium-Term Financial Strategy 2025/26-2027/28

#### Purpose of report

1. To report to Full Council a summary of the main issues discussed at the meeting of the Overview and Scrutiny Management Committee held on 28 January 2025.

#### **Background**

- The meeting of the Overview and Scrutiny Management Committee provided an opportunity for non-executive councillors to question the Cabinet Member with responsibility for Finance and the Chief Executives with the Director of Resources and Section 151 Officer on the draft 2025-26 budget and medium-term financial strategy before it is considered at Cabinet on 4 February 2025 and Full Council on 25 February 2025.
- 3. The Leader of the Council, Councillor Richard Clewer and the Cabinet Member for Finance, Councillor Nick Botterill were supported by the Director for Resources and Section 151 Officer, Lizzie Watkin. In addition, Director of Legal & Governance (Monitoring Officer) and other members of the Corporate Leadership Team were present to provide clarification and answers to issues and queries raised by the Committee.
- 4. In addition to the draft Budget and Medium-Term Financial Strategy made available on the Council's website on 21 January 2025 and other public events, a briefing had been arranged on 22 January 2025 open to all elected Members to explain the budget and for technical questions to be answered.

#### 5. Details had included:

- The net general fund budget of 2025/2026 was proposed as £527.420m.
- Council Tax requirement for the Council be set at £368.818m for 2025/26 with a Band D charge of £1,886.99, an increase of £1.56 per week; which would be a 2.5% general increase plus a levy of 2% to be spent solely on Adult Social Care.

#### Main issues raised during questioning and debate

6. This report is divided into sections relating to each of the Select Committee areas as budget proposals and impacts on services were discussed, before opening up to general queries.

#### Financial Planning Task Group

7. The report of the Financial Planning Task Group on the budget proposals was received. The report and its comments would be forwarded for attention at Cabinet and Full Council along with the report of the Overview and Scrutiny Management Committee itself.

#### Children's Select Committee

- 8. Clarity was sought regarding funding from government grants, to which it was noted that there were several grants that although previously assumed to continue were confirmed in both the policy statement and provisional settlement as no longer continuing. These grants were listed within the budget papers with the total amount of grant funding lost representing a figure of circa £8million.
- 9. It was questioned how the placement sufficiency programme of work would achieve £0.350m savings, to which it was stated that work was taking place at director level in regard to operational work within commissioning that would aim to take opportunities to step down placements from high to low costs over a broad spectrum of work across placement management.
- 10. The national shortage of foster carers was discussed and how Wiltshire would be looking to improve on this situation with in-house foster carers which had previously been difficult to recruit. Detail was provided that this was being addressed at a national level through initiatives as well as regionally and that there was confidence in recruiting given a positive track record and reputation.
- 11. It was suggested that four qualified social worker posts were being removed and case reviews would be carried out by less qualified staff (family key workers) to which assurance was provided that due to having a good history in early intervention and prevention, through good management of caseloads, these posts could be safely removed. It was also outlined that family key workers would work with people who had a lower risk but would not receive less supervision because of this.
- 12. Reference was made to savings on SEND transport 'across MTFS', with the capacity to deliver the plans questioned, to which assurance was provided that it was believed that capacity was there and that this was not a new saving but a continuation of the MTFS. Detail was provided that investment had been made in route planning technology as well as staff training to consider routes and fleet. Further savings for years two and three would be evidence led; therefore, work was being undertaken towards this.
- 13. Assurance was provided that there was a high degree of confidence in the council being able to attract an additional £500K in health funding, with an income of £500k already realised this year working with the ICB for children with complex needs and medical diagnoses. Furthermore, work was being undertaken with two other local

authorities within the ICB to build a solid funding footprint with confidence that income could be increased in future years.

- 14. Detail was sought regarding £0.319m savings identified through staffing review and deletion of vacant posts, to which it was noted that this would be within the social work teams, with caseloads to be reviewed with some assessment work to be moved into the safeguarding and support teams. It was stated that the deletions would be of vacant posts or if through natural wastage through the year rather than redundancy.
- 15. Feedback was provided that it would be positive for a savings section to be included within the main report beside each subject.
- 16. The impact of savings on the delivery of children's services was questioned, to which assurance was provided that savings would not be accepted if they were not considered to be deliverable, with each individual saving assessed by officers also through a lens of equality and accumulative impact.

#### Health Select Committee

- 17. Concern was raised about whether the budget would fully cover the pressures on staff costs of providers to which it was noted that the council was aware of the potential impact that the increased employer national insurance contribution and other financial pressures may have on providers and the council would continue to work with them in partnership to sustain the market. Additionally, it was noted that there was also some risk in the contractually inflationary increases across all service areas and a budget was held centrally to help mitigate where services are not able to manage such pressure if they present during the 2025/26 financial year that cannot be contained within existing budgets.
- 18. It was suggested whether there could be clear and literal explanations of spending lines that would be reduced by savings, particularly proposed savings over £0.500m or £1m. It was noted that savings proposal descriptions have an over all approach however it is not always possible to be literal and specific as some decisions may relate to statutory responsibilities under the Care Act.
- 19. Regarding the projected saving £1.4m from 'Learning disabilities/Mental Health Placements' it was questioned whether this would mean seeking to support more people living independently and spending less on residential care. It was clarified that the service was confident that this was achievable and that prudent figures had been put forward based on previous experience. This considered success in previous years of moving out of county placements which had been boosted by purchasing properties within Wiltshire.
- 20. The projected saving of £1.835m from "Undertake Strength Based Reviews in Whole Life pathway with a focus on Learning Disability services to deliver individual outcomes maximise community-based opportunities and reduce reliance on formal care and support" was discussed. It was suggested that, through regular adult care reviews, the council would be able to ensure that the level of care for individual needs

was correct and would identify potential savings, for example, moving from residential to community care and improving people's homes through preventative services.

- 21. It was questioned whether the council was aware of how much providers were paying shareholders and whether this was factored into the procurement process, to which it was clarified that collaboration with providers takes place with a model used, however, there was no obligation for providers to provide data and that some also have charitable status and therefore do not have shareholders.
- 22. It was asked whether in future budgets and financial performance reports it would be possible to see detail concerning the spread of spend across the directorate so that the committee can better understand where the pressures of demand and savings are coming from. It was stated that improvements were being made to finance reporting systems, which would allow for detail to be reported more effectively.
- 23. It was questioned whether the projected saving of £0.180m was ambitious enough for the increased use of the shared lives programme, to which it was stated that the council was keen to promote shared lives further and that the service had expanded from 36 to 51 placements and that further expansion would be dependent on recruiting shared lives families. It was suggested that there may be opportunities for this in future financial years however a prudent approach was being taken for the coming year.
- 24. It was questioned whether there was elements in the budget to help speed up discharge from hospital to efficient and effective reablement to which it was noted that there were initiatives within the budget as well as discharging funding which had been received.
- 25. Further detail was requested in regard to capital investments in property, to which it was noted that the council had agreed to purchase 15 supported living properties and had completed on 5 of these with work looking to progress into further financial years.

#### **Environment Select Committee**

- 26. Assurance was provided that there was enough capacity within the Climate Team to cover its remit and demands in the budget and that the Climate Team had additional resources added in 24/25 budget and the council always looked to include staffing needs in external bids such as the Warm Homes Grant to ensure it have the resources needed to deliver. It was also noted that responding to the climate emergency was a whole council responsibility.
- 27. It was noted that currently data was not available in relation to the total capital budget for programmes that are reducing the council and county's carbon footprint, however, the Environment Select Committee would be informed as work developed with the capital project and finance teams.
- 28. Clarification was provided regarding government funding to maintain Wiltshire highways for the upcoming and future financial years, with it stated that the Highways

Maintenance Block would be £23.6m for 2025/26 and that funding for 2026/27 was currently unknown with no further update on the Integrated Transport Block at this time. Additional local funding already approved and being spent was £22m (prevention programme).

- 29. Detail was provided on the income generated by Highways & Transport services through carparking and street works with it noted that for 2024/25 the forecast income from Permits was £574,000, but this was ring fenced to pay for the service including staff 2024/25 forecast income for other street works activities is £1.927m. Further information on fees and charges could be found via the following report: <a href="https://example.com/appendix4-reports-to-the-
- 30. Clarity was provided that the ongoing costs of providing car parking services were covered by income and that the extent of the service was determined by income received; additional funding had been provided for cleansing and maintenance in previous and current year. Additional costs would be considered as part of the forthcoming parking review to ensure assets and service meet the council Business Plan objectives
- 31. It was questioned whether the New Burdens budget would be used in 2025/26 to prepare for the implementation of food waste collection to which it was stated that Waste Services would be working through the detail as to how food waste would be collected in Wiltshire and that the capital funding received had been set aside for that purpose for collections to start in 2027. However, details of the revenue element promised as part of new burden funding for these new mandatory collections was still awaited.
- 32. It was questioned whether there would be Asset Transfer Plans in place for towns and parishes in addition to Westbury, to which it was stated that other discussions had been ongoing however with elections taking place in May it would not be prudent to allocate savings into such an item until the conclusion of elections.
- 33. Clarity was sought regarding the current trend on car parking charges in terms of patterns of use and occupancy of car parks, to which detail was provided that off Street (car parks) parking charges had remained unchanged for three years, also time limited stays had remained unchanged. Only a few fees and charges had changed, with minimal impact on income. Additionally, a Parking Review was being undertaken, aligned to the fourth Local Transport Plan for Wiltshire (LTP4), and it was intended this would be subject to consultation later in the year. It is challenging recording occupancy as there are many different types of users, many of which do not pay (for example, customers in St Stephens, Trowbridge and staff). Furthermore, whilst the council knows how many season tickets are sold per car park, it was not known whether these are always used, although, there was a need to ensure these spaces are available, as they are paid for. As part of the Parking Review, the council would be collecting additional data where possible and the objective of parking strategy would be to ensure appropriate balance for all users.

34. Reference was made to the ending of the £1m Wiltshire Towns Programme, with it questioned whether there would be an alternative source available from Government or elsewhere to sustain this funding, to which it was noted that Government had not yet announced any funding in this area beyond the next financial year, however, this could be something crystalised through devolution.

#### Overview and Scrutiny Management Committee

- 35. A suggestion was made that it would be positive to include a contents page for easy reference within the budget pack.
- 36. It was clarified that 5% of the core spend goes towards running the council—not just toward running elections—with it noted that this would include income from parishes and towns towards the costs. Furthermore, that the PCC election costs were funded through a government grant.
- 37. Clarity was provided in relation to the Chief Executive's Budget with it outlined that the capital financing costs of the schemes were included in the capital programme that are funded by borrowing and would include both the technical financing in lieu of principal debt repayment as well as interest cost.
- 38. Reference was made to the Business Plan Programme, with it outlined that the figure of £2.265m related to the reinstatement of the Transformation Team. Further clarity was outlined that by the end the 2025/26-year, transformation would have a projected closing balance of £2.618m from the general fund reserve, however by the close of 2027/28 the team would be fully funded by the base budget.
- 39. Officers provided clarity on the Collection Fund referenced within the budget papers, with it noted that Wiltshire Council was the administering authority for business rates and council tax and that deficits and surpluses accrue when the actual performance does not align with the assumptions of the previous year for the Fund.
- 40. Assurance was sought regarding the Capital Investment Programme Board, to which it was suggested that the Board was having a positive output with assurance being provided by the Board and that it could act as a beneficial management tool across schemes allowing for cross scheme scrutiny in order to present learning opportunities.

#### Conclusion

- 41. To note the Draft Wiltshire Council budget for 2025-26 and Medium-Term Financial Strategy for 2025-26 to 2027-28 and to refer the comments of the Committee and the report of the Financial Planning Task Group to Cabinet and Full Council for consideration on 4 February and 25 February respectively.
- 42. To support the Financial Planning Task Group's ongoing monitoring of the delivery of the budget and the development of the budget for 2026-27.

**Councillor Graham Wright, Chairman of the Overview and Scrutiny Management Committee** 

Report Author: Ben Fielding, Senior Democratic Services Officer,

benjamin.fielding@wiltshire.gov.uk

Report Date: 3 February 2025



#### Wiltshire Council

#### **Overview and Scrutiny Management Committee**

#### 13 February 2025

#### Meeting of the Overview and Scrutiny Management Committee Report on Proposed Amendments for the 2025/26 Budget

#### **Purpose of report**

 To report to the Overview and Scrutiny Management Committee the proposed amendments from Cllr Jon Hubbard to the budget recommended to Cabinet on 4 February 2025 for the committee to appraise and raise any comments to Full Council.

#### **Background**

- 2. This meeting of the Overview and Scrutiny Management Committee provides an opportunity for non-executive councillors to question Cllr Jon Hubbard, on the proposed amendments before the budget is considered by Full Council on 25 February 2025.
- 3. The Member proposal is an amendment to the proposed Cabinet budget, as set out as follows:
  - To introduce free swimming for children and young people during school holidays across Council run facilities within Wiltshire. This covers all school holidays including half term breaks.
- 4. The above proposal has the following impact on the 2025/26 base budget:

Proposal	Impact £m
To introduce free swimming for children and young people during school holidays across Council run facilities within Wiltshire.	
2025/26 pressure of proposal	0.406
2026/27 pressure of proposal	0.429
2027/28 pressure of proposal	0.453
Total pressure across MTFS	1.288
Funding Proposal of Pressure	
Increase Council Tax by 0.115% in 2025/26 resulting in an impact of £1.288m over the MTFS period	1.288

5. The proposal has the effect of increasing budgets in the 2025/26 financial year which results in a revenue pressure in every year of the MTFS, with proposals for funding this pressure set out in the table above.

6. The impact of the funding of the proposal has the effect increasing Council Tax in 2025/26. This has a cumulative positive impact on the Council Tax income for the 2026/27 and 2027/28 financial years.

#### **S.151 Officer Comments**

- 7. The proposal has been reviewed and an estimated assessment of the overall financial impact of the proposal indicates a loss of income and additional running costs, which are based on the current usage.
- 8. The pressure may not be as high as set out above as the assumption used is based on all those paying taking the option of free swimming, which they may not. There is however a risk of further loss on income from Junior memberships and Swim School memberships, but this is not deemed significant and estimates on running costs are based on a prudent basis which allows for additional income losses.
- 9. Funding this proposal by additional council tax income, which can be raised and falls within the limits of allowable increases set by government (up to 3% for basic council tax) provides greater certainty of income from local taxation in future years.
- 10. Year on year there will be increased pressure from the proposal due to inflationary increases on running costs and additional losses from increased charges but this is at least equally off-set by the additional council tax that will be raised in future years due to the cumulative impact of increased council tax in 2025/26.
- 11. This amendment therefore balances and does not impact on the 2025/26 base budget proposed in the original paper to Cabinet in a detrimental way and in doing so meets the financial test for an amendment to the budget to be considered by Full Council.

#### **Monitoring Officer Comments**

12. Subject to the views of the Chairman of the Council and subject to this proposal being moved in accordance with the Rules of Procedure in Part 4 of the Constitution, this is an appropriate amendment within the meaning of Rule 20.6. There are no other legal implications.

#### **Head of Paid Service Comments**

13. As Head of Paid Service, I can confirm that officers have provided independent advice. We are aware of the full details of the amendments, and they are policy amendments in nature.

#### Conclusion

14. Overview and Scrutiny Management Committee are asked to consider the proposed amendments to the financial plan 2025/26 and inform Full Council on 25 February.

#### Wiltshire Council

#### **Overview and Scrutiny Management Committee**

#### 13 February 2025

#### Meeting of the Overview and Scrutiny Management Committee Report on Proposed Amendments for the 2025/26 Budget

#### **Purpose of report**

 To report to the Overview and Scrutiny Management Committee the proposed amendments from Cllr Jon Hubbard to the budget recommended to Cabinet on 4 February 2025 for the committee to appraise and raise any comments to Full Council.

#### **Background**

- 2. This meeting of the Overview and Scrutiny Management Committee provides an opportunity for non-executive councillors to question Cllr Jon Hubbard, on the proposed amendments before the budget is considered by Full Council on 25 February 2025.
- 3. The Member proposal is an amendment to the proposed Cabinet budget, as set out as follows:
  - A permanent increase in Wiltshire Reablement Services. This would deliver increased capacity to work with individuals to improve levels of independence and quality of life and reduce reliance of funded long term care.
- 4. The above proposal has the following impact on the 2025/26 base budget:

Proposal	Impact £m
A permanent increase in Wiltshire Reablement Services. This would deliver increased capacity to work with individuals to improve levels of independence and quality of life and reduce reliance of funded long term care.	
2025/26 pressure of proposal	1.324
2026/27 pressure of proposal	1.400
2027/28 pressure of proposal	1.477
Total pressure across MTFS	4.201
Funding Proposal of Pressure	
Increase Council Tax by 0.375% in 2025/26 resulting in an impact of £4.201m over the MTFS period	4.201

5. The proposal has the effect of increasing budgets in the 2025/26 financial year which results in a revenue pressure in every year of the MTFS, with proposals for funding this pressure set out in the table above.

6. The impact of the funding of the proposal has the effect increasing Council Tax in 2025/26. This has a cumulative positive impact on the Council Tax income for the 2026/27 and 2027/28 financial years.

#### **S.151 Officer Comments**

- 7. The proposal has been costed and is set out in the figures above.
- 8. Funding this proposal by additional council tax income, which can be raised and falls within the limits of allowable increases set by government (up to 3% for basic council tax) provides greater certainty of income from local taxation in future years.
- 9. Year on year there will be increased pressure from the proposal due to inflationary increases on staffing and other associated costs, but this is at least equally off-set by the additional council tax that will be raised in future years due to the cumulative impact of increased council tax in 2025/26.
- 10. This amendment therefore balances and does not impact on the 2025/26 base budget proposed in the original paper to Cabinet in a detrimental way and in doing so meets the financial test for an amendment to the budget to be considered by Full Council.

#### **Monitoring Officer Comments**

11. Subject to the views of the Chairman of the Council and subject to this proposal being moved in accordance with the Rules of Procedure in Part 4 of the Constitution, this is an appropriate amendment within the meaning of Rule 20.6. There are no other legal implications.

#### **Head of Paid Service Comments**

12. As Head of Paid Service, I can confirm that officers have provided independent advice. We are aware of the full details of the amendments, and they are policy amendments in nature.

#### Conclusion

13. Overview and Scrutiny Management Committee are asked to consider the proposed amendments to the financial plan 2025/26 and inform Full Council on 25 February 2025.

### Agenda Item 9

#### Wiltshire Council

#### **Full Council**

#### **25 February 2025**

### Housing Revenue Account (HRA) Budget Setting 2025/26 including Dwelling Rent Setting 2025/26 and 30-Year Business Plan Review

#### **Executive Summary**

The purpose of this report is to agree the Housing Revenue Account (HRA) Business Plan, Budget and associated housing funding decisions.

One of the main decisions that the Council must consider is the level of rent charges and the increase for our Council tenants for the forthcoming year as it forms the financial envelope for the HRA Business Plan against which the costs of delivering our priorities will need to operate within.

There is a clear and ongoing need to ensure that our HRA Business Plan retains a focus on housing quality and compliance responding to the regulatory environment in our existing homes, a commitment to decarbonise our existing homes and make best use of our stock for our most vulnerable residents. We continue to prioritise growth by delivering many new affordable homes.

As such this report provides updates on the proposed Housing Revenue Account (HRA) Annual Revenue Budget and Capital Programme for 2025/26, including the proposed Rent Setting for 2025/26. This report also provides an update on the 30-Year Business Plan.

The new business plan model demonstrates a sustainable long-term HRA that supports the Council's investment plans. It incorporates updates to Government regulations on Right to Buy (RTB) receipts, forecasts for the impact of the latest Government consultations on rent changes, and the future of RTB. However the level of debt / borrowing in the plan with the inclusion of all anticipated investment has grown substantially from previous iterations. This heightens risk and pressure on the business.

The plan includes updated HRA forecasts and a reprofiled Council House Build Programme (CHBP) to meet prudential targets for the management of debt. It highlights potential areas of risk and outlines strategies to mitigate the impact of additional costs.

The debt profile of the new plan has changed from an exclusive repayment model to having greater emphasis on re-financing our debt in the first half of the plan. Both peak borrowing and long-term and residual debt are both substantially higher. This model is sustainable, aligns with other authorities, and maintains minimum balances on reserves.

Whilst the proposals included in this report enable the Council to set a balanced budget for the HRA for 2025/26 which is the immediate priority, an in year review will be carried out where options to reduce the high levels of debt will be explored. This will include options around the number and ratio of land led and acquisition schemes in the business plan. This further review will include more detailed scenario analysis to enhance that undertaken and presented in this report.

Scenario analysis of rent increase options from the social housing rents consultation has been conducted to assess the robustness of the plan.

This HRA annual budget report will form part of the budget setting reports at Cabinet and Full Council but will remain separate from the General Fund medium-term financial strategy (MTFS) – providing a more detailed report for members with an aim of greater information and transparency.

#### **Proposals**

#### That Council:

- a) Note the draft budget estimates and proposals.
- b) Approve the HRA Annual Revenue Budget for 2025/26 as described in the report and Appendix 1, subject to an in year review.
- c) Approve the increase of 2.7% (CPI+1%) to Dwelling Rents and Garage Rents for 2025/26
- d) Approve the HRA Capital Programme for 2025/26 as described in the report and Appendix 2, including the allocation of an additional £99m for the Council House Build Programme.
- e) Note the reviewed and updated assumptions in the HRA 30-Year Business Plan as detailed in the report.
- f) Approve authority to receive bespoke or targeted grants (if awarded) during the year.

#### **Reason for Proposals**

To enable the Cabinet to recommend to Council a balanced budget (capital and revenue) for the HRA for 2025/26, and in so doing continue to provide high quality services to tenants and investment in their homes.

To enable effective, transparent decision making and ensure sound financial management of the HRA as part of the council's overall control environment.

James Barrah - Director of Assets Lizzie Watkin - Corporate Director for Resources (S151 Officer)

#### Wiltshire Council

#### **Full Council**

#### **25 February 2025**

### Housing Revenue Account (HRA) Budget Setting 2025/26 including Dwelling Rent Setting 2025/26 and 30-Year Business Plan Review

#### **Purpose of Report**

- 1. This report updates Members on the proposed Housing Revenue Account (HRA) Annual Revenue Budget (including rent setting) and Capital Programme for 2025/26. Additionally, the report also provides an update on the 30-Year Business Plan Review.
- 2. The proposals included in this report will enable the Council to set a balanced budget for the HRA for 2025/26. A balanced budget is crucial for effective financial management and will allow the service to allocate resources efficiently and meet financial obligations while providing necessary services.

#### Relevance to the Council's Business Plan

- 3. The balancing of the HRA, budgeted capital programme and business plan review contribute to effective decision making and the alignment of resources and financial performance to the Council's priorities and objectives as laid down in the Business Plan.
- 4. The plan supports the Council's target to deliver 1000 new affordable homes. The Council House Build Programme has been re-phased and extended from being a 10-year programme to a 17-year programme to ensure the business plan remains affordable and is now scheduled to run until 2038/39.
- 5. Since the introduction of the 1000 homes target, the business plan and the environment in which it operates has seen fundamental change. For example, substantial shifts in global economics and supply chains, covid, substantial cost inflation, higher interest rates, a new regulatory agenda for the housing sector and many other challenges. We are fortunate that considering all of these challenges the plan is still able to support the aspiration for 1000 new homes, however the programme will just take longer to deliver.

#### **Background including history**

- 6. The HRA is a ring-fenced account that is held within the General Fund. The Council acts as the Landlord. Revenues are generated primarily from rents and other associated income and are used to cover costs associated with managing and maintaining a housing stock of approximately 5,300 properties. This includes expenses such as property maintenance, repairs, improvements, and other related tenant services.
- 7. In April 2012, in accordance with the Localism Act 2011, the HRA (under the administration of Wiltshire Council) transitioned from a national subsidy system where it had to make an annual payment to Central Government to become 'self-financing'. This change allowed the Council to keep all rental income which was then used to

cover the costs of managing and maintaining the housing stock, including expenses for repairs, improvements, as well as interest and debt repayments. As part of the self-financing agreement, the Government received a one-time capital payment of £118.810m from the Council which was funded from borrowing.

- 8. To effectively utilise the newfound autonomy of the HRA under the self-financing system, the first comprehensive 30-Year Business Plan (2012-2042) was implemented. This plan outlined the Council's overarching goals and objectives for the Housing Service, providing a roadmap for addressing both risks and opportunities. This plan is updated on an annual basis.
- 9. The current capital programme consists of the CHBP with future expenditure of £250.8m to complete the delivery of 1,000 homes along with the works planned for existing stock of £522.7m over 30 years. The plan requires additional borrowing of £288m until 2042/43 after which the level of debt starts to go down. The plan demonstrates that using a combination of resources from the Major Repairs Reserve (MRR) and from Revenue, the HRA can finance the additional borrowing required and fully repay this borrowing (as well as the outstanding self-financing loans) over the course of the plan, while retaining a balance on the HRA at the end of the plan of £74m. This provides a sustainable business model, against which capital plans can be continually monitored. business model, against which capital plans are continually monitored.
- 10. The HRA continues to face many risks and issues, many of which could be significant, in terms of financial impact to the business plan. These risks and issues are more significant for us as we proactively drive forward substantial investment in social housing development, with both existing schemes and more schemes planned.
- 11. The HRA 30-Year Business Plan is annually updated during the budget setting process to protect against adverse impacts on the organisation's ongoing concerns due to changing assumptions. This review ensures the continued viability and affordability of the HRA, providing flexibility in delivery to enhance the financial position. The Business Plan has been revised to incorporate the budget estimates for 2025/26 and to account for the updated assumptions related to the prevailing economic conditions. The purpose of the business model is to consider at a strategic level the impact of plans and forecasts on the HRA over a 30-year period from 2025/26.

#### Main Considerations for the Council

#### <u>Assumptions</u>

12. <u>Stock numbers on 1 April 2024</u>, the Council owned 5,359 tenanted units (including 48 shared ownership and 276 at affordable rent). Projected Stock numbers are shown in the table below which shows that stock lost through RTB is more than matched by the new provision from the CHBP and in the long-term reaches the target.



- 13. Inflation There are two measures of inflation included in the business plan: CPI which is used for rent calculations; and the Retail Price Index (RPI) which is used for other income and expenditure. In accordance with the September 2024 indices, RPI for 2025/26 is 2.7% and CPI is 1.7%. For later years, in line with the Government target, CPI is assumed at 2% and RPI at 3%.
- 14. Rents and Other Income Social rent policy is set out in the Government's policy statement. A direction is provided to the Regulator of Social Housing to regulate the policy through application of the Rent Standard. The regulation required a ceiling to be placed on rents limited to an increase of 7% for 2023/24 due to the exceptional inflation rates and for 2024/25 onwards reverted to the previous limit on rent increases of CPI + 1%. The Government opened a consultation regarding the ongoing policy for rent increases in 2024/25. The Local Government Association published its response to the consultation on 24<sup>th</sup> December and further guidance is awaited. In the absence of any further advice the Council have assumed that future rent increases will be limited at CPI plus 1% only for the next 10-years reverting to CPI thereafter. Detailed rent modelling has been undertaken to support the inputs to the busin ess plan. Should the government apply additional constraints then other options will need to be explored to ensure the plan remains viable.
- 15. Although not a regulatory requirement, constraining affordable rents (which apply to new properties supported by Government funding) at the level of the Local Housing Allowance (LHA) will be considered as part of the ongoing business planning work. This would only affect a small number of tenants. LHA rates were planned to increase to the 30th percentile of local market rents from April 2025. However, this has changed following the change of Government, and in a written statement to Parliament, the Work and Pensions Secretary, Liz Kendall informed the House that local housing allowance rates for 2025/26 will be maintained at 2024/25 levels, following their increase in April 2024.
- 16. Right to Buy (RTB) On 30 July 2024, the Government initiated a review of the increased RTB discounts introduced in 2012. Alongside the Chancellor's Autumn Budget Statement, the Government published a policy paper titled 'A Review of the Increased Right to Buy Discounts Introduced in 2012'. To support this paper, secondary legislation was introduced, amending the maximum allowable discounts (SI 2024/1073), effective from 21 November 2024. The national maximum discount for RTB sales, previously £102,000, has been replaced with regional discount levels intended to better reflect local housing markets. In Wiltshire, which is part of the Southwest, the maximum allowable discount for RTB sales will be £30,000 from 21 November. The changes also include an increase in the cost floor period from 15 to 30 years. The cost floor limits RTB property discounts to ensure that the purchase price

does not fall below the amount spent on building, buying, repairing, or maintaining the property during that period. Additionally, the Treasury will no longer receive its share of the receipts generated.

- 17. RTB sales of 43 for 2025/26 is forecast based on the latest sales data, with an estimated 5 RTB sales per year thereafter. The service experienced a spike in applications following the Autumn Budget statement and consequently the estimated number of RTB sales for 2025/26 includes 38 sales that are not expected to complete before the end of 2024/25.
- 18. Detailed analysis of the implications for the Council is modelled separately. This modelling supports the Government return required for pooling of receipts and the apportionment of forecast receipts (arising from future sales), with the outputs being reconciled and applied to the business plan. More details of the rules for dealing with RTB receipts are shown below under 'Usable RTB Receipts'.
- 19. <u>Management and Maintenance</u> All inputs are based on the latest estimates. Management (and service) and maintenance costs are assumed to increase in line with CPI. Management and maintenance costs are assumed to vary with stock changes.
- 20. Council House Build Programme The Council House Build Programme has been reassessed to ensure the continued viability of the HRA business plan and as a result a revised development produced. Scheme costs total £294m of which £44.3m has happened in previous years. The current capital approval was £195m to deliver 1,000 homes, yet with the increase in build costs, house prices and inflation the ability to deliver the quantum of homes is not possible within the original timeframe. A reprofiled programme ensures that 1,000 homes can be delivered and required a further capital allocation of £99m. The programme will remain a blend of land-led and acquisitions (s106 and market purchases) although the impact of build costs likely to push us more towards acquisition, with an expected split of 40% land-led and 60% acquisitions. Some of the land-led scheme will enhance the HRA's Sheltered Housing stock with several new sites being developed.
- 21. Other Capital Expenditure Provision is also made in the business plan for planned repairs and renewals for the Council's existing stock, which is linked to stock numbers, decarbonisation works and IT upgrades. Increases are assumed to be in line with RPI.
- 22. Interest rate projections have been provided by Link Asset Services and represent their latest forecasts. Internal borrowing has supported the HRA for 2024/25 financial year based on the 3 Month Sterling Overnight Index Average (SONIA). The 3 Month SONIA rate provides an independent, industry recognised rate, that removes any short-term variations in internal treasury management decisions. From April 2025, external borrowing will be required. Despite the availability of concessionary interest rates for the HRA from the PWLB, the amount of capital required and rates available for borrowing have grown significantly. Interest rates have been applied to the business plan based on the Council's latest projections, which have a significant impact on the business plan. Rates are applied (based on 25-year borrowing) at 4.5% in 2024/25, 3.8% in 2025/26 and 3.6% thereafter. These rates assume that the concessionary rate of 60 basis points below the standard PWLB rates and 0.4% below the certainty rates currently available to the HRA continue. The most recent

- announcement from the Treasury extended the availability of the concessionary rate until June 2025.
- 23. Reserves The Council has included a minimum revenue balance of £1m throughout the business plan. Where there is a shortfall in resources to meet the capital plans, revenue resources can be used if the balance on the revenue account does not fall below this level. However, to ensure that the level of borrowing required for the capital programme is affordable, it is necessary to maintain revenue balances at higher levels (to meet the financing costs of new borrowing). The approach adopted by the Council to resource the capital programme is shown below.

#### **Resourcing the Capital Programme**

Useable RTB Receipts and Retained (1-4-1) Receipts.

- 24. The rules governing the distribution and use of RTB capital receipts are complex. Receipts fund transaction costs, debt linked to each sale less that assumed in the self-financing settlement and to reflect the split of receipts between the Government and the Council that applied before the re-invigoration of RTB in April 2012. Residual receipts, subject to Government agreement, can be retained as 1-4-1 receipts to support a percentage of eligible expenditure on new home development and acquisition.
- 25. A retention agreement between the Government and the Council outlines the conditions for accessing retained (1-4-1) receipts, which would otherwise be paid to the Government. The latest agreement allows local authorities to use 100% of retained RTB receipts to fund replacement affordable housing for 2024/25 and 2025/26 (up from 50%). It is unclear if a cap will apply from 2026/27 onwards, with confirmation expected after the government consultation closes on 15th January 2025.
- 26. RTB receipts can be used alongside S106 contributions. If not used within five years, they must be returned to the Government with 4% compound interest above the Bank of England base rate. Under special arrangements for 2022/23 and 2023/24, the Government's share of receipts is added to the retained (1-4-1) receipts.
- 27. Grant is included for CHBP schemes, where agreed as part of the Homes England programme, that the Council is currently accessing for some developments.
- 28. Other Receipts includes any other HRA (non-schedule) receipts or non HRA receipts available to support capital expenditure, for example from Shared Ownership sales.
- 29. <u>Major Repairs Reserve</u> the HRA makes a provision by way of a credit to an MRR of an amount in respect of depreciation applied to the stock. This MRR is used to fund capital investment in refurbishment components such as kitchens, roofs etc. The estimate of depreciation of the HRA stock has been recalculated and results in a reduced contribution to MRR and increased flexibility within the HRA.
- 30. Revenue Contribution to Capital Outlay (RCCO) To maximise the availability of revenue resources to support additional borrowing it has been assumed that no revenue contributions will be made to support the capital programme until year 20 (2043/44), by which time most of the current CHBP costs will have been incurred. After this time revenue balances can be used if this does not result in balances on the HRA falling below £1m.

31. Borrowing the Council borrowed £118.8m in 2012 for the original self-financing settlement, with phased maturities until 2036/37. The opening balance for these loans in 2024/25 is £102m. These are PWLB fixed-maturity loans with interest rates specific to each loan. Borrowing continues while revenue contributions are set to zero and increases the peak debt to £394.5m at year 2042/43. Any shortfalls in resources are assumed to be met from additional borrowing using PWLB fixed maturity loans. Interest rate projections are as outlined in paragraph 22. When a loan matures, it is assumed that the loan will be refinanced until there are sufficient resources available in the plan to provide for repayment.

### Changes to the Previous Approved Business Plan Summary

- 32. The following table shows the changes to the annual opening balance on the HRA from the previous approved version to the latest base model. Many of the changes will impact the financing of the plan and the interest on balances. For clarity the table summarises all the financing and interest changes together. More details for each of the changes are provided in the sections below the table.
- 33. The most significant movements to the plan relate to extending the CHBP to 2038/39, reduction to the depreciation charge which has increased opening and ongoing revenue balances, additional rental income from revised assumptions for annual increase to CPI + 1%, updated budget forecasts which include significant increases in the base budget for repairs costs.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.30	2030.31	2031.32	2032.33	2033.34
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Baseline Balance	3,740	7,168	9,734	11,611	12,816	13,681	14,115	6,219	6,476	7,067
CHBP Update	0	(288)	(430)	7	1,157	2,480	3,962	5,520	7,972	10,344
Existing Stock Capital	0	47	187	421	742	1,145	1,645	2,273	2,974	3,500
RTB	0	105	310	517	708	872	1,010	788	31	(809)
Balances and Depn.	6,502	12,069	15,215	18,349	21,686	25,189	28,830	32,591	36,483	40,461
2025/26 Inflation	0	(225)	(213)	(198)	(181)	(162)	(139)	(115)	(87)	(57)
Rents	0	30	264	840	1,811	3,220	5,099	7,531	10,451	13,900
Budget Updates	0	(5,892)	(10,654)	(15,316)	(20,176)	(24,978)	(29,837)	(25,605)	(30,817)	(36,025)
<b>Business Plan 2024</b>	10,242	13,014	14,413	16,231	18,562	21,447	24,685	29,203	33,483	38,382

#### Changes and impact of changes

- 34. This section outlines the changes and impact on the business plan.
- 35. The Council House Build Programme (CHBP) has been extended by 7 years to 2038/39, (previously 2031/32), with future expenditure of £250.8m, bring the total CHBP cost to £295m, to complete the delivery of 1,000 homes. The programme has been extended to spread the borrowing over a longer period and to reduce the borrowing requirements in the shorter term to support the Council strategy for prudential debt management. It should be noted however that extending the phasing of the CHBP does reduce the net rental income as properties are added later in the business plan. Reprofiling increases revenue balances by approximately £10m over the next ten years. The numbers of stock for the new plan reflect the latest budget assumptions and generate a lower rental income at the start of the plan.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	000 <del>2</del>	000£	000 <del>2</del>	000 <del>2</del>	000 <del>2</del>	000 <del>2</del>				
CHBP Update	0	(288)	(430)	7	1,157	2,480	3,962	5,520	7,972	10,344

36. The existing Planned Maintenance programme covers works to existing Council homes and totals £522.7m over 30 years. This is more than previously reported and the spend has been updated with a marginal reduction to costs in 2032/33. Consequently, balances have increased by £3.5m over the period.

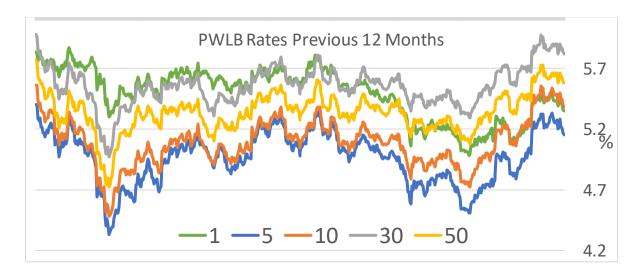
	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	000£	000£	000 <del>2</del>	000 <del>2</del>	000£	000£	000 <del>2</del>	£000	000 <del>2</del>	000 <del>2</del>
Existing Stock Capital	0	47	187	421	742	1.145	1.645	2.273	2,974	3,500

- 37. There have been significant changes to RTB assumptions since December 2023. Overall, these changes reduce the balance by £0.8m over 10 years. The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 (as revised) set out the treatment of Right to Buy (RTB) receipts as outlined in paragraphs 16-18. These changes result in an increase to balances of £1.2m.
- 38. Consultation on the next stage of reforming RTB was issued on 15 November 2024 and closes on 15 January 2025. It poses questions over the discounts available to RTB applicants, the timeframe for repayment of discounts and mechanisms for calculating and using receipts.
- 39. The effect of the changes to RTB regulations to date have been factored in the business plan model and increase the resources available to support plans in the short term (through the availability of the Treasury share). The latest consultation raises questions but does not make any proposed changes so no further changes have been assumed.
- 40. The consequences of changes to RTB discounts on future sales are unknown at this stage but assumptions have been made about the forecast sales based on the latest RTB application figures. Initially additional sales increase resources but forecast reductions in sales then reduce resources and consequently revenue balances. The changes result in additional sales of 38 (resulting from a surge in applications in 2024/25 following the budget announcement). Sales are then estimated to drop to 5 per annum from 2025/26. It is estimated that the reduction in sales will result in a reduction in balances of £2m as shown on the table below.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	000 <del>2</del>	000£								
Changes to Policy	0	78	232	447	735	1,090	1,518	1,684	1,433	1,215
Forecast RTB Sale	0	27	78	70	(27)	(218)	(507)	(896)	(1,402)	(2,024)
Total	0	105	310	517	708	872	1,010	788	31	(809)

41. Internal borrowing has supported the HRA for 2024/25 financial year based on the 3 Month Sterling Overnight Index Average (SONIA). Internal borrowing of £52.9m in 2024/25 to meet resource requirements is included. Internal borrowing is charged at 5.1% and has been forecast at 4.7% from 2025/26.

- 42. From April 2025, external borrowing will be required. Despite concessionary HRA rates from the PWLB, rising capital requirements and borrowing rates have significantly impacted the business plan, based on the Council's latest projections. To allow for the Council to optimise its use of borrowing, no revenue contributions have been provided until year 20 of the plan and the additional revenue balances allow for the Council to support the financing costs.
- 43. To accurately reflect debt financing costs, year 1 borrowing is treated as internal borrowing (per current corporate treasury practice), while 2025/26 is planned as a 30-year PWLB loan to benefit from the concessionary HRA rate until March 2026. Future borrowing is assumed to be external, with a 3.6% annual charge.
- 44. Whilst borrowing to support capital expenditure, the Council plans to refinance maturing external loans until 2036/37 and assumes no loan repayments, except for £59m of maturing self-financing loans after year 20, to be met from balances. Additional borrowing in years 1-20 is assumed to be long-term, not requiring repayment or impacting flexibility for future development.
- 45. It should be noted that interest rates have fluctuated over the past 12 months and are not falling to the levels previously anticipated by some commentators. Therefore, it may be prudent to take shorter term borrowing in anticipation of rates falling and refinancing those loans at lower rates. The table below illustrates how rates have fluctuated over the past 12 months.



46. A depreciation review was carried out in September 2024 and backdated to the financial year 2022/23. This reduced the depreciation charge to £8.7m from £12m and has had a positive impact on the opening balance of the HRA which has been restated. A positive impact of this is the amount of interest earned on the higher HRA balance. It is a regulatory requirement that a componentised depreciation charge is made to the revenue account and added to the capital (Major Repairs) Reserve. This change has contributed to higher opening balances on the reserve account of £6.5m. It has also increased the revenue balance by £40m over the next 10 years which supports additional borrowing throughout the plan. As this is just a transfer of resources between revenue and capital, this leads to a reduction in future MRR balances, which in turn reduces the previous provision for the long-term repayment of debt.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	000£	000 <del>2</del>	£000	£000	000 <del>2</del>	£000				
Salances and Depreciation	6.502	12.069	15.215	18.349	21.686	25 189	28.830	32.591	36 483	40 461

- 47. Forecast inflation for 2025/26 included in the approved model was 3.0% for RPI and 2.0% for CPI. These are updated in line with the September indices in the current plan to 2.7% and 1.7%. The refreshed plan has been updated with the September inflation indices which are used for regulatory (and therefore modelling) purposes for the following year. CPI which is used for rent regulation is 1.7% for 2025/26 (down from 2% on the previous model) and 2% thereafter in line with the Government target. RPI which is used for RTB attributable debt calculations is also used as the underlying inflation applied to the business plan and is 2.7% for 2025/26 (down from 3% on the previous model) as per the September index and is assumed as 3% thereafter (assuming an average variance to CPI of about 1% in recent years).
- 48. Rents are to be increased by CPI + 1% (2.7%) from 2025/26 which means that on the previous model they would have been assumed as increasing by 3% from 2025/26. A lower than anticipated September CPI has had a negative impact on future income.
- 49. The table below illustrates how inflation for 2025/26 reduces balances as income loss from lower rents is greater than the reduction to expenditure, with a net impact on balances of £57k over ten years to 2032/33.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	000 <del>2</del>	000£	000 <del>2</del>	000 <del>2</del>	£000	000 <del>2</del>				
2025/26 Inflation	0	(225)	(213)	(198)	(181)	(162)	(139)	(115)	(87)	(57)

- 50. Rents projection for rental income in the business plan has been updated for the latest stock data and allowance for the relet of properties to new tenants at the formula rent level.
- 51. Social rents are set at the formula rent (which reflects the size, value and location of the property. Formula rent caps continue to apply with flexibility of up to 5% (10% for supported housing) where there is clear rational for doing so. Actual rents are increased in line with the Government Rent Standard. When re-letting to new tenants the Council can apply the formula rent.
- 52. The latest consultation paper on future increases to social rents was issued on 30 October 2024 and closes on 15th January 2025. Rental increases in this latest version of the business plan have been assumed at CPI + 1% for the next ten years in line with pre budget reports. This increases balances by £14m over 10 years.
- 53. The Government consultation proposes CPI + 1% for five years from 2026/27 (to 2030/31) but is seeking views on extending this period.
- 54. For the purposes of projection, CPI is assumed as 1.7% for 2025/26 and 2% thereafter in line with the Government target.

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33	2033.34
	£000	£000	£000	000 <del>2</del>	£000	£000	£000	£000	£000	000 <del>2</del>
Rents	0	(5,892)	(10,654)	(15,316)	(20,176)	(24,978)	(29,837)	(25,605)	(30,817)	(36,025)

55. The model has been updated with the latest forecast for 2024/25 which includes updates for additional repairs costs along with a preliminary budget for 2025/26 with future increases limited to CPI only until 2033/34. This update reduces balances by £36m over ten years.

 2024.25
 2025.26
 2026.27
 2027.28
 2028.29
 2029.3
 2030.31
 2031.32
 2032.33
 2033.34

 £000
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 Budget Updates
 0
 (5,892)
 (10,654)
 (15,316)
 (20,176)
 (24,978)
 (29,837)
 (25,605)
 (30,817)
 (36,025)

#### **Model Outputs and Analysis**

56. This section summarises the outputs to the business plan model, giving the latest picture of the current and forecast financial position of the HRA and its capital programme. It also quantifies some of the risks to the business both within and outside the control of the Council. To make viewing easier the tables are shown for the first ten years, which covers the duration of the CHBP, but the output analysis refers to the full 30-year period in recognition of the importance of long-term sustainability for the HRA.

#### Capital Expenditure and Resourcing

	2024.25	2025.26	2026.27	2027.28	2028.29	2029.3	2030.31	2031.32	2032.33
	€000	€000	£000	£000	£000	£000	£000	€000	£000
CAPITAL EXPENDITURE									
Major Works & Improvements	15,848	15,309	14,941	15,538	16,364	16,856	16,629	17,027	15,449
Development Schemes	20,149	25,128	42,854	24,189	16,787	6,121	6,071	6,071	14,778
Total Expenditure	35,997	40,437	57,795	39,727	33,152	22,978	22,700	23,098	30,227
FINANCING									
External Borrowing	0	23,392	37,623	27,112	19,607	13,031	12,365	12,408	18,239
Internal Borrowing	16,370	0	0	0	0	0	0	0	0
RTB Receipts*	2,013	(31)	(28)	(24)	(21)	(17)	(13)	(8)	(4)
Retained Receipts	10,332	777	802	827	854	881	909	938	968
Grant	1,854	2,960	7,162	2,940	810	0	0	0	420
Other Capital Receipts	952	1,517	3,494	100	3,120	0	0	0	507
Major Receipts Reserve	4,475	12,823	8,742	8,772	8,781	9,082	9,438	9,761	10,096
Total Financing	35,997	41,438	57,795	39,727	33,152	22,978	22,700	23,098	30,227

<sup>\*</sup>Under the current RTB regulations, the forecast reduction in sales means that additional resources are required to meet capital expenditure.

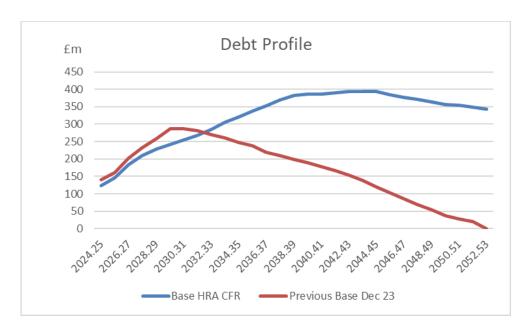
- 57. The capital programme includes the CHBP with £250.8m for 1,000 homes and £522.7m for existing housing over 30 years. No revenue contributions are made until year 20 to optimise borrowing. These additional balances help finance costs while supporting capital expenditure. The Council plans to refinance maturing loans and cover shortfalls with additional borrowing. Year 1 borrowing will be internal, following current treasury practices, and Year 2 borrowing will be a 30-year PWLB loan at a concessionary rate until March 2026. Future borrowing is assumed at 3.6% annually.
- 58. There was a surge in the number of RTB applications, with discounts calculated under the previous arrangements before the £30k cap on 21 November 2024 following the budget announcement. Forecasts show higher sales and receipts in 2024/25, followed by a decline once the reduced discount is applied. The additional receipts are delayed until 2025/26 so original borrowing plans are maintained, resulting in reduced use of the Major Repairs Reserve (MRR) in 2024/25, with the remainder allocated to 2025/26. Grant and other capital receipts fund the CHBP. The Council plans to fully utilise retained receipts and balances before the new financial freedoms expire in

- March 2026. This approach eliminates any liability for repayment or interest throughout the business plan.
- 59. The table below shows the balance and forecast use of retained RTB receipts that are used to support the CHBP each year. The business plan includes an increase in forecast RTB sales because of an increase in applications that were received after the budget announcement. All receipts can be used to support eligible expenditure. Ongoing annual forecast sales are lower, which would have previously resulted in no retained receipts. However, the Autumn Budget allows the Government to forgo its share of receipts, adding them to the retained receipts and ensuring a steady level of retained funds.

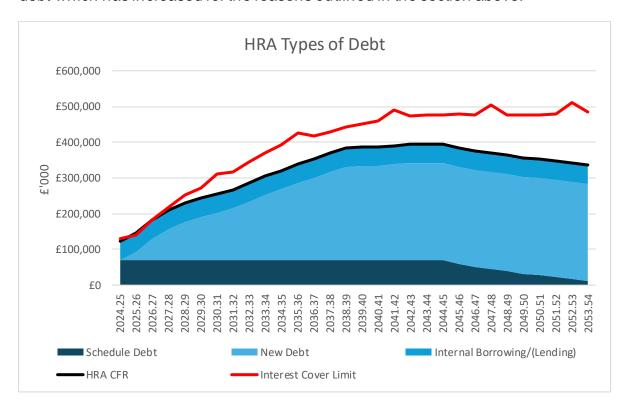
Year	Balance £000	Retained receipts £000	Used to support CHBP £000
2024/25	6,026	4,306	10,332
2025/26	0	777	777
2026/27	0	802	802
2027/28	0	827	827
2029/30	0	854	854

- 60. The chart overleaf shows how the debt profile on this latest version of the business plan compares to the previous model. This shows that the level of debt has gone up substantially and peak borrowing has increased and remains higher for an extended period which means the profile is no longer that of a repayment model.
- 61. The reduction in depreciation charges have increased revenue balances and allows for borrowing throughout the plan but removes the future MRR balances that provide for the repayment of debt. As the CHBP has been extended, the requirement to borrow is initially less than it was before, but borrowing is required for a longer period. Higher revenue balances are available to repay debt in future years.
- 62. The debt profile has also changed due to other adverse factors that have affected local authorities including the restriction of rents, additional statutory health and safety requirements, increases in interest rates and increased building and energy costs.

  This means that there are higher levels of borrowing and reduced levels of repayment.
- 63. Borrowing continues while the RCCO is set to zero and increases the peak debt to £394.5m. After this time debt is repaid at maturity and the debt outstanding at year 30 is £335.5m



64. The chart below shows the different types of debt that make up the debt profile and shows that although debt is higher, it remains below the maximum limit for interest cover. Internal and scheduled debt are included, but most of the debt comprises new debt which has increased for the reasons outlined in the section above.



- 65. The Council's debt management strategy is to provide for repayment of debt once there are sufficient resources available in the plan. The business plan assumes that as soon as additional resources are available in the HRA these will be used to provide for the repayment of debt. which commences in 2044/45. In practice, whether the loans are repaid will be subject to corporate treasury decisions and will affect the HRA capital financing requirement (HRA CFR), which could have implications for the Council's overall financing requirement.
- 66. Additional borrowing is assumed at concessionary HRA rates based on the forecasts from the Council's advisors (applied as a consolidated rate on an annual basis). This

additional borrowing is used to resource the CHBP and programme of works for existing stock (including the decarbonisation plans) until 2042/43 after which revenue balances are used to support the capital programme and no further borrowing is required. The additional annual borrowing requirements until 2042/43 total £288m. During this time, the outstanding loans undertaken to meet the cost of self-financing are refinanced at maturity.

#### Revenue Projections

	2024.25 £000	2025.26 £000	2026.27 £000	2027.28 £000	2028.29 £000	2029.30 £000	2030.31 £000	2031.32 £000	2032.33 £000
Income									
Dwelling Rents	31,470	31,939	33,885	35,949	37,616	39,112	41,444	42,174	43,892
Voids	(253)	(162)	(174)	(186)	(196)	(205)	(218)	(223)	(233)
Net Rents	31,217	31,778	33,711	35,763	37,420	38,907	41,226	41,951	43,658
Non Dwelling Rents	425	449	462	476	491	505	521	536	552
Charges for services and facilities (net of voids)	1,211	1,228	1,265	1,303	1,342	1,383	1,424	1,467	1,511
Contribution torwards expenditure	1,160	1,160	1,195	1,231	1,268	1,306	1,345	1,385	1,427
Other Income	93	93	96	99	102	105	108	111	115
Expenditure									
Repairs and Maintenance	(11,367)	(12,612)	(12,851)	(13,095)	(13,344)	(13,597)	(13,855)	(14, 117)	(14,385)
Supervision and Management	(5,170)	(5,324)	(5,425)	(5,528)	(5,632)	(5,739)	(5,848)	(5,959)	(6,072)
Special Services	(1,729)	(1,638)	(1,671)	(1,704)	(1,738)	(1,773)	(1,808)	(1,845)	(1,881)
(Increase)/ decrease in provision for bad debts	(370)	(370)	(370)	(370)	(370)	(370)	(370)	(370)	(370)
Depreciation and impairment of fixed assets	(8,680)	(8,680)	(8,680)	(8,772)	(8,781)	(9,082)	(9,438)	(9,761)	(10,096)
Net cost of services	6,790	6,085	7,734	9,403	10,758	11,645	13,305	13,398	14,458
Interest payable incl. amortisation	(4,545)	(5,212)	(6,341)	(7,553)	(8,425)	(9,044)	(9,531)	(9,985)	(10,551)
HRA investment income	526	527	424	480	552	637	744	865	992
Surplus/ (deficit) for the year	2,771	1,400	1,817	2,331	2,885	3,238	4,517	4,280	4,899
STATEMENT OF MOVEMENT ON THE HRA BALANCE									
Surplus/ (deficit) for the year	2,771	1,400	1.817	2.331	2.885	3,238	4,517	4.280	4.899
HRA Balance Brought Forward	10,242	13,014	14,413	16,231	18,562	21,447	24,685	29,203	33,483
HRA Balance Carried Forward	13,014	14,413	16,231	18,562	21,447	24,685	29,203	33,483	38,382
	,	,	,	,	,	,	,	,	,

- 67. The table above summarises the HRA budget over the next 9 years and shows a projected surplus in 25/26 of £1.4m. There is a spike in the surplus in years 24/25 and in 30/31 because there is an extra rent week in those years. The table shows the cost of borrowing increasing which reflects the additional investment in the CHBP. However, there is sufficient operating income to be able to meet these costs and retain an annual surplus. The HRA balance increases to £74m at year 30 having already repaid £59m self-financing debt at maturity, reducing our debt down to £335.5m at year 30.
- 68. The table below shows the use of HRA income by type of expenditure.



#### Repayment of Debt

69. The business plan has calculated that using the assumptions outlined in this report, a maximum repayment of debt of £76.5m is possible and the chart below shows what would happen to the debt curve as a result (green line).



70. The table overleaf shows how the revenue balance would be affected if an additional debt repayment of £76.5m is applied. This shows that debt would reduce to £259m at year 30. The minimum interest cover ratio would remain unaffected. It should be noted however that this provides no capacity for any additions to the plan, limits the scope to make any further changes and does not allow for any early repayment penalties on loans.

Business Plan	Revenue Balance at Year 30 £m	Peak Debt £m	HRA CFR at Year 30 £m	Minimum Interest Cover Ratio
				%
Base	73.874	394.500	335.500	127%
Base with Repayment after 2042/43	1.314	394.500	259.000	127%

#### **Risks & Opportunities for Mitigation**

- 71. Social rents are regulated by the policy statement and Rent Standard, with annual increases limited by regulations. As a result, charges for existing tenants cannot exceed the allowed increase. The latest consultation invites feedback on the proposed 5-year settlement for maximum increases, starting in 2026/27. This business plan assumes rental increases of CPI+1% over 10 years in line with pre budget reports and to maintain the affordability of the plan. This might not be possible pending the outcome of the Rent Consultation.
- 72. The actual impact of changes to RTB (the reduction of the maximum discount to £30k) on sales volumes is not known at this stage and assumptions have had to be made

- about forecast sales. Further changes could be announced once the RTB Consultation closes on 15 January 2025 which could also affect the business plan.
- 73. The Government plans to consult on a new Decent Homes Standard for rented sectors. The requirements and implications on the business plan are unknown and no changes have been included.
- 74. There is some uncertainty around interest rates, which have fluctuated over the past year and are not falling as much as anticipated. Given the latest PWLB business rate projections, it may be prudent to take out shorter term borrowing in anticipation of rates falling and exploring the possibility of refinancing at lower rates when loans mature.
- 75. The HRA currently benefits from a concessionary rate on PWLB borrowing which is equivalent to the PWLB standard rate less 60 basis points (0.60%). This rate was introduced on 15 June 2023. The Autumn Budget 2024 confirmed that the availability of this rate has now been extended to March 2026. It is not yet known whether this is to be extended any further.
- 76. There are several measures that can be taken to mitigate the risks identified and outlined above.
- 77. To ensure effective debt management decisions and business planning, key HRA representatives will be involved in treasury decisions. This will help to ensure a clear picture of business planning forecasts and the management of debt. Retaining revenue balances will help to support changes in financing costs.
- 78. Under current regulations, if the debt from RTB sales is lower than the assumed debt in the self-financing settlement, the allowable debt becomes negative, and this tends to offset the local authority (LA) share of receipts. In Wiltshire, however, the LA share goes to the General Fund so the HRA must raise additional funds to cover the negative debt and allocate the LA share. The Council could elect to shift the LA share to the HRA. If the Consultation Paper proposal to include the LA share with retained receipts is approved, the resources would only be available to the General Fund if the expenditure meets retention agreement terms.
- 79. Another option to mitigate the risk to the HRA is to adjust the CHBP, providing more flexibility for prudential debt management by aligning the programme with resources that may change due to Government policy changes. This could involve further revisions to the timing or level of the programme.
- 80. Use of Formula Rent Flexibility provides another opportunity to mitigate risk. Formula rent calculations consider the January 1999 value, bed size and location. Flexibility of up to 5% on general needs accommodation or up to 10% on supported accommodation where there is clear justification for doing so. Some local authorities are using this flexibility based on funding of decarbonisation works where it will reduce energy costs for tenants. It's unclear how this is viewed by the Social Housing Regulator. This would be beneficial to the business plan and would be unaffected by any additional constraints applied to future rent increases.

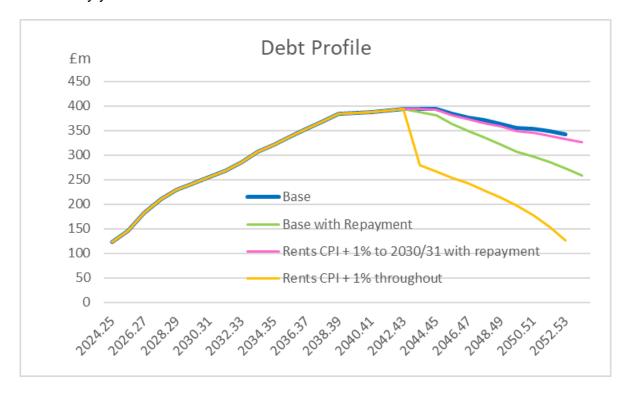
#### **Rent Consultation and Scenario Analysis**

- 81. The Rent Consultation invites feedback on a proposed new Direction from the Secretary of State to the Regulator of Social Housing concerning social housing rent policy and focuses on the implementation of a new rent policy effective from 1 April 2026 and closes on 23 December 2024.
- 82. The consultation presents various options for review but proposes rents are increased by CPI + 1% until 2030/31 (a 5-year settlement). This could represent the worst possible scenario to the Council and would still allow the Council to continue with its existing plans but would dip below the minimum interest cover ratio (as shown in table 9.4.1).
- 83. Prior to the Budget, it was reported that the Government was planning to allow rent increases of up to CPI + 1% for the next 10 years. This has been built into the base Business Plan model. The anticipated best-case scenario for rents would be ongoing increases of CPI + 1%. No guarantees of this type would be forthcoming from the Government, but it is useful to show the impact on the Council if this were to be realised.
- 84. The interest cover ratio shows how easily the HRA can pay interest on its outstanding debt and helps officers and Members determine the HRA's level of risk for future borrowing.
- 85. The table overleaf compares the base business model with best and worst-case rent assumptions.

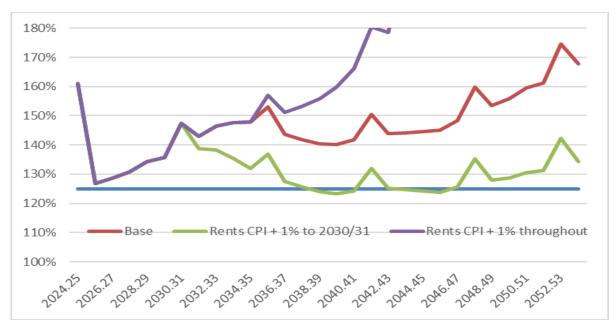
Business Plan and Scenarios	Revenue Balance at Year 30 £m	Peak Debt £m	HRA CFR at Year 30 £m	Minimum Interest Cover Ratio
Base	73.874	394.500	335.500	127%
Base with Repayment	1.314	394.500	259.000	127%
Rent CPI + 1% to 2030/31	10.692	394.500	335.500	123%
Rent CPI + 1% to 2030/31 with Repayment	1.152	394.500	325.400	123%
Rent CPI + 1% throughout	1.406	394.500	99.480	127%

- 86. In the worst-case scenario, where rents increase at CPI + 1% until 2030/31 and then at CPI, borrowing and repayment levels remain unchanged as they are manageable, maintaining the business plan's viability. However, the lower rent income leads to a reduced interest cover ratio, falling below the 125% target. For comparison, both the base model and the CPI + 1% to 2030/31 models are tested with repayment profiles that use available revenue to support the required borrowing repayments.
- 87. In the best-case scenario, where rents increase by CPI + 1% throughout the Plan, income from rents rises after year 10, reducing borrowing requirements. With an annual surplus, additional debt repayments can be made. While the scenario assumes maximum debt repayment each year to minimise debt, the Council may choose to defer loan repayments to avoid early repayment penalties.
- 88. The graph overleaf shows how the debt profile of the base business plan compared to each of the following scenarios:

- Base (green line) plus additional £76.5m debt repayment (applied from year 20).
- Worst case (pink line) rents of CPI + 1% to 2030/31 without additional debt repayment.
- Best case (yellow line) rents of CPI + 1% throughout
- 89. The base and worst-case (CPI + 1% increases to 2030/31) models have the same borrowing requirements, and repayment plans for maturing self-financing loans.
- 90. In the best-case scenario (CPI + 1% throughout), the increased rental income enables debt repayments to begin in year 20, significantly reducing the outstanding debt to £99.5m by year 30.



91. The graph below shows how the interest cover is affected by each of the different scenarios:



- 92. This chart shows that the best-case scenario which has increased rents, generates an increased surplus from 2035/36 (year 12). The increased surplus, with the same debt level as the base model, boosts the interest cover ratio (ICR), which rises above 180% after 2042/43 (year 19).
- 93. The worst-case scenario (CPI+1% to 2030/31 only) has lower rents from 2031/32 compared to the base model and consequently lower operating surpluses.
- 94. In year 15 (2038/39), the ICR drops to 124%, then to 123% in year 16 (2039/40), and back to 124% in year 17 (2040/41). Although the ICR rises in year 18 (2041/42), it falls below the target again, reaching 123% (just shy of the 125% minimum target) in years 21 (2044/45) and 22 (2045/46). No further changes have been made to this model, as other business factors will likely impact the analysis before these dates.
- 95. Scenarios that include debt repayment raise the ICR by reducing financing costs. However, the repayments in the CPI + 1% to 2030/31 model are not enough to impact the ICR in years 21 and 22, keeping it below 125%.

#### **Business Plan review conclusions**

- 96. The base business model assumes rental increases of CPI+1% for 10 years from 2026/27 reducing to CPI thereafter and shows a sustainable long term HRA that supports the Council's current CHBP and existing stock capital plans and revenue balances are maintained above the minimum required level throughout with a balance of £74m at the end of the plan. This includes repayment of £59m of self-financing debt at maturity and results in a minimum level of interest cover of 127% in 2025/26, rising thereafter.
- 97. Several updates have been made to the business plan. Crucially, borrowing has increased significantly due to various factors as outlined in the report. However, the depreciation charge is now much lower, resulting in higher revenue balances, which makes financing this level of debt affordable. The rephasing of the CHBP has helped ensure the plan remains affordable. If it is decided that the debt should be reduced, options are available, such as further rephasing of the CHBP or reducing spending on repairs and maintenance.
- 98. The scenario analysis indicates that up to £76.5m in additional borrowing repayments could be made after 2042/43, reducing debt to £259m and leaving a £1.3m revenue balance by year 30, with a minimum interest cover ratio of 127% (excluding early repayment penalties). Increasing rents by CPI + 1% throughout the plan would boost income from year 10, reduce borrowing, and maintain a minimum interest cover ratio of 127%. If rent increases are limited to CPI + 1% for only 5 years, followed by CPI, the minimum interest cover ratio would fall to 123%, below the 125% required. This analysis shows that even in the worst-case scenario, the ratio only slightly dips below 125%, with several options available to improve the plan's affordability.
- 99. The analysis reflects the Council's debt management strategy to provide for debt repayment once resources are available. This is dependent on maintaining revenue balances at the planned levels and any decisions that reduce income or increase expenditure could not only affect the provision for debt repayment but also the capacity to consider new development in the future.

#### Revenue Budget Estimates for 2025/26

- 100. Appendix 1 provides an overview of the proposed revenue budget for 2025/26.
- 101. The main changes to the budget include:
  - Resources have been enhanced in several areas of the service to address current and future challenges. Salary budgets have been increased to accommodate additional posts to deal with:
    - i. Two cleaning posts have been created to provide a reactive in-house service to tackle damp and mould cleaning, the cleaning of voids, and the cleaning of communal areas. This work is currently delivered via contractors, and the new reactive service will deliver a cash saving as well as being more responsive.
    - ii. Salary budgets have been increased by £0.342m, mainly to reflect estimated pay inflation of 2.5%, the increase to the main rate of secondary Class 1 National Insurance (employer) contributions from 13.8% to 15% and the reduction in the Class 1 National Insurance (employer) contribution threshold from £9,100 to £5,000 per annum. Although government have indicated support for local authorities to fund these increased charges, it is assumed no support is available to the increased costs to the HRA.
  - As outlined in paragraph 46 a review of depreciation was carried out during 2024/25 and updated the estimated useful lives of some of the assets which means that the forecast for depreciation is now a lot lower than budget, releasing £3.420m which can be used to support other areas in the HRA.
  - The budgets for interest payable have been increased by £2.490m and interest receivable by £0.198m so that they are more in line with the latest estimates based on increased rates and the CHBP borrowing requirements.
  - The budget for Repairs & Maintenance has been increased by £2.494m. The service is projecting an overspend against budget in the current financial year due to several factors. These include efforts to reduce damp and mould, ongoing works to address a historical backlog of void dwellings, a rise in the number of incoming repair requests, increased activity to ensure landlord compliance in response to growing demands from the SH regulatory agenda, as well as significant inflationary pressure on construction-related costs.
  - The budget has been adjusted to account for inflation impacting all contracts, material and energy costs.

#### **Dwelling Rental Income**

102. The Welfare Reform and Work Act of 2016 mandated a Social Rent reduction, requiring all social housing landlords to decrease tenants rent by 1% annually for a four-year period, from April 2016 to April 2019 (excluding shared ownership homes and temporary accommodation). On 17th November 2022 the Chancellor of the Exchequer delivered his Autumn statement and announced the decision to impose a 7% ceiling to social housing rents replacing the annual rent standard for 2023/24

- (which would have meant increasing rents by CPI + 1% for that year). This ceiling is to be lifted from 2025/26 meaning that rents can be increased by a maximum of CPI + 1% in 2025/26. The historical impact of this has negatively impacted HRA balances.
- 103. Therefore, in accordance with the Regulator of Social Housing's Rent Standard, it is proposed Dwelling Rents for 2025/26 will increase by CPI+1%. Table 3 below shows the average weekly rent for existing and new tenants.

# Average overall rent increases for two and three bed houses

	2024-25	2025-26
2 bed	£108.24	£111.16
2 Bed Increase/ Decrease %	7.7%	2.7%
3 Bed	£118.05	£121.31
3 Bed Increase/ Decrease %	7.7%	2.7%
Average	£108.38	£111.36
Average Increase/ Decrease £	£7.75	£2.98

- 104. The service participates in a benchmarking group comprising other organisations that use the same housing consultancy provider as Wiltshire. The provider has confirmed that for 2025/26 all 24 local authorities in the group are proposing to increase their rents by CPI + 1% in 2025/26. Using 2024/25 data, Wiltshire has mid-range of average weekly rents ranking at 12 out of 24 providers.
- 105. Yearly rental income growth is crucial for realising the HRA's long-term aspirations and ensuring business continuity and in part to recover from prolonged period of rent reduction or capping. The ambitious capital programme that focuses on construction good quality low or zero carbon affordable housing in Wiltshire and making long-term improvements to the existing housing stock. This includes the energy efficiency programme making the housing more carbon neutral and therefore more cost effective for our tenants.
- 106. Other key programmes include estate improvements to waste facilities and upgrading of sewerage treatment works. Rental income will be allocated to fund the interest payments, maintain existing homes and assets, and support community initiatives, enhancing the overall quality of service for tenants and fostering community projects. The Council also provides a range of discretionary support to tenants that includes tenancy sustainment, financial support, and mental health support.
- 107. Making the decision to increase our rents is never easy and seeks to strike a balance between affordability for tenants, acknowledging the support services in place, with the investment required in homes and for the longer-term viability of the business plan for current and future tenants. This is even more challenging considering the current economic climate and current cost of living pressures.
- 108. The service has a variety of support options in place to assist tenants facing financial hardship. These professionals help tenants to manage their finances and optimise available income, such as access to benefits. Officers actively monitor arrears and maintain regular engagement with tenants, ensuring early intervention for those who are facing financial challenge. Over the last 12 months, demand has stayed consistent.

- 109. The new Rent Sense software system used by the Income Team which uses analytics to rationalise rent arrears accounts, is showing excellent results in reducing arrears. At the time of writing this report, the Support Team have dealt with 499 support cases so far, this financial year with 116 cases currently being worked on. In the year to date the team have secured financial gains for our tenants in the amount of £0.380m.
- 110. Additional assistance is provided to tenants through the Tenant Utility Hardship Fund, introduced in 2022/23. These resources are intended to support tenants who have been impacted by the escalating cost of living. The funding for this programme is derived from feed-in-tariff income generated by solar panels installed on the housing stock. Any funds remaining at the end of the financial year are held in reserve. There was £16,293 held in reserve at the end of the financial year 2023/24.
- 111. It should also be noted, that approximately 62% of our tenants are in receipt of benefits (Housing Benefit or Universal Credit) that covers the full cost of their rent and service charge (based on data as of December 2024). Of the remaining 38% approximately 23% are in receipt of benefit that partially covers their rent meaning that only 15% of tenants will be affected by the full increase. It should also be remembered that tenants have already benefited from below inflation rent increases in 2023/24 via the rent cap. Additionally, tenants also benefited from the 'social rent reduction' which required social landlords to reduce their rents by 1% each year for four years from 2016. The decision on rents does not just have a one-year impact, it compounds over the life of the business plan and so has a lasting impact on the viability of the business plan.
- 112. Benefits increases for 2025 are as follows, state and pension credits; 4.1%, inflation linked benefits and tax credits; 1.7%.

#### **Capital Programme**

113. The proposed Capital Programme 2025/26 is set out in Appendix 2.

#### Planned Refurbishment of Council Stock

- 114. The planned maintenance programmes for the housing stock (kitchen, bathroom, roof, window replacement, energy efficiency etc) continue to be delivered against budget. New contracts commenced in 2023/24 and work programmes across all maintenance disciplines have been developed.
- 115. A key work area of capital spending is through the Housing Energy Efficiency Programme (HEEP) which aims to improve energy efficiency and reduce carbon emissions across all housing assets over the next 10 years. This programme includes improving levels of insulation, removing gas heating and hot water systems and replacing them with electric systems, and installing solar panels. The programme aims to reduce tenant's utility bills as well as supporting the broader climate change mitigation agenda.
- 116. The service continues to explore the use of electric vehicles for the service and now has 4 small fully electric vans in operation. This approach will continue to be explored with further electric vehicles joining the fleet as the technology and carrying capacity improves.

117. Minor refurbishment projects continue across the Sheltered Schemes, on a programme that will be delivered over the next 3-4 years.

# Council House Build Programme

- 118. The current Council House Build Programme was a 10-year delivery programme from 2020/21 to provide 1,000 additional owned and managed Council Homes. This has now been extended to a 17-year programme, for reasons stated earlier in the report. It should be noted that earlier phases of the programme delivered 208 properties. To date the current programme has delivered 150 properties with over 400 in the pipeline.
- 119. The Programme has had to be revised and will now deliver circa 40% land led developments where the Council will manage the development of sites from project inception through to occupation. A variety of delivery methods are being used, with the delivery model for general needs housing as offsite MMC construction zero carbon homes. The Council have developed its own standard house types that in the future will be able to be deployed into further development sites, both for general needs and sheltered affordable housing.
- 120. The remaining 60% (as recently revised) of the programme is to be delivered by means of acquisition, this is being undertaken by working in partnership with regional/national developers on s106 and development agreement sites. Further there is engagement in the open market to purchase strategic homes for the use of affordable housing mainly for a range of needs including general needs, care leavers, adults with additional needs, rough sleepers and refugees.

# Financial Implications - Section 151 Officer Commentary

- 121. A review of the HRA Business Plan has been prepared by a housing finance specialist provider based on information provided by the Council's operational and finance professionals. There is a degree of scenario modelling which can be used to test appropriateness of rent levels and inflation on costs and interest levels which provides the required level of reassurance that risk is mitigated. Modelling shows that charging rent at a level less than recommended in this report will have twofold impact firstly in this financial year and ongoing impact, in all future financial years.
- 122. The plan includes use of the Major Repairs Reserve (MRR) and revenue. The HRA can finance the additional borrowing required, fully finance this borrowing and self-financing loans, over the course of the plan leaving a balance at the end of the plan of £74.0 million.
- 123. The Interest cover ratio is achieved and compares the net cost of services to the interest payable. The Interest cover of 125% is achievable assuming the rents are set at the recommended level.
- 124. There is always a risk in borrowing significant sums of money and the removal of the borrowing cap means that the Council can be more ambitious in terms of its development and acquisitions programme. Any schemes that the Council will consider borrowing money to finance, will be subject to the usual rigorous internal processes that ensure that the schemes are viable, meet Council priorities and will deliver homes that meet local needs. However, housing is viewed over the long-term and short-term fluctuations can have an impact which will need to be managed. It should be noted that timing of the CHBP is within our control and will be under review to ensure that

debt is affordable. As noted in the report, the in year review will provide modelling options to aid decision making around the level of acceptable debt. We will continue to pursue grant opportunities and access \$106 monies to keep our level of debt as low as possible.

- 125. The review of depreciation has led to a much lower annual depreciation charge and greatly increased the level of balances in the HRA revenue reserve with an HRA revenue reserve opening balance of £10.242m for 2024/25. This change means that the major repairs reserve (MRR) will be used up a lot quicker but higher revenue balances will help with the financing of debt and means that the HRA will be earning more interest on the higher balance.
- 126. There have been several changes regarding Right to Buy (RTB), and uncertainty remains about the impact of reduced discounts on the volume of sales going forward. Officers are awaiting the outcome of the consultation, which closes in the New Year, and will review the plan to ensure the assumptions built into the business plan remain acceptable. The number of RTB sales will also be closely monitored against what has been assumed in the plan. Similarly, the outcome of the rent review, which closes later this month, is highly anticipated and it is hoped that the restrictions on rent increases will not exceed the assumptions made. However, if they do, the plan will need to be updated to ensure it remains affordable.
- 127. The Business Plan provides a model for the future HRA based on best estimates and assumptions available. In recent years, we have seen significant economic challenge and change in relation to construction inflation and interest rates. Work will continue to monitor and refine these assumptions to inform strategic decision making and the plan will be adjusted as appropriate.
- 128. Risk remains within the assumptions included in the Business Plan; however, the Council has flexibility on some of the decisions at certain points during the Business Plan period. Future modelling supporting the Business Plan will include sensitivity analysis and an understanding of timing of decisions, such as when a change to the CHBP can be made (due to significant lead in times of such a programme) so that it opportunities are not missed.

#### Safeguarding Implications

129. The HRA has an ongoing responsibility for the safeguarding of vulnerable people within its communities. There are no changes proposed within this report.

#### **Public Health Implications**

130. The links between adequate housing and health is well documented, clearly the provision of social housing targets the most vulnerable people in society who could face many health challenges due to their circumstances. The provision of secure housing has a substantial positive impact on the quality of people's lives. The recommendations in this report are considered to have positive public health implications by the management of a sustainable social housing service that also incorporates substantial growth in new homes and investment in our current housing stock.

# **Procurement Implications**

131. A compliant procurement process will be followed in line with Public Contract Regulations 2015 for any required procurement. Procurement process will be designed and run, in conjunction with the Council's Procurement team and policies followed.

# **Equalities Impact of the Proposal**

- 132. The council's budget planning framework is supported by the development of Equality Impact Assessments (EIAs) for the budget proposals, identifying possible disproportionate impact in relation to the protected characteristics as described within the Equality Act 2010. The EIAs also identify potential mitigation where applicable.
- 133. The provision of social housing is by its nature supportive of the most vulnerable people in society in particular regarding economic status and age. The key proposal within the report that will have the most significant impact on residents is the rent increase. As set out in the report full consideration has been given to the financial circumstances of our tenants in relation to income and the cost-of-living pressures. Consequently, the service provides a wide range of support and assistance for our tenants in times of hardship as described in the report.
- 134. The increase to rent and services charges will be applied across the housing stock. The outcome of our EIA is that the increase in rent will have a neutral effect on protected groups.
- 135. To help support tenants on low incomes the housing service will continue to provide a number of initiatives to enable them to manage their finances and maximise their income:
  - Publish clear information on rent which helps tenants to manage their own finances;
  - Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs;
  - Take action to raise the awareness of accessing a range of welfare benefits;
  - Provide the opportunity to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim.

#### **Environmental and Climate Change Considerations**

136. As part of the Major Works capital programme, the HRA will be looking to replace components in a thermally efficient way where possible, for example installing air source heat pumps, external wall insulation and thermally efficient windows. Further detail on the Housing Energy Efficiency Programme can be found at Section 11 – Capital Programme.

#### **Workforce Implications**

137. There are no changes proposed within this report which would have workforce implications.

# **Legal Implications**

- 138. The Local Government and Housing Act 1989 mandated the HRA to be a separate 'ring-fenced' account, distinct from the General Fund. This restricts items in the HRA to those with statutory provision. Transfers between the HRA and General Fund are limited to specific circumstances. Housing rents should never be subsidised by the General Fund and likewise, Council Tax cannot be subsidised by the HRA. The Localism Act 2011 reshaped local authority housing financing by abolishing the national subsidy system and moving to a self-financing framework effective from April 2012. Consequently, local authority housing revenue accounts gained the capacity to retain all rental income, empowering them to effectively cover the costs associated with housing stock management and maintenance.
- 139. Under Section 76 of the Local Government and Housing Act 1989, the council is required, in advance of the financial year, to formulate proposals which satisfy the requirement that, on certain stated assumptions, the Housing Revenue Account for that year does not show a debit balance. The council is obliged to implement those proposals and from time to time to determine whether the proposals satisfy the 'break even' requirement. If not, then the council shall make such provisions as are reasonably practicable towards securing that the proposals as revised, shall satisfy the requirement.
- 140. Under Section 24 of the Housing Act 1985, the council can make such reasonable charges as it determines for the tenancy or occupation of its houses. The council is obliged, from time to time, to review rents charged and make such changes, as circumstances may require. In exercising this function (determining and fixing rent), the council should have regard to the rents charged in the private sector. A decision to increase rent constitutes a variation of the terms of a tenancy. Under Section 103 of the Housing Act 1985, in respect of secure tenancies, a notice of variation (specifying the variation and date on which it takes effect) must be served on each tenant. For non-secure tenancies (excluding introductory tenancies), a notice must be served that complies with Section 25 of the Housing Act 1985. The Housing Act 1985 defines the legal requirements for informing tenants of rent increases. In practice this requires the issue of written notification to each tenant a minimum of four weeks in advance of the date that the increase becomes operative.
- 141. Transfers between the HRA and General Fund are limited to specific circumstances. Housing rents should never be subsidised by the General Fund and likewise, Council Tax cannot be subsidised by the HRA. The Localism Act 2011 reshaped local authority housing financing by abolishing the national subsidy system and moving to a self-financing framework effective from April 2012. Consequently, local authority housing revenue accounts gained the capacity to retain all rental income, empowering them to effectively cover the costs associated with housing stock management and maintenance.

#### **Overview and Scrutiny Engagement**

142. The Council's Housing Board discussed this report in December 2024 and recommendations were put forward to Cabinet. In so doing they discussed the new higher level of borrowing required to deliver the business plan over the 30 year period and welcomed the anticipated further review expenditure in 2025 to seek to review the optimum delivery of the development programme with a view to reducing planned debt.

# James Barrah - Director of Assets Lizzie Watkin - Corporate Director of Resources (s.151 Officer)

Report Author: Marie Taylor, Head of Finance Children's & Education

# **Appendices**

Appendix 1 - Revenue Budget 25/26 Appendix 2 - Capital Budget 25/26

# **Background Papers**

<u>Future social housing rent policy - GOV.UK</u> Reforming the Right to Buy - GOV.UK

Appendix 1: Proposed HRA Revenue Budget 2025/26

	Outturn 2023-24	Rudget Heading	Budget 2024-25	Movement	Budget 2025-26
	£m	Budget Heading	£m	£m	£m
_	2.938	HRA Expenditure Provision for Bad Debt HRA Interest HRA Depreciation	0.370 2.722 12.100	0.000 2.490 (3.420)	0.370 5.212 8.680
Page 333	9.164 0.540	Repairs and Maintenance Supervision and Management General Supervision and Management Special	9.187 4.541 0.687 <b>29.607</b>	2.703 0.154 (0.110) <b>1.816</b>	11.890 4.694 0.578 <b>31.424</b>
	(0.445) (28.188) <b>(28.633)</b>		(0.399) (31.322) <b>(31.721)</b>	(0.198) (0.905) <b>(1.103)</b>	(0.597) (32.227) <b>(32.824)</b>
t	(0.257)	Transfer to/ (-from) HRA Reserve	2.113	(0.713)	1.400

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Appendix 2: Capital Programme HRA

Cap prog. To 29/30

Scheme Name	Budget 24/25 £m	Budget 25/26 £m	Budget 26/27 £m	Future Years £m
Housing Revenue Account				
Council House Build Programme	20.149	25.128	42.854	62.584
Planned Refurbishment Programme	15.848	15.309	14.941	64.174
Housing Revenue Account Total	35.997	40.437	57.795	126.758

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# Agenda Item 10

#### Wiltshire Council

#### **Full Council**

#### **25 February 2025**

# Council Tax Setting 2025/26

# **Executive Summary**

This report sets out, in the complex format prescribed by law, the resolutions required from the Council to set the Council Tax for the year 2025/26.

An Officer Decision was made on 12 December 2024 by Lizzie Watkin, then, Director of Finance & Procurement (s151 Officer), to approve the tax base of 195,453.54 band D equivalent households. This decision record is available <a href="here">here</a>. A draft net budget requirement of £527.420m (to fund a council tax requirement of £368.819m) gives a band D council tax, inclusive of the 2% Adult Social Care Levy for 2025/26 of £1,886.99.

Fire, Police and Town/Parish precepts are in addition to the Wiltshire Council basic Council Tax.

The main body of the report sets out the statutory calculations, and shows the Fire, Police and Town/Parish precepts for every parish in the Wiltshire Council Tax Area along with the total Council Tax figures.

# **Proposal**

That Council approves the resolutions as set out within the report.

# **Reason for Proposal**

To meet the statutory requirement to set the Council Tax. The calculations are as defined by law, and the figures will change only if the budget proposal is amended.

#### Wiltshire Council

#### **Full Council**

# **25 February 2025**

# **Council Tax Setting 2025/26**

# **Purpose of Report**

1. The purpose of this report is to enable the Council to calculate and approve the Council Tax requirement for 2025/26.

# **Background**

- 2. The Localism Act 2011 requires the billing authority to calculate the council tax requirement for the year.
- 3. An Officer Decision was made by Lizzie Watkin, then, Director of Finance & Procurement to approve the 2025/26 Wiltshire Council tax base of 195,453.54 on 12th December 2024.

#### **Wiltshire Council**

- 4. The 2025/26 Local Government Finance Settlement set out central government's decision in respect of the core principle and package of flexibilities in respect of Council Tax for 2025/25. The principles and flexibilities that apply to Wiltshire Council are:
  - (a) Unitary authorities may increase the basic element (core principle) of the council tax with a threshold of 3.00% triggering a local referendum.
  - (b) Local authorities with the responsibility for adult social care have an additional flexibility on their council tax referendum threshold to be used entirely for adult social care. These local authorities will be able to increase the adult social care precept by a further 2% on top of the basic element (core principle).
- 5. At the Cabinet meeting on 6 February 2024, it was recommended that Wiltshire Council increase its basic element of the band D Council Tax by 2.50% for 2025/26 (2.99% for 2024/25).
- 6. It was also recommended at the same meeting that Wiltshire Council take up the additional 2.00% flexibility in respect of adult social care for 2025/26.
- 7. The total recommended increase to the average band D Council Tax for 2025/26 is therefore 4.50% (4.99% for 2024/25). This results in an average band D Council Tax of £1,886.99 for 2025/26 (£1,805.73 for 2024/25).
- 8. Since the Cabinet meeting on 4 February 2025, the precept levels of other precepting authorities have been received.

#### **Town & Parish Councils**

- 9. The 2025/26 Local Government Finance Settlement confirmed that no referendum principles would apply for Town & Parish Councils for 2025/26.
- 10. The Town & Parish Council Precepts for 2025/26 are detailed in Appendix C including the total of £35,413,785.64. The increase in the average band D Council Tax for Town & Parish Councils is 7.64% and results in an average band D Council Tax figure of £181.19 for 2025/26 (£168.33 for 2024/25).

#### Office of the Police & Crime Commissioner for Wiltshire & Swindon

- 11. The government for 2025/26 has set a capping level of a £14 increase on Band D council tax levels for all Police & Crime Commissioners.
- 12. The Office of the Police & Crime Commissioner for Wiltshire & Swindon met on 5 February 2025 and set their precept in respect of the Wiltshire area at £55,366,113 exclusive of a Council Tax Collection Fund surplus of £501,071. This results in a band D Council Tax of £283.27 for 2025/26. This represents an increase of £14.00 (5.2%) compared to £269.27 for 2024/25.

#### **Dorset & Wiltshire Fire and Rescue Authority**

- 13. The 2025/26 Local Government Finance Settlement has set a capping level of £5 increase on Band D council tax levels for all Fire & Rescue Authorities
- 14. Dorset & Wiltshire Fire and Rescue Authority met on 6 February 2025 and set their precept in respect of the Wiltshire area. The amount for their precept of the Wiltshire area is £17,971,953 exclusive of a Council Tax Collection Fund surplus of £161,801.
- 15. This will result in a band D Council Tax of £91.95 for 2025/26. This represents an increase of £5.00 (5.75%) compared to £86.95 for 2024/25.

#### **Conclusions**

- 16. The recommendations are set out in the formal Council Tax Resolution in Appendix A.
- 17. The Wiltshire Council element of the Council Tax is recommended to be increased as follows:

	2024/25 %	2025/25 %
Wiltshire Council (Basic Amount)	2.99	2.50
Wiltshire Council (Adult Social Care)	2.00	2.00
Total	4.99	4.50

18. If the formal Council Tax Resolution in Appendix A is approved, the total band D Council Tax will be as follows:

	2024/25	2025/26	Increas	Increase
	£	£	е	%
			£	
Wiltshire Council	1,805.73	1,886.99	81.26	4.50%
Office of the Police	269.27	283.27	14.00	5.20%
& Crime				
Commissioner for				
Wiltshire & Swindon				
Dorset & Wiltshire	86.95	91.95	5.00	5.75%
Fire and Rescue				
Authority (draft)				
Sub - Total	2,161.95	2,262.21	100.26	4.63%
Town & Parish	168.33	181.19	12.86	7.64%
Council (average)				
Total	2,330.28	2,443.40	113.12	4.85%

- 19. The Adult Social Care Precept will account for £296.39 of the 2025/26 Wiltshire Council Band D figure above (£260.28 for 2024/25).
- 20. These increases do not require a referendum.

#### **Risks Assessment**

21. A full risk assessment of the budget proposals has been provided to Cabinet on 4 February 2025 in the Budget 2025/26 & MTFS Report.

# **Equality and Diversity Impacts of the Proposal**

22. None have been identified as directly arising from this report, although equality and diversity impacts have been considered by officers and portfolio holders when preparing budget proposals.

#### **Financial Implications**

23. The financial implications are outlined in the report.

#### **Workforce Implications**

24. None have been identified as arising directly from this report.

# **Legal Implications**

25. The legal implications are outlined in the report.

# **Public Health Implications**

26. None have been identified as arising directly from this report.

# **Environmental Implications**

27. None have been identified as arising directly from this report.

#### Safeguarding Implications

28. None have been identified as arising directly from this report.

# **Options Considered**

29. The calculations are as defined by law, and the figures will change only if the budget proposal is amended and affects the council tax requirement.

# **Reasons for Proposals**

30. To meet the statutory requirement to set the Council Tax. The calculations are as defined by law, and the figures will change only if the budget proposal is amended.

# **Proposal**

31. That the Council approves the resolutions as set out within the report.

#### **Lucy Townsend - Chief Executive**

# Lizzie Watkin - Corporate Director of Resources (s151 Officer)

Report Author: Sally Self, Chief Accountant, sally.self@wiltshire.gov.uk

# **Appendices**

Appendix A - Wiltshire Council - Council Tax Resolution 2025/26

Appendix B - Wiltshire Council - Council Tax Banding Schedule by Authority 2025/26

Appendix C - Wiltshire Council - Town & Parish Precepts 2025/26

#### **Background Papers**

The following published documents set out the statutory requirements and powers relevant to the subject of this report:

Local Government Finance Act 1992 Localism Act 2011

The Referendums Relating to Council Tax Increases (Principles) (England) Report 2025/26 as part of the final Local Government Finance Settlement

The following published documents have been referred to during the preparation of this report:

Wiltshire Council's Budget – Budget 2025/25 & MTFS report Council Tax Base 2025/26 Record of Officer Decision 12 December 2024

# The Council is recommended to resolve as follows:

- 1. It be noted that on 12 December 2024 a Record of Officer Decision was made to approve:
- (a) the Council Tax Base 2025/26 for the whole Wiltshire Council area as 195,453.54 [Item T in the formula in Section 31B(3) of the Local Government Finance Act 1992, as amended (the "Act")] and,
- (b) for dwellings in those parts of its area to which a Parish precept relates as in the attached Appendix.
- 2. Calculate that the Council Tax requirement for the Council's own purposes for 2025/26 (excluding parish precepts) is £ 368,818,875.44
- 3. That the following amounts be calculated for the year 2025/26 in accordance with Sections 31 to 36 of the Act:
  - (a) £1,226,625,772.64 (Gross Revenue Expenditure including transfers to reserves, parish precepts and any collection fund deficit) being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils).
  - (b) £663,791,900.00 (Gross Revenue Income including transfers from reserves, General Government Grants and any collection fund surplus) being the aggregate of the amounts which the Council estimates for the items set out in Section 31A(3) of the Act.
  - (c) £562,833,872.64 (Net Revenue Expenditure including parish precepts) being the amount by which the aggregate at 3(a) above exceeds the aggregate at 3(b) above, calculated by the Council in accordance with Section 31A(4) of the Act as its Council Tax requirement for the year. (Item R in the formula in Section 31A(4) of the Act).
  - (d) £2,068.18

    (Wiltshire Council band D tax plus average Town & Parish Councils Band D Council Tax) being the amount at 3(c) above (Item R), all divided by Item T (2 above), calculated by the Council, in accordance with Section 31B(1) of the Act, as the amount of its Council Tax for the year (including Parish precepts), as shown below:

Band	Band						
A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
1,378.79	1,608.59	1,838.38	2,068.18	2,527.77	2,987.37	3,446.96	

(e) £35,413,785.64 (Aggregate of Town & Parish Council Precepts) being the aggregate amount of all special items (Parish Precepts) referred to in Section 34(1) of the Act (as per the attached Appendix C).

(f) £1,886.99 (band D Council Tax for Wiltshire Council purposes only) being the amount at 3(d) above less the result given by dividing the amount at 3(e) above by Item T (2 above), calculated by the Council, in accordance with Section 34(2) of the Act, as the basic amount of its Council Tax for the year for dwellings in those parts of its area to which no Parish precept relates, as shown below:

Band	Band	Band	Band	Band	Band	Band	Band
A	B	C	D	E	F	G	H
£	£	£	£	£	£	£	£
1,258.00	1,467.66	1,677.32	1,886.99	2,306.32	2,725.65	3144.98	

	Band A	Band B		Band D			Band G	
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00	1,467.66				2,725.65		
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95			153.25	183.90
Town & Parish Council (Average)	120.79			181.19			301.98	362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
Aldbourne Parish Council	45.95	53.60	61.26	68.92	84.24	99.55	114.87	137.84
Alderbury Parish Council	44.26	51.64	59.01	66.39	81.14	95.90	110.65	132.78
All Cannings Parish Council	56.38	65.78	75.17	84.57	103.36		140.95	169.14
Allington Parish Council	67.17	78.37	89.56	100.76	123.15	145.54	167.93	201.52
Alton Parish Council	43.89	51.20	58.52	65.83	80.46	95.09	109.72	131.66
Alvediston Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Amesbury Town Council	116.73	136.18	155.64	175.09	214.00	252.91	291.82	350.18
Ansty Parish Council	19.81	23.11	26.41	29.71	36.31	42.91	49.52	59.42
Ashton Keynes Parish Council	37.81	44.12	50.42	56.72	69.32	81.93	94.53	113.44
Atworth Parish Council	51.29	59.83	68.38	76.93	94.03	111.12	128.22	153.86
Avebury Parish Council	43.05	50.22	57.40	64.57	78.92	93.27	107.62	129.14
Barford St. Martin Parish Council	35.87	41.84	47.82	53.80	65.76	77.71	89.67	107.60
Baydon Parish Council	42.61	49.72	56.82	63.92	78.12	92.33	106.53	127.84
Beechingstoke Parish Council	42.20	49.23	56.27	63.30	77.37	91.43	105.50	126.60
Berwick Bassett and Winterbourne Monkton Joint Parish Council	33.03	38.54	44.04	49.55	60.56	71.57	82.58	99.10
Berwick St. James Parish Meeting	16.00	18.67	21.33	24.00	29.33	34.67	40.00	48.00
Berwick St. John Parish Council	39.63	46.24	52.84	59.45	72.66	85.87	99.08	118.90
Berwick St. Leonard Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Biddestone & Slaughterford Parish Council	51.79	60.42	69.05	77.68	94.94	112.20	129.47	155.36
Bishops Cannings Parish Council	43.04	50.21	57.39	64.56	78.91	93.25	107.60	129.12
Bishopstone Parish Council	23.73	27.69	31.64	35.60	43.51	51.42	59.33	71.20
Bishopstrow Parish Meeting	14.59	17.03	19.46	21.89	26.75	31.62	36.48	43.78
Bowerchalke Parish Council	20.37	23.77	27.16	30.56	37.35	44.14	50.93	61.12
Box Parish Council	89.13	103.98	118.84	133.69	163.40	193.11	222.82	267.38
Boyton Parish Council	12.23	14.26	16.30	18.34	22.42	26.49	30.57	36.68
Bradford on Avon Town Council	198.49	231.58	264.66	297.74	363.90	430.07	496.23	595.48
Bratton Parish Council	66.53	77.61	88.70	99.79	121.97	144.14	166.32	199.58
Braydon Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Council Tax Schedule 2025/26(£)(£)Wiltshire Council (inclusive of Adult Social Care Levy)1,258.001,467.661,67Office of the Police & Crime Commissioner for Wiltshire & Swindon188.85220.3225Dorset & Wiltshire Fire and Rescue Authority61.3071.528	251.80 283.27 81.73 91.95 61.06 181.19 71.91 2,443.40	2,306.32 346.22 112.38 221.45	409.17 132.82 261.72	472.12 153.25 301.98	566.54 183.90 362.38
Wiltshire Council (inclusive of Adult Social Care Levy)  Office of the Police & Crime Commissioner for Wiltshire & Swindon  Dorset & Wiltshire Fire and Rescue Authority  1,258.00 1,467.66 1,67  188.85 220.32 25  61.30 71.52 8	77.32 1,886.99 251.80 283.27 81.73 91.95 61.06 181.19 71.91 2,443.40	2,306.32 346.22 112.38 221.45	2,725.65 409.17 132.82 261.72	3,144.98 472.12 153.25 301.98	3,773.98 566.54 183.90 362.38
Office of the Police & Crime Commissioner for Wiltshire & Swindon 188.85 220.32 25  Dorset & Wiltshire Fire and Rescue Authority 61.30 71.52 8	251.80 283.27 81.73 91.95 61.06 181.19 71.91 2,443.40	346.22 112.38 221.45	409.17 132.82 261.72	472.12 153.25 301.98	566.54 183.90 362.38
Dorset & Wiltshire Fire and Rescue Authority 61.30 71.52 8	81.73 91.95 61.06 181.19 <b>71.91 2,443.40</b>	112.38 221.45	132.82 261.72	153.25 301.98	183.90 362.38
	61.06 181.19 <b>71.91 2,443.40</b>	221.45	261.72	301.98	362.38
Town & Parish Council (Average) 120.79 140.93 16	71.91 2,443.40				
	, .	2,986.37	3,529.36	4 072 33	4 0000 00
Total 1,628.94 1,900.43 2,17				1,012.00	4,886.80
Council Tax Charge by band per Parish/Town Council					
	32.20 36.22	44.27	52.32	60.37	72.44
	42.98 48.35		69.84	80.58	96.70
	28.66 144.74		209.07	241.23	289.48
	36.42 40.97	50.07	59.18	68.28	81.94
	34.52 38.84	47.47	56.10	64.73	77.68
	50.91 57.27	70.00	82.72	95.45	114.54
	22.13 24.90	30.43	35.97	41.50	49.80
	87.65 98.61	120.52	142.44	164.35	197.22
	45.74 51.46		74.33	85.77	102.92
	38.88 43.74	53.46	63.18	72.90	87.48
	29.50 145.69	178.07	210.44	242.82	291.38
	34.58 38.90	47.54	56.19	64.83	77.80
	52.36 58.91	72.00	85.09	98.18	117.82
	0.00 0.00	0.00	0.00	0.00	0.00
	31.28 260.19	318.01	375.83	433.65	520.38
	47.07 52.95	64.72	76.48	88.25	105.90
	35.23 39.63	48.44	57.24	66.05	79.26
	18.84 21.19		30.61	35.32	42.38
	36.08 40.59	49.61	58.63	67.65	81.18
	14.43 16.23	19.84	23.44	27.05	32.46
	43.74 49.21	60.15	71.08	82.02	98.42
	62.65 70.48	86.14	101.80	117.47	140.96
Chicklade Parish Meeting 0.00 0.00	0.00 0.00	0.00	0.00	0.00	0.00
Chilmark Parish Council 42.52 49.61 5	56.69 63.78	77.95	92.13	106.30	127.56
	34.24 38.52	47.08	55.64	64.20	77.04
	85.58 321.28	392.68	464.07	535.47	642.56
	15.88 130.36		188.30	217.27	260.72
Chirton Parish Council 53.85 62.83 7	71.80 80.78	98.73	116.68	134.63	161.56

Witshine Council - Council Tax banding Schedule by Addionty 2023/20								Jenuix D
	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00	1,467.66		1,886.99	2,306.32	2,725.65	3,144.98	
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Town & Parish Council (Average)	120.79	140.93	161.06	181.19	221.45	261.72	301.98	362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
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Council Tax Charge by band per Parish/Town Council								
Chitterne Parish Council	52.09	60.78	69.46	78.14	95.50	112.87	130.23	156.28
Cholderton Parish Meeting	37.33	43.56	49.78	56.00	68.44	80.89	93.33	112.00
Christian Malford Parish Council	65.79	76.76	87.72	98.69	120.62	142.55	164.48	197.38
Chute Forest Parish Council	45.31	52.87	60.42	67.97	83.07	98.18	113.28	135.94
Chute Parish Council	48.69	56.80	64.92	73.03	89.26	105.49	121.72	146.06
Clarendon Park Parish Council	26.11	30.47	34.82	39.17	47.87	56.58	65.28	78.34
Clyffe Pypard & Bushton Parish Council	21.28	24.83	28.37	31.92	39.01	46.11	53.20	63.84
Codford Parish Council	37.83	44.13	50.44	56.74	69.35	81.96	94.57	113.48
Colerne Parish Council	58.51	68.27	78.02	87.77	107.27	126.78	146.28	175.54
Collingbourne Ducis Parish Council	56.46	65.87	75.28	84.69	103.51	122.33	141.15	169.38
Collingbourne Kingston Parish Council	46.27	53.99	61.70	69.41	84.83	100.26	115.68	138.82
Compton Bassett Parish Council	46.75	54.54	62.33	70.12	85.70	101.28	116.87	140.24
Compton Chamberlayne Parish Meeting	32.76	38.22	43.68	49.14	60.06	70.98	81.90	98.28
Coombe Bissett Parish Council	25.39	29.63	33.86	38.09	46.55	55.02	63.48	76.18
Corsham Town Council	179.19	209.05	238.92	268.78	328.51	388.24	447.97	537.56
Corsley Parish Council	30.02	35.02	40.03	45.03	55.04	65.04	75.05	90.06
Coulston Parish Council	41.68	48.63	55.57	62.52	76.41	90.31	104.20	125.04
Cricklade Town Council	162.03	189.03	216.04	243.04	297.05	351.06	405.07	486.08
Crudwell Parish Council	22.13	25.82	29.51	33.20	40.58	47.96	55.33	66.40
Dauntsey Parish Council	65.05	75.89	86.73	97.57	119.25	140.93	162.62	195.14
Devizes Town Council	146.68	171.13	195.57	220.02	268.91	317.81	366.70	440.04
Dilton Marsh Parish Council	32.69	38.14	43.59	49.04	59.94	70.84	81.73	98.08
Dinton Parish Council	27.31	31.86	36.41	40.96	50.06	59.16	68.27	81.92
Donhead St Andrew Parish Council	34.86	40.67	46.48	52.29	63.91	75.53	87.15	104.58
Donhead St. Mary Parish Council	28.54	33.30	38.05	42.81	52.32	61.84	71.35	85.62
Downton Parish Council	103.19	120.38	137.58	154.78	189.18	223.57	257.97	309.56
Durnford Parish Council	14.71	17.16	19.61	22.06	26.96	31.86	36.77	44.12
Durrington Town Council	69.83	81.47	93.11	104.75	128.03	151.31	174.58	209.50

	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00	1,467.66					3,144.98	3,773.98
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Town & Parish Council (Average)	120.79	140.93	161.06	181.19	221.45	261.72	301.98	362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
East Kennett Parish Meeting	0.00	0.00		0.00	0.00	0.00	0.00	0.00
East Knoyle Parish Council	28.46	33.20	37.95	42.69	52.18	61.66	71.15	85.38
Easterton Parish Council	54.91	64.06		82.36	100.66	118.96	137.27	164.72
Easton Grey Parish Meeting	22.07	25.75	29.43	33.11	40.47	47.83	55.18	66.22
Easton Royal Parish Council	52.40	61.13		78.60	96.07	113.53	131.00	157.20
Ebbesbourne Wake Parish Council	23.29	27.18	31.06	34.94	42.70	50.47	58.23	69.88
Edington Parish Council	41.43	48.34	55.24	62.15	75.96	89.77	103.58	124.30
Enford Parish Council	48.13	56.15		72.19	88.23	104.27	120.32	144.38
Erlestoke Parish Council	59.09	68.94	78.79	88.64	108.34	128.04	147.73	177.28
Etchilhampton Parish Council	31.14	36.33		46.71	57.09	67.47	77.85	93.42
Everleigh Parish Council	30.17	35.20	40.23	45.26	55.32	65.38	75.43	90.52
Figheldean Parish Council	72.93	85.08	97.24	109.39	133.70	158.01	182.32	218.78
Firsdown Parish Council	46.26	53.97	61.68	69.39	84.81	100.23	115.65	138.78
Fittleton cum Haxton Parish Council	42.67	49.78	56.89	64.00	78.22	92.44	106.67	128.00
Fonthill Bishop Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fonthill Gifford Parish Council	24.89	29.04	33.19	37.34	45.64	53.94	62.23	74.68
Fovant Parish Council	49.83	58.13		74.74	91.35	107.96	124.57	149.48
Froxfield Parish Council	62.28	72.66		93.42	114.18		155.70	186.84
Kennet Valley Joint Parish Council	25.03	29.21	33.38	37.55	45.89	54.24	62.58	75.10
Grafton Parish Council	19.59	22.86		29.39	35.92	42.45	48.98	58.78
Great Bedwyn Parish Council	34.51	40.26		51.76	63.26	74.76	86.27	103.52
Great Hinton Parish Council	38.32	44.71	51.09	57.48	70.25	83.03	95.80	114.96
Great Somerford Parish Council	22.02	25.69		33.03	40.37	47.71	55.05	66.06
Great Wishford Parish Council	24.90	29.05		37.35	45.65	53.95	62.25	74.70
Grimstead Parish Council	52.09	60.77	69.45	78.13	95.49		130.22	156.26
Grittleton Parish Council	10.00	11.67	13.33	15.00	18.33	21.67	25.00	30.00
Ham Parish Council	11.55	13.47	15.40	17.32	21.17	25.02	28.87	34.64
Hankerton Parish Council	25.01	29.18	33.35	37.52	45.86	54.20	62.53	75.04

Witishine Council - Council Tax banding Schedule by Additionty 2023/20								Jenuix D
	Band A	Band B	Band C	Band D	Band E	Band F		Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00	1,467.66		1,886.99	2,306.32			
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Town & Parish Council (Average)	120.79			181.19				362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
Heddington Parish Council	27.50	32.08	36.67	41.25	50.42	59.58	68.75	82.50
Heytesbury and Imber & Knook Joint Parish Council	40.87	47.68	54.49	61.30		88.54	102.17	122.60
Heywood Parish Council	16.35	19.07	21.80	24.52	29.97	35.42	40.87	49.04
Hilmarton Parish Council	28.18	32.88	37.57	42.27	51.66	61.06	70.45	84.54
Hilperton Parish Council	10.33	12.06	13.78	15.50	18.94	22.39	25.83	31.00
Hindon Parish Council	49.51	57.76	66.01	74.26	90.76		123.77	148.52
Holt Parish Council	34.25	39.96	45.67	51.38	62.80	74.22	85.63	102.76
Horningsham Parish Council	129.37	150.94	172.50	194.06	237.18		323.43	388.12
Hullavington Parish Council	32.85	38.33	43.80	49.28	60.23		82.13	98.56
Idmiston Parish Council	69.86	81.50	93.15	104.79			174.65	209.58
Keevil Parish Council	32.37	37.77	43.16	48.56	59.35	70.14	80.93	97.12
Kilmington Parish Council	68.16	79.52	90.88	102.24	124.96		170.40	204.48
Kington Langley Parish Council	47.00	54.83	62.67	70.50	86.17	101.83	117.50	141.00
Kington St. Michael Parish Council	113.73	132.68	151.64	170.59	208.50	246.41	284.32	341.18
Lacock Parish Council	53.00	61.83	70.67	79.50	97.17	114.83	132.50	159.00
Landford Parish Council	55.25	64.46	73.67	82.88	101.30	119.72	138.13	165.76
Langley Burrell Without Parish Council	71.13	82.98	94.84	106.69	130.40	154.11	177.82	213.38
Latton Parish Council	40.22	46.92	53.63	60.33	73.74	87.14	100.55	120.66
Laverstock & Ford Parish Council	62.14	72.50	82.85	93.21	113.92	134.64	155.35	186.42
Lea, Garsdon & Cleverton Parish Council	25.55	29.80	34.06	38.32	46.84	55.35	63.87	76.64
Leigh Parish Council	18.28	21.33	24.37	27.42	33.51	39.61	45.70	54.84
Limpley Stoke Parish Council	52.89	61.70	70.52	79.33	96.96	114.59		158.66
Little Bedwyn Parish Council	15.08	17.59	20.11	22.62	27.65	32.67	37.70	45.24
Little Cheverell Parish Council	67.37	78.59	89.82	101.05	123.51	145.96	168.42	202.10
Little Somerford Parish Council	43.31	50.52	57.74	64.96	79.40	93.83	108.27	129.92
Longbridge Deverill Parish Council	14.32	16.71	19.09	21.48	26.25	31.03	35.80	42.96
Luckington & Alderton Parish Council	28.03	32.71	37.38	42.05	51.39		70.08	84.10
Ludgershall Town Council	100.08	116.76	133.44	150.12	183.48	216.84	250.20	300.24

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	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00	1,467.66						
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82		183.90
Town & Parish Council (Average)	120.79		161.06			261.72		362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
Lydiard Millicent Parish Council	56.99	66.49	75.99	85.49	104.49	123.49	142.48	170.98
Lydiard Tregoz Parish Council	34.01	39.68	45.35	51.02	62.36	73.70		102.04
Lyneham And Bradenstoke Parish Council	27.75	32.37	37.00	41.62	50.87	60.12	69.37	83.24
Maiden Bradley and Yarnfield Parish Council	135.65	158.25	180.86	203.47	248.69	293.90	339.12	406.94
Malmesbury Town Council	162.69	189.81	216.92	244.04	298.27	352.50	406.73	488.08
Manningford Parish Council	33.10	38.62	44.13	49.65	60.68	71.72	82.75	99.30
Marden Parish Council	22.67	26.44	30.22	34.00	41.56	49.11	56.67	68.00
Market Lavington Parish Council	69.49	81.07	92.65	104.23	127.39	150.55	173.72	208.46
Marlborough Town Council	172.88	201.69	230.51	259.32	316.95	374.57	432.20	518.64
Marston Meysey Parish Meeting	29.85	34.82	39.80	44.77	54.72	64.67	74.62	89.54
Marston Parish Council	23.69	27.64	31.59	35.54	43.44	51.34	59.23	71.08
Melksham Town Council	133.28	155.49	177.71	199.92	244.35	288.77	333.20	399.84
Melksham Without Parish Council	63.77	74.39	85.02	95.65	116.91	138.16	159.42	191.30
Mere Parish Council	111.07	129.58	148.09	166.60	203.62	240.64	277.67	333.20
Mildenhall Parish Council	59.32	69.21	79.09	88.98	108.75	128.53	148.30	177.96
Milston Parish Meeting	15.26	17.80	20.35	22.89	27.98	33.06	38.15	45.78
Milton Lilbourne Parish Council	41.03	47.86	54.70	61.54	75.22	88.89		123.08
Minety Parish Council	17.27	20.14	23.02	25.90	31.66	37.41	43.17	51.80
Monkton Farleigh Parish Council	39.55	46.15	52.74	59.33	72.51	85.70		118.66
Netheravon Parish Council	49.63	57.91	66.18	74.45	90.99	107.54	124.08	148.90
Netherhampton Parish Council	26.07	30.41	34.76	39.10	47.79	56.48		78.20
Nettleton Parish Council	12.37	14.43	16.49	18.55	22.67	26.79	30.92	37.10
Newton Tony Parish Council	71.28	83.16	95.04	106.92	130.68	154.44	178.20	213.84
North Bradley Parish Council	19.93	23.25	26.57	29.89	36.53	43.17	49.82	59.78
North Newnton Parish Council	51.49	60.07	68.65	77.23	94.39	111.55		154.46
North Wraxall Parish Council	44.11	51.46	58.81	66.16	80.86	95.56	110.27	132.32
Norton & Foxley Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Norton Bavant Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Band A	Band B		Band D		Band F	Band G	Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)	1,258.00					2,725.65		
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Town & Parish Council (Average)	120.79			181.19		261.72	301.98	
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
Oaksey Parish Council	47.77	55.74	63.70	71.66	87.58	103.51	119.43	143.32
Odstock Parish Council	52.73	61.52	70.31	79.10	96.68	114.26	131.83	158.20
Ogbourne St. Andrew Parish Council	15.48	18.06	20.64	23.22	28.38	33.54	38.70	46.44
Ogbourne St. George Parish Council	46.37	54.10	61.83	69.56	85.02	100.48	115.93	139.12
Orcheston Parish Council	20.44	23.85	27.25	30.66	37.47	44.29	51.10	61.32
Patney Parish Council	14.87	17.34	19.82	22.30	27.26	32.21	37.17	44.60
Pewsey Parish Council	68.03	79.37	90.71	102.05	124.73	147.41	170.08	204.10
Pitton & Farley Parish Council	37.01	43.18	49.35	55.52	67.86	80.20	92.53	111.04
Potterne Parish Council	35.31	41.19	47.08	52.96	64.73	76.50	88.27	105.92
Poulshot Parish Council	61.37	71.59	81.82	92.05	112.51	132.96	153.42	184.10
Preshute Parish Council	38.96	45.45	51.95	58.44	71.43	84.41	97.40	116.88
Purton Parish Council	105.38	122.94	140.51	158.07	193.20	228.32	263.45	316.14
Quidhampton Parish Council	50.14	58.50	66.85	75.21	91.92	108.64	125.35	150.42
Ramsbury Parish Council	56.97	66.46	75.96	85.45	104.44	123.43	142.42	170.90
Redlynch Parish Council	28.82	33.62	38.43	43.23	52.84	62.44	72.05	86.46
Rowde Parish Council	65.29	76.17	87.05	97.93	119.69	141.45	163.22	195.86
Royal Wootton Bassett Town Council	194.09	226.43	258.78	291.13	355.83	420.52	485.22	582.26
Rushall Parish Council	79.23	92.44	105.64	118.85	145.26	171.67	198.08	237.70
Salisbury City Council	254.77	297.23	339.69	382.15	467.07	551.99	636.92	764.30
Savernake Parish Council	6.34	7.40	8.45	9.51	11.62	13.74	15.85	19.02
Seagry Parish Council	87.85	102.49	117.13	131.77	161.05	190.33	219.62	263.54
Sedgehill & Semley Parish Council	38.43	44.83	51.24	57.64	70.45	83.26	96.07	115.28
Seend Parish Council	30.17	35.20	40.23	45.26	55.32	65.38	75.43	90.52
Semington Parish Council	25.35	29.58	33.80	38.03	46.48	54.93	63.38	76.06
Shalbourne Parish Council	20.09	23.44	26.79	30.14	36.84	43.54	50.23	60.28
Sherrington Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sherston Parish Council	87.19	101.73	116.26	130.79	159.85	188.92	217.98	261.58
Shrewton Parish Council	43.35	50.57	57.80	65.02	79.47	93.92	108.37	130.04

	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)	(£)	(£)	(£)	(£)
Wiltshire Council (inclusive of Adult Social Care Levy)		1,467.66					3,144.98	
Office of the Police & Crime Commissioner for Wiltshire & Swindon	188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Town & Parish Council (Average)	120.79	140.93	161.06	181.19	221.45	261.72	301.98	362.38
Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Council Tax Charge by band per Parish/Town Council								
Sopworth Parish Meeting	4.75	5.54	6.33	7.12	8.70	10.28	11.87	14.24
South Newton Parish Council	28.37	33.10	37.83	42.56	52.02	61.48	70.93	85.12
South Wraxall Parish Council	15.81	18.45		23.72	28.99		39.53	47.44
Southwick Parish Council	29.88	34.86		44.82	54.78		74.70	89.64
St. Paul Malmesbury Without Parish Council	9.85	11.50	13.14	14.78	18.06	21.35	24.63	29.56
Stanton St. Bernard Parish Council	32.55	37.98	43.40	48.83	59.68	70.53	81.38	97.66
Stanton St. Quintin Parish Council	23.80	27.77	31.73	35.70	43.63	51.57	59.50	71.40
Stapleford Parish Council	31.42	36.66	41.89	47.13	57.60	68.08	78.55	94.26
Staverton Parish Council	30.52	35.61	40.69	45.78	55.95	66.13	76.30	91.56
Steeple Ashton Parish Council	48.29	56.34	64.39	72.44	88.54	104.64	120.73	144.88
Steeple Langford Parish Council	18.52	21.61	24.69	27.78	33.95	40.13	46.30	55.56
Stert Parish Council	14.54	16.96		21.81	26.66	31.50	36.35	43.62
Stockton Parish Council	7.40	8.63	9.87	11.10	13.57	16.03	18.50	22.20
Stourton Parish Council	48.13	56.15	64.17	72.19	88.23	104.27	120.32	144.38
Stratford Tony Parish Meeting	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sutton Benger Parish Council	21.29	24.83	28.38	31.93	39.03	46.12	53.22	63.86
Sutton Mandeville Parish Council	12.99	15.15	17.32	19.48	23.81	28.14	32.47	38.96
Sutton Veny Parish Council	37.72	44.01	50.29	56.58	69.15	81.73	94.30	113.16
Swallowcliffe Parish Council	33.05	38.55	44.06	49.57	60.59	71.60	82.62	99.14
Teffont Parish Council	63.64	74.25	84.85	95.46	116.67	137.89	159.10	190.92
Tidcombe & Fosbury Parish Meeting	0.00	0.00		0.00	0.00	0.00	0.00	0.00
Tidworth Town Council	135.15	157.67	180.20	202.72	247.77	292.82	337.87	405.44
Tilshead Parish Council	39.68	46.29	52.91	59.52	72.75	85.97	99.20	119.04
Tisbury Parish Council	96.79	112.92	129.05	145.18	177.44	209.70	241.97	290.36
Tockenham Parish Council	65.89	76.87	87.85	98.83	120.79	142.75	164.72	197.66
Tollard Royal Parish Council	49.13	57.31	65.50	73.69	90.07	106.44	122.82	147.38
Trowbridge Town Council	196.05	228.72	261.40	294.07	359.42	424.77	490.12	588.14
Upavon Parish Council	46.83	54.64	62.44	70.25	85.86	101.47	117.08	140.50

Band A   Band B   Band C   Band F   Band F   Band F   Band F   C   C   C   C   C   C   C   C   C	3 , ,								
Council Tax Schedule 2052/56   (E)		Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Wiltshire Council (Inclusive of Adult Social Care Levy)  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftice of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftic of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftic of the Police & Crime Commissioner for Wiltshire & Swindon  (Fiftic of the Police & Crime Commission & Fiftic of the Police & Crime Commission & Fiftic & Fift	Council Tax Schedule 2025/26	(£)	(£)	(£)	(£)				(£)
Office of the Police & Crime Commissioner for Wiltshire & Swindon   188.85   220.32   251.80   283.27   346.22   409.17   472.12   566.64	Wiltshire Council (inclusive of Adult Social Care Levy)			1,677.32					
Town   Parish Council (Average)   120.79   140.93   161.06   181.19   221.45   261.72   301.98   362.38   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,171.91   2,443.40   2,986.37   3,529.36   4,072.33   4,886.80   1,628.94   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.44   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   2,186.34   1,900.43   1,		188.85	220.32	251.80	283.27	346.22	409.17	472.12	566.54
Total	Dorset & Wiltshire Fire and Rescue Authority	61.30	71.52	81.73	91.95	112.38	132.82	153.25	183.90
Council Tax Charge by band per Parish/Town Council   23.0	Town & Parish Council (Average)	120.79	140.93	161.06	181.19	221.45	261.72	301.98	362.38
Upper Deverills Joint Parish Council         30.15         35.18         40.20         45.23         55.28         65.33         75.38         90.46           Upton Lovell Parish Council         23.98         27.98         31.97         35.97         43.96         51.96         59.95         71.94           Upton Scudamore Parish Council         70.76         82.55         94.35         106.14         129.73         153.31         176.90         212.28           Warminster Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Ashton Parish Council         125.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Knoyle Parish Council         45.66         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Lavington Parish Council         40.58         47.34         54.11         60.87         72.84         89.03         105.21         121.40         145.68	Total	1,628.94	1,900.43	2,171.91	2,443.40	2,986.37	3,529.36	4,072.33	4,886.80
Upper Deverills Joint Parish Council         30.15         35.18         40.20         45.23         55.28         65.33         75.38         90.46           Upton Lovell Parish Council         23.98         27.98         31.97         35.97         43.96         51.96         59.95         71.94           Upton Scudamore Parish Council         70.76         82.55         94.35         106.14         129.73         153.31         176.90         212.28           Warminster Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Ashton Parish Council         125.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Knoyle Parish Council         45.66         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Lavington Parish Council         40.58         47.34         54.11         60.87         72.84         89.03         105.21         121.40         145.68									
Upton Lovell Parish Council         23.98         27.98         31.97         35.97         43.96         51.96         59.95         71.94           Upton Scudamore Parish Council         29.83         34.81         39.78         44.75         54.69         64.64         74.58         89.50           Wording Fraish Council         70.76         82.55         94.35         106.14         129.73         153.31         176.90         212.28           Warminster Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Ashton Parish Council         25.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.86         170.12         191.38         233.91         276.44         318.97         382.76         60.69         69.36         78.03         95.37         112.71         130.05         156.06         West Tsoly Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         49.58         47.34         47.91         68.27									
Upton Scudamore Parish Council         29 83         34 81         39.78         44.75         54.69         64.64         74.58         89.50           Urchfont Parish Council         70.76         82.55         94.35         106.14         129.73         153.31         176.90         212.28           Warminster Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Ashton Parish Council         25.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Lavington Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           West Day Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           West Day Parish Coun			35.18	40.20	45.23				
Urchfont Parish Council         70.76         82.55         94.35         106.14         129.73         153.31         176.90         212.28           Warminister Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Dean Parish Council         25.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Lawington Parish Council         52.02         60.69         69.36         78.03         95.37         112.71         130.05         156.06           West Lawington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Lawington Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           West Lawington Parish Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           West La									
Warminster Town Council         145.78         170.08         194.37         218.67         267.26         315.86         364.45         437.34           West Ashton Parish Council         25.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Lean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Knoyle Parish Council         52.02         60.69         69.36         78.03         95.37         112.71         130.05         156.06           West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.40         145.68           West Subury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.40         145.68           West Subury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.40									
West Ashton Parish Council         25.34         29.56         33.79         38.01         46.46         54.90         63.35         76.02           West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Knoyle Parish Council         52.02         60.69         69.36         78.03         95.37         112.71         130.05         156.06           West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           Westwood Parish Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westwood Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilsford Cum Lake Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake P									
West Dean Parish Council         127.59         148.85         170.12         191.38         233.91         276.44         318.97         382.76           West Knoyle Parish Council         52.02         60.69         69.36         78.03         95.37         112.71         130.05         156.06           West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           Westbury Town Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westbory Town Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.66           Whiteparish Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Willsford Cum Lake Parish									
West Knoyle Parish Council         52.02         60.69         69.36         78.03         95.37         112.71         130.05         156.06           West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           Westbury Town Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westwood Parish Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.66           Whiteparish Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         52.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilton Town	West Ashton Parish Council								
West Lavington Parish Council         48.56         56.65         64.75         72.84         89.03         105.21         121.40         145.68           West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           Westbury Town Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westwood Parish Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.60           Whiteparish Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilston Town Council         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.68           Wingfield Par									
West Tisbury Parish Council         40.58         47.34         54.11         60.87         74.40         87.92         101.45         121.74           Westbury Town Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westwood Parish Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.66           Whiteparish Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilton Town Council         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.68           Winsterbourne Paris	West Knoyle Parish Council	52.02							
Westbury Town Council         190.52         222.27         254.03         285.78         349.29         412.79         476.30         571.56           Westwood Parish Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.66           Whiteparish Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilton Town Council         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.68           Winstersley Parish Council         20.30         23.68         27.07         30.45         37.22         43.98         50.75         60.90           Winterslow Parish Coun									
Westwood Parish Council         62.22         72.59         82.96         93.33         114.07         134.81         155.55         186.66           Whiteparish Parish Council         34.84         40.65         46.45         52.26         63.87         75.49         87.10         104.52           Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilsford Cum Lake Parish Meeting         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.6           Winsley Parish Council         20.30         23.68         27.07         30.45         37.22         43.98         50.75         66.90           Winterbourne Parish Council         36.38         42.44         48.51         54.57         66.70         78.82         90.95         109.14           Winterbourne St	West Tisbury Parish Council								
Whiteparish Parish Council       34.84       40.65       46.45       52.26       63.87       75.49       87.10       104.52         Wilcot and Huish with Oare Parish Council       34.27       39.99       45.70       51.41       62.83       74.26       85.68       102.82         Wilsford Cum Lake Parish Meeting       5.25       6.12       7.00       7.87       9.62       11.37       13.12       15.74         Wilton Town Council       104.01       121.34       138.68       156.01       190.68       225.35       260.02       312.02         Wingfield Parish Council       65.23       76.10       86.97       97.84       119.58       141.32       163.07       195.68         Winsley Parish Council       20.30       23.68       27.07       30.45       37.22       43.98       50.75       60.90         Winterbourne Parish Council       36.38       42.44       48.51       54.57       66.70       78.82       90.95       109.14         Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Woodtorugh Parish Council       63.89       74.53       85.18       95.83       117.13       138									
Wilcot and Huish with Oare Parish Council         34.27         39.99         45.70         51.41         62.83         74.26         85.68         102.82           Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilton Town Council         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.68           Winsley Parish Council         20.30         23.68         27.07         30.45         37.22         43.98         50.75         60.90           Winterbourne Parish Council         36.38         42.44         48.51         54.57         66.70         78.82         90.95         109.14           Winterbourne Stoke Parish Council         87.73         102.35         116.97         131.59         160.83         190.07         219.32         263.18           Winterslow Parish Council         87.73         102.35         116.97         131.59         160.83         190.07         219.32         263.18           Woodborou	Westwood Parish Council								
Wilsford Cum Lake Parish Meeting         5.25         6.12         7.00         7.87         9.62         11.37         13.12         15.74           Wilton Town Council         104.01         121.34         138.68         156.01         190.68         225.35         260.02         312.02           Wingfield Parish Council         65.23         76.10         86.97         97.84         119.58         141.32         163.07         195.68           Winsley Parish Council         20.30         23.68         27.07         30.45         37.22         43.98         50.75         60.90           Winterbourne Parish Council         36.38         42.44         48.51         54.57         66.70         78.82         90.95         109.14           Winterbourne Stoke Parish Council         87.73         102.35         116.97         131.59         160.83         190.07         219.32         263.18           Winterslow Parish Council         63.89         74.53         85.18         95.83         117.13         138.42         159.72         191.66           Woodborough Parish Council         40.81         47.61         54.41         61.21         74.81         88.41         102.02         122.42           Woodford Parish Council <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>									
Wilton Town Council       104.01       121.34       138.68       156.01       190.68       225.35       260.02       312.02         Wingfield Parish Council       65.23       76.10       86.97       97.84       119.58       141.32       163.07       195.68         Winsley Parish Council       20.30       23.68       27.07       30.45       37.22       43.98       50.75       60.90         Winterbourne Parish Council       36.38       42.44       48.51       54.57       66.70       78.82       90.95       109.14         Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Worton Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.	Wilcot and Huish with Oare Parish Council								
Wingfield Parish Council       65.23       76.10       86.97       97.84       119.58       141.32       163.07       195.68         Winsley Parish Council       20.30       23.68       27.07       30.45       37.22       43.98       50.75       60.90         Winterbourne Parish Council       36.38       42.44       48.51       54.57       66.70       78.82       90.95       109.14         Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Worton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72	Wilsford Cum Lake Parish Meeting	5.25							
Winsley Parish Council       20.30       23.68       27.07       30.45       37.22       43.98       50.75       60.90         Winterbourne Parish Council       36.38       42.44       48.51       54.57       66.70       78.82       90.95       109.14         Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Worton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72.80       87.36         Wylye Parish Council       24.75       28.87       33.00       37.12       45.37       53.62       61.87									
Winterbourne Parish Council       36.38       42.44       48.51       54.57       66.70       78.82       90.95       109.14         Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Wootton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72.80       87.36         Wylye Parish Council       24.75       28.87       33.00       37.12       45.37       53.62       61.87       74.24         Yatton Keynell Parish Council       28.29       33.01       37.72       42.44       51.87       61.30       70									
Winterbourne Stoke Parish Council       87.73       102.35       116.97       131.59       160.83       190.07       219.32       263.18         Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Wootton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72.80       87.36         Wylye Parish Council       24.75       28.87       33.00       37.12       45.37       53.62       61.87       74.24         Yatton Keynell Parish Council       28.29       33.01       37.72       42.44       51.87       61.30       70.73       84.88									
Winterslow Parish Council       63.89       74.53       85.18       95.83       117.13       138.42       159.72       191.66         Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Wootton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72.80       87.36         Wylye Parish Council       24.75       28.87       33.00       37.12       45.37       53.62       61.87       74.24         Yatton Keynell Parish Council       28.29       33.01       37.72       42.44       51.87       61.30       70.73       84.88									
Woodborough Parish Council       40.81       47.61       54.41       61.21       74.81       88.41       102.02       122.42         Woodford Parish Council       25.06       29.24       33.41       37.59       45.94       54.30       62.65       75.18         Wootton Rivers Parish Council       25.40       29.63       33.87       38.10       46.57       55.03       63.50       76.20         Worton Parish Council       29.12       33.97       38.83       43.68       53.39       63.09       72.80       87.36         Wylye Parish Council       24.75       28.87       33.00       37.12       45.37       53.62       61.87       74.24         Yatton Keynell Parish Council       28.29       33.01       37.72       42.44       51.87       61.30       70.73       84.88									
Woodford Parish Council         25.06         29.24         33.41         37.59         45.94         54.30         62.65         75.18           Wootton Rivers Parish Council         25.40         29.63         33.87         38.10         46.57         55.03         63.50         76.20           Worton Parish Council         29.12         33.97         38.83         43.68         53.39         63.09         72.80         87.36           Wylye Parish Council         24.75         28.87         33.00         37.12         45.37         53.62         61.87         74.24           Yatton Keynell Parish Council         28.29         33.01         37.72         42.44         51.87         61.30         70.73         84.88									
Wootton Rivers Parish Council         25.40         29.63         33.87         38.10         46.57         55.03         63.50         76.20           Worton Parish Council         29.12         33.97         38.83         43.68         53.39         63.09         72.80         87.36           Wylye Parish Council         24.75         28.87         33.00         37.12         45.37         53.62         61.87         74.24           Yatton Keynell Parish Council         28.29         33.01         37.72         42.44         51.87         61.30         70.73         84.88									
Worton Parish Council         29.12         33.97         38.83         43.68         53.39         63.09         72.80         87.36           Wylye Parish Council         24.75         28.87         33.00         37.12         45.37         53.62         61.87         74.24           Yatton Keynell Parish Council         28.29         33.01         37.72         42.44         51.87         61.30         70.73         84.88									
Wylye Parish Council         24.75         28.87         33.00         37.12         45.37         53.62         61.87         74.24           Yatton Keynell Parish Council         28.29         33.01         37.72         42.44         51.87         61.30         70.73         84.88									
Yatton Keynell Parish Council 28.29 33.01 37.72 42.44 51.87 61.30 70.73 84.88									
Zeals Parish Council         14.79         17.26         19.72         22.19         27.12         32.05         36.98         44.38									
	Zeals Parish Council	14.79	17.26	19.72	22.19	27.12	32.05	36.98	44.38

		2024/25			2025/26		Concil Tax
			Council Tax			Council Tax	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Aldbourne Parish Council	812.98	54,020.00	66.45	815.10	56,180.00	68.92	3.72%
Alderbury Parish Council	1,039.45	66,307.00	63.79	1,059.50	70,345.00	66.39	4.08%
All Cannings Parish Council	274.59	22,000.00	80.12	271.97	23,000.00	84.57	5.55%
Allington Parish Council	224.85	19,500.00	86.72	223.41	22,510.00	100.76	16.19%
Alton Parish Council	111.49	6,373.00	57.16	112.99	7,438.00	65.83	15.17%
Alvediston Parish Meeting	51.10	0.00	0.00	50.30	0.00	0.00	0.00%
Amesbury Town Council	4,613.06	710,596.00	154.04	4,610.31	807,242.00	175.09	13.67%
Ansty Parish Council	81.31	2,550.00	31.36	82.46	2,450.00	29.71	-5.26%
Ashton Keynes Parish Council	673.02	38,173.00	56.72	695.93	39,473.15	56.72	0.00%
Atworth Parish Council	486.10	36,417.00	74.92	487.61	37,510.00	76.93	2.68%
Avebury Parish Council	227.49	14,689.03	64.57	228.57	14,758.76	64.57	0.00%
Barford St. Martin Parish Council	214.03	10,600.00	49.53	214.11	11,520.00	53.80	8.62%
Baydon Parish Council	308.25	16,940.00	54.96	307.19	19,635.14	63.92	16.30%
Beechingstoke Parish Council	68.28	4,400.00	64.44	69.51	4,400.00	63.30	-1.77%
Berwick Bassett and Winterbourne Monkton Joint Parish Council	110.17	5,434.00	49.32	109.67	5,434.00	49.55	0.47%
Berwick St. James Parish Meeting	83.32	2,000.00	24.00	83.33	2,000.00	24.00	0.00%
Berwick St. John Parish Council	137.42	7,850.00	57.12	137.92	8,200.00	59.45	4.08%
Berwick St. Leonard Parish Meeting	16.21	0.00	0.00	16.35	0.00	0.00	0.00%
Biddestone & Slaughterford Parish Council	258.00	20,022.18	77.61	267.86	20,807.52	77.68	0.09%
Bishops Cannings Parish Council	1,325.87	82,500.00	62.22	1,316.56	85,000.00	64.56	3.76%
Bishopstone Parish Council	278.47	7,500.00	26.93	280.87	10,000.00	35.60	32.19%
Bishopstrow Parish Meeting	70.79	1,600.00	22.60	73.09	1,600.00	21.89	-3.14%
Bowerchalke Parish Council	187.30	5,707.03	30.47	186.75	5,707.03	30.56	0.30%
Box Parish Council	1,774.40	199,547.00	112.46	1,778.29	237,739.00	133.69	18.88%
Boyton Parish Council	83.61	1,450.00	17.34	87.25	1,600.00	18.34	5.77%
Bradford on Avon Town Council	4,146.80	1,132,740.00	273.16	4,177.72	1,243,874.35	297.74	9.00%
Bratton Parish Council	506.30	47,603.00	94.02	500.03	49,898.00	99.79	6.14%
Braydon Parish Meeting	30.74	0.00	0.00	32.04	0.00	0.00	0.00%
Bremhill Parish Council	482.85	15,900.00	32.93	556.40	20,152.81	36.22	9.99%
Brinkworth Parish Council	642.74	29,600.63	46.05	651.35	31,492.77	48.35	4.99%
Britford Parish Council	197.02	9,000.00	45.68	207.27	30,000.00	144.74	216.86%
Broad Hinton and Winterbourne Bassett Joint Parish Council	388.03	15,363.13	39.59	390.00	15,977.21	40.97	3.49%
Broad Town Parish Council	275.21	10,146.00		277.76	10,787.00		5.34%
Broad Chalke Parish Council	321.62	22,300.00	69.34	321.13	18,390.00	57.27	-17.41%

		2024/25			2025/26		Concil Tax
			Council Tax			Council Tax	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Brokenborough Parish Council	103.70	2,711.76	26.15	108.89	2,711.76	24.90	-4.78%
Bromham Parish Council	768.68	62,000.00	80.66	770.75	76,000.00	98.61	22.25%
Broughton Gifford Parish Council	371.17	18,190.59	49.01	371.47	19,115.85	51.46	5.00%
Bulford Parish Council	1,432.42	59,679.14	41.66	1,418.42	62,039.18	43.74	4.99%
Bulkington Parish Council	122.45	15,513.00	126.69	122.35	17,825.00	145.69	15.00%
Burbage Parish Council	852.69	31,324.00	36.74	848.30	33,000.00	38.90	5.88%
Burcombe Parish Council	63.40	3,630.00	57.26	64.00	3,770.00	58.91	2.88%
Buttermere Parish Meeting	30.79	0.00	0.00	31.58	0.00	0.00	0.00%
Calne Town Council	6,355.29	1,438,519.00	226.35	6,705.02	1,744,579.00	260.19	14.95%
Derry Hill & Studley Parish Council	1,518.42	32,980.08	21.72	831.80	44,046.74	52.95	143.78%
Castle Combe Parish Council	171.53	6,000.00	34.98	166.54	6,600.00	39.63	13.29%
Chapmanslade Parish Council	350.58	7,250.00		365.80	7,750.00	21.19	2.47%
Charlton Parish Council	246.36	10,000.00		243.61	9,888.00	40.59	0.00%
Charlton St Peter & Wilsford Parish Council	87.78	1,450.00	16.52	89.32	1,450.00	16.23	-1.76%
Cherhill Parish Council	362.89	20,000.00	55.11	566.89	27,898.49	49.21	-10.71%
Cheverell Magna Parish Council	245.35	16,308.00	66.47	246.85	17,399.00	70.48	6.03%
Chicklade Parish Meeting	40.32	0.00	0.00	40.32	0.00	0.00	0.00%
Chilmark Parish Council	245.71	11,000.00	44.77	241.44	15,400.00	63.78	42.46%
Chilton Foliat Parish Council	209.37	7,917.00	37.81	208.95	8,049.00	38.52	1.88%
Chippenham Town Council - Precepts	13,404.17	4,151,782.00	309.74	13,635.76	4,380,925.00	321.28	3.73%
Chippenham Without Parish Council	91.77	12,000.00	130.76	92.05	12,000.00	130.36	-0.31%
Chirton Parish Council	184.42	13,886.46	75.30	183.93	14,858.00	80.78	7.28%
Chitterne Parish Council	137.76	10,765.00	78.14	144.22	11,269.35	78.14	0.00%
Cholderton Parish Meeting	92.49	5,086.95	55.00	92.32	5,169.92	56.00	1.82%
Christian Malford Parish Council	383.16	23,281.49	60.76	371.82	36,695.86	98.69	62.43%
Chute Forest Parish Council	91.72	5,650.00		91.22	6,200.00	67.97	10.34%
Chute Parish Council	173.51	9,000.00		173.91	12,700.00		40.79%
Clarendon Park Parish Council	136.68	5,116.00	37.43	137.98	5,405.00	39.17	4.65%
Clyffe Pypard & Bushton Parish Council	157.67	4,500.00	28.54	156.62	5,000.00	31.92	11.84%
Codford Parish Council	365.15	20,447.23	56.00	364.71	20,695.20	56.74	1.32%
Colerne Parish Council	941.72	77,249.29	82.03	938.71	82,390.58	87.77	7.00%
Collingbourne Ducis Parish Council	385.37	30,259.87	78.52	386.75	32,753.00	84.69	7.86%
Collingbourne Kingston Parish Council	230.22	16,000.00	69.50	230.52	16,000.00	69.41	-0.13%

		2024/25			2025/26		Concil Tax
			Council Tax			Council Tax	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Compton Bassett Parish Council	114.63	8,000.00	69.79	128.35	9,000.00	70.12	0.47%
Compton Chamberlayne Parish Meeting	61.89	2,800.00	45.24	61.05	3,000.00	49.14	8.62%
Coombe Bissett Parish Council	367.32	13,000.00	35.39	367.51	14,000.00	38.09	7.63%
Corsham Town Council	4,964.34	1,227,300.00	247.22	4,962.54	1,333,847.00	268.78	8.72%
Corsley Parish Council	350.43	15,140.00	43.20	352.63	15,878.00	45.03	4.24%
Coulston Parish Council	84.53	4,042.00	47.82	83.33	5,210.00	62.52	30.74%
Cricklade Town Council	1,671.30	389,677.00	233.16	1,676.23	407,398.00	243.04	4.24%
Crudwell Parish Council	529.16	16,000.00	30.24	531.29	17,640.00	33.20	9.79%
Dauntsey Parish Council	264.27	23,500.00	88.92	261.34	25,500.00	97.57	9.73%
Devizes Town Council	6,078.68	1,259,456.00	207.19	6,100.77	1,342,264.00	220.02	6.19%
Dilton Marsh Parish Council	727.46	32,810.00	45.10	726.76	35,640.00	49.04	8.74%
Dinton Parish Council	313.57	17,000.00	54.21	317.42	13,000.00	40.96	-24.44%
Donhead St Andrew Parish Council	251.33	12,820.00	51.01	256.73	13,424.41	52.29	2.51%
Donhead St. Mary Parish Council	481.87	19,995.00	41.49	489.06	20,935.00	42.81	3.18%
Downton Parish Council	1,409.16	206,450.00	146.51	1,399.19	216,565.00	154.78	5.64%
Durnford Parish Council	191.54	3,817.39	19.93	190.32	4,199.00	22.06	10.69%
Durrington Town Council	2,647.11	275,000.00	103.89	2,625.38	275,000.00	104.75	0.83%
East Kennett Parish Meeting	57.54	0.00	0.00	57.31	0.00	0.00	0.00%
East Knoyle Parish Council	348.28	14,161.06	40.66	357.20	15,248.87	42.69	4.99%
Easterton Parish Council	289.73	23,500.00	81.11	285.34	23,500.00	82.36	1.54%
Easton Grey Parish Meeting	44.11	825.00	18.70	45.31	1,500.00	33.11	77.06%
Easton Royal Parish Council	140.42	9,960.00	70.93	144.41	11,350.00	78.60	10.81%
Ebbesbourne Wake Parish Council	106.82	3,675.00	34.40	105.18	3,675.00	34.94	1.57%
Edington Parish Council	338.38	21,000.00	62.06	337.87	21,000.00	62.15	0.15%
Enford Parish Council	255.10	18,400.00	72.13	255.70	18,460.00	72.19	0.08%
Erlestoke Parish Council	94.59	7,500.00	79.29	95.89	8,500.00	88.64	11.79%
Etchilhampton Parish Council	71.96	3,000.00	41.69	74.93	3,500.00	46.71	12.04%
Everleigh Parish Council	92.18	4,003.24	43.43	93.25	4,220.84	45.26	4.21%
Figheldean Parish Council	231.61	20,358.52	87.90	186.11	20,358.52	109.39	24.45%
Firsdown Parish Council	277.66	27,725.00	99.85	273.83	19,000.00	69.39	-30.51%
Fittleton cum Haxton Parish Council	119.24	7,409.57	62.14	113.65	7,273.60	64.00	2.99%
Fonthill Bishop Parish Meeting	43.87	0.00	0.00	44.06	0.00	0.00	0.00%

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		2024/25			2025/26		Concil Tax
			Council Tax			<b>Council Tax</b>	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Fonthill Gifford Parish Council	62.28	2,280.00	36.61	61.60	2,300.00	37.34	1.99%
Fovant Parish Council	341.70	17,800.00	52.09	344.09	25,717.00	74.74	43.48%
Froxfield Parish Council	145.90	13,000.00	89.10	144.73	13,520.00	93.42	4.85%
Kennet Valley Joint Parish Council	398.65	24,000.00	60.20	399.52	15,000.00	37.55	-37.62%
Grafton Parish Council	337.80	9,950.00	29.46	338.56	9,950.00	29.39	-0.24%
Great Bedwyn Parish Council	590.14	31,000.00	52.53	598.97	31,000.00	51.76	-1.47%
Great Hinton Parish Council	105.31	3,243.55	30.80	106.89	6,144.00	57.48	86.62%
Great Somerford Parish Council	458.83	16,450.00	35.85	463.25	15,300.00	33.03	-7.87%
Great Wishford Parish Council	139.73	4,538.43	32.48	138.03	5,155.42	37.35	14.99%
Grimstead Parish Council	292.99	21,400.00	73.04	299.23	23,380.00	78.13	6.97%
Grittleton Parish Council	302.73	4,401.69	14.54	324.42	4,866.30	15.00	3.16%
Ham Parish Council	117.94	2,000.00	16.96	115.47	2,000.00	17.32	2.12%
Hankerton Parish Council	151.64	4,763.00	31.41	154.58	5,800.00	37.52	19.45%
Heddington Parish Council	208.10	7,803.75	37.50	285.58	11,780.18	41.25	10.00%
Heytesbury and Imber & Knook Joint Parish Council	353.69	20,900.00	59.09	352.36	21,600.00	61.30	3.74%
Heywood Parish Council	312.48	7,400.00	23.68	479.26	11,750.00	24.52	3.55%
Hilmarton Parish Council	317.14	13,500.00	42.57	319.40	13,500.00	42.27	-0.70%
Hilperton Parish Council	1,671.06	26,248.00	15.71	1,693.61	26,248.00	15.50	-1.34%
Hindon Parish Council	245.04	17,850.00	72.85	249.13	18,500.00	74.26	1.94%
Holt Parish Council	723.32	35,000.00	48.39	715.25	36,750.00	51.38	6.18%
Horningsham Parish Council	162.37	29,973.45	184.60	165.67	32,150.00	194.06	5.12%
Hullavington Parish Council	510.52	22,000.00	43.09	507.28	25,000.00	49.28	14.37%
Idmiston Parish Council	956.11	91,816.60	96.03	954.27	100,000.00	104.79	9.12%
Keevil Parish Council	227.43	9,604.37	42.23	233.07	11,317.88	48.56	14.99%
Kilmington Parish Council	142.93	13,498.00	94.44	138.99	14,210.00	102.24	8.26%
Kington Langley Parish Council	373.69	24,895.36	66.62	370.77	26,140.00	70.50	5.82%
Kington St. Michael Parish Council	320.68	53,233.32	166.00	319.88	54,568.32	170.59	2.77%
Lacock Parish Council	502.57	38,824.22	77.25	505.11	40,158.35	79.50	2.91%
Landford Parish Council	966.38	74,000.00		964.32	79,920.00	82.88	8.24%
Langley Burrell Without Parish Council	181.26	16,379.00	90.36	181.13	19,324.00	106.69	18.07%
Latton Parish Council	256.45	15,472.00		257.40	15,528.94	60.33	0.00%
Laverstock & Ford Parish Council	3,951.96	321,204.00	81.28	3,979.67	370,951.00	93.21	14.68%
Lea, Garsdon & Cleverton Parish Council	427.16	15,600.00	36.52	422.89	16,206.00	38.32	4.93%
Leigh Parish Council	153.49	4,179.00	27.23	152.40	4,179.00	27.42	0.70%
Limpley Stoke Parish Council	313.02	23,649.00	75.55	311.99	24,750.00	79.33	5.00%

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		2024/25		2025/26			Concil Tax
			Council Tax			Council Tax	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Little Bedwyn Parish Council	134.97	3,095.00	22.93	136.84	3,095.00	22.62	-1.35%
Little Cheverell Parish Council	84.83	6,370.00	75.09	84.93	8,582.00	101.05	34.57%
Little Somerford Parish Council	186.72	11,500.00	61.59	184.73	12,000.00	64.96	5.47%
Longbridge Deverill Parish Council	418.64	8,580.00	20.49	419.04	9,000.00	21.48	4.83%
Luckington & Alderton Parish Council	302.44	11,561.00	38.23	300.00	12,615.00	42.05	9.99%
Ludgershall Town Council	1,860.11	263,299.00	141.55	1,918.61	288,026.00	150.12	6.05%
Lydiard Millicent Parish Council	785.40	64,151.00	81.68	784.40	67,055.00	85.49	4.66%
Lydiard Tregoz Parish Council	227.00	11,650.00	51.32	228.33	11,650.00	51.02	-0.58%
Lyneham And Bradenstoke Parish Council	1,562.87	61,579.00	39.40	1,585.14	65,966.00	41.62	5.63%
Maiden Bradley and Yarnfield Parish Council	147.77	29,478.85	199.49	148.96	30,309.00	203.47	2.00%
Malmesbury Town Council	2,269.16	538,852.00	237.47	2,345.75	572,454.00	244.04	2.77%
Manningford Parish Council	191.58	8,900.00	46.46	191.33	9,500.00	49.65	6.87%
Marden Parish Council	58.12	2,000.00	34.41	58.82	2,000.00	34.00	-1.19%
Market Lavington Parish Council	779.13	75,523.00	96.93	768.77	80,132.00	104.23	7.53%
Marlborough Town Council	3,607.47	890,930.00	246.97	3,591.13	931,251.00	259.32	5.00%
Marston Meysey Parish Meeting	106.22	4,806.00		107.35	4,806.00		-1.06%
Marston Parish Council	82.64	2,668.00		83.85	2,980.00	35.54	10.10%
Melksham Town Council	5,960.79	1,047,270.00	175.69	5,963.43	1,192,200.00	199.92	13.79%
Melksham Without Parish Council	2,908.62	261,592.00		2,980.90	285,135.00	95.65	6.35%
Mere Parish Council	1,261.46	200,176.56		1,278.57	213,006.30	166.60	4.98%
Mildenhall Parish Council	222.04	20,000.00		224.76	20,000.00	88.98	-1.21%
Milston Parish Meeting	57.19	1,300.00	22.73	58.98	1,350.00	22.89	0.70%
Milton Lilbourne Parish Council	276.07	16,647.02	60.30	277.86	17,100.00	61.54	2.06%
Minety Parish Council	700.62	18,053.90		697.16	18,053.90		0.50%
Monkton Farleigh Parish Council	188.20	10,000.00		185.41	11,000.00	59.33	11.67%
Netheravon Parish Council	378.20	28,564.00		428.26	31,885.00		-1.43%
Netherhampton Parish Council	69.62	2,970.00		75.96	2,970.00	39.10	-8.35%
Nettleton Parish Council	363.07	6,615.00		356.65	6,615.00	18.55	1.81%
Newton Tony Parish Council	169.25	17,400.00	102.81	174.49	18,657.00	106.92	4.00%
North Bradley Parish Council	673.89	18,371.00	27.26	687.70	20,555.00	29.89	9.65%
North Newnton Parish Council	208.32	16,200.00	77.76	209.75	16,200.00	77.23	-0.68%
North Wraxall Parish Council	217.94	13,712.00	62.92	218.16	14,433.52	66.16	5.15%
Norton & Foxley Parish Meeting	68.66	0.00		67.86	0.00	0.00	0.00%
Norton Bavant Parish Meeting	57.58	0.00		57.98	0.00	0.00	0.00%
Oaksey Parish Council	271.21	19,250.00	70.98	268.62	19,250.00	71.66	0.96%

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		2024/25			2025/26			
			Council Tax			Council Tax	Increase/	
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)	
Odstock Parish Council	253.73	18,500.00	72.91	252.86	20,000.00	79.10	8.49%	
Ogbourne St. Andrew Parish Council	195.78	4,434.42	22.65	198.18	4,601.74	23.22	2.52%	
Ogbourne St. George Parish Council	231.22	14,082.00	60.90	230.72	16,050.00	69.56	14.22%	
Orcheston Parish Council	110.89	3,459.00	31.19	110.98	3,403.00	30.66	-1.70%	
Patney Parish Council	68.68	1,500.00	21.84	69.50	1,550.00	22.30	2.11%	
Pewsey Parish Council	1,586.52	157,500.00	99.27	1,587.41	162,000.00	102.05	2.80%	
Pitton & Farley Parish Council	376.60	18,143.00	48.18	387.28	21,501.00	55.52	15.23%	
Potterne Parish Council	604.24	32,000.00	52.96	605.48	32,065.00	52.96	0.00%	
Poulshot Parish Council	159.55	14,800.00	92.76	162.96	15,000.00	92.05	-0.77%	
Preshute Parish Council	86.12	4,660.05	54.11	86.35	5,046.29	58.44	8.00%	
Purton Parish Council	2,492.15	380,600.00		2,529.67	399,865.00		3.50%	
Quidhampton Parish Council	154.20	11,500.00		152.90	11,500.00		0.84%	
Ramsbury Parish Council	944.02	76,380.00		948.99	81,086.50		5.61%	
Redlynch Parish Council	1,214.01	50,000.00	41.19	1,214.46	52,500.00		4.95%	
Rowde Parish Council	496.92	40,553.64	81.61	500.06	48,970.88	97.93	20.00%	
Royal Wootton Bassett Town Council	4,751.37	1,188,235.00	250.08	4,776.52	1,390,589.00	291.13	16.41%	
Rushall Parish Council	75.79	8,842.20	116.67	75.45	8,967.00	118.85	1.87%	
Salisbury City Council	15,502.31	5,642,672.00		15,553.49	5,943,766.00		4.99%	
Savernake Parish Council	136.18	1,300.00		136.75	1,300.00	9.51	-0.42%	
Seagry Parish Council	172.95	21,500.00	124.31	182.13	24,000.00	131.77	6.00%	
Sedgehill & Semley Parish Council	303.39	16,500.00		294.91	17,000.00		5.98%	
Seend Parish Council	530.31	21,234.00		527.00	23,851.00		13.04%	
Semington Parish Council	408.10	14,500.00	35.53	407.60	15,500.00	38.03	7.04%	
Shalbourne Parish Council	326.98	10,000.00		331.74	10,000.00		-1.44%	
Sherrington Parish Meeting	35.83	0.00		38.22	0.00		0.00%	
Sherston Parish Council	730.65	88,521.00		725.57	94,894.00		7.96%	
Shrewton Parish Council	767.39	35,000.00		768.94	50,000.00		42.56%	
Sopworth Parish Meeting	70.98	500.00		70.23	500.00		1.14%	
South Newton Parish Council	236.16	9,571.79		232.35	9,888.82	42.56	5.01%	
South Wraxall Parish Council	229.13	5,000.00		231.85	5,500.00		8.71%	
Southwick Parish Council	771.58	27,044.00		780.82	35,000.00		27.87%	
St. Paul Malmesbury Without Parish Council	1,065.03	16,043.00		1,085.09	16,043.00		-1.86%	
Stanton St. Bernard Parish Council	84.26	4,080.00		83.55	4,080.00		0.85%	
Stanton St. Quintin Parish Council	280.32	8,000.00		280.10	10,000.00		25.09%	
Stapleford Parish Council	142.80	6,760.00	47.34	141.51	6,670.00	47.13	-0.44%	

	2024/25				Concil Tax		
			Council Tax			Council Tax	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Staverton Parish Council	686.07	29,082.51	42.39	683.73	31,302.00	45.78	8.00%
Steeple Ashton Parish Council	446.73	28,139.00	62.99	450.70	32,649.00	72.44	15.00%
Steeple Langford Parish Council	253.45	5,500.00	21.70	252.42	7,012.23	27.78	28.02%
Stert Parish Council	91.69	1,500.00	16.36	91.72	2,000.00	21.81	33.31%
Stockton Parish Council	90.78	1,000.00	11.02	90.11	1,000.00	11.10	0.73%
Stourton Parish Council	98.85	5,419.00	54.82	98.10	7,082.00	72.19	31.69%
Stratford Tony Parish Meeting	33.01	0.00	0.00	33.32	0.00	0.00	0.00%
Sutton Benger Parish Council	578.12	15,499.66	26.81	581.56	18,569.62	31.93	19.10%
Sutton Mandeville Parish Council	141.01	2,200.00	15.60	138.62	2,700.00	19.48	24.87%
Sutton Veny Parish Council	331.60	18,703.00	56.40	334.45	18,923.00	56.58	0.32%
Swallowcliffe Parish Council	111.67	4,931.00	44.16	110.95	5,500.00	49.57	12.25%
Teffont Parish Council	163.39	13,925.73	85.23	165.85	15,832.04	95.46	12.00%
Tidcombe & Fosbury Parish Meeting	58.77	0.00	0.00	57.09	0.00		0.00%
Tidworth Town Council	2,857.86	577,200.00	201.97	2,847.25	577,200.00	202.72	0.37%
Tilshead Parish Council	133.83	7,750.00	57.91	132.50	7,886.00	59.52	2.78%
Tisbury Parish Council	948.72	130,570.00	137.63	959.08	139,239.00		5.49%
Tockenham Parish Council	121.48	12,000.00	98.78	121.42	12,000.00	98.83	0.05%
Tollard Royal Parish Council	67.13	4,800.00	71.50	67.12	4,946.00	73.69	
Trowbridge Town Council	11,930.54	3,228,982.00	270.65	11,879.11	3,493,338.00	294.07	8.65%
Upavon Parish Council	514.52	31,000.00	60.25	519.57	36,500.00	70.25	16.60%
Upper Deverills Joint Parish Council	175.91	8,000.00	45.48	176.88	8,000.00	45.23	-0.55%
Upton Lovell Parish Council	88.66	3,182.70	35.90	90.76	3,265.00		0.19%
Upton Scudamore Parish Council	143.37	6,000.00	41.85	145.26	6,500.00		
Urchfont Parish Council	563.16	58,033.64	103.05	565.65	60,038.09		3.00%
Warminster Town Council	6,387.19		216.50	6,505.06	1,422,450.00	218.67	1.00%
West Ashton Parish Council	231.17	8,368.35	36.20	229.82	8,735.46		5.00%
West Dean Parish Council	105.99	19,000.00	179.26	103.25	19,760.00		
West Knoyle Parish Council	70.08	5,400.00	77.05	72.66	5,670.00		1.27%
West Lavington Parish Council	525.93	36,483.00	69.37	513.54	37,406.00		5.00%
West Tisbury Parish Council	281.93	16,000.00	56.75	279.27	17,000.00	60.87	7.26%
Westbury Town Council	5,635.08	1,361,560.00	241.62	5,526.72	1,579,403.00	285.78	18.28%
Westwood Parish Council	480.94	45,000.00	93.57	482.15	45,000.00		
Whiteparish Parish Council	720.81	42,448.50	58.89	716.54	37,448.50		
Wilcot and Huish with Oare Parish Council	273.81	9,514.00	34.75	274.77	14,125.00	51.41	47.94%

# Appendix C

	2024/25				Concil Tax		
			Council Tax			<b>Council Tax</b>	Increase/
Parish/Town Council	Tax Base	Precept (£)	Band D (£)	Tax Base	Precept (£)	Band D (£)	(Decrease)
Wilsford Cum Lake Parish Meeting	64.00	500.00	7.81	63.52	500.00	7.87	0.77%
Wilton Town Council	1,576.78	246,000.00	156.01	1,586.57	247,520.00	156.01	0.00%
Wingfield Parish Council	165.96	16,000.00	96.41	163.54	16,000.00	97.84	1.48%
Winsley Parish Council	932.78	28,403.16	30.45	940.01	28,623.30	30.45	0.00%
Winterbourne Parish Council	577.26	30,000.00	51.97	583.39	31,835.00	54.57	5.00%
Winterbourne Stoke Parish Council	82.88	9,090.00	109.68	83.59	11,000.00	131.59	19.98%
Winterslow Parish Council	939.13	90,000.00	95.83	948.71	90,914.88	95.83	0.00%
Woodborough Parish Council	150.65	9,750.00	64.72	155.20	9,500.00	61.21	-5.42%
Woodford Parish Council	237.02	8,485.32	35.80	240.98	9,059.00	37.59	5.00%
Wootton Rivers Parish Council	128.94	4,679.23	36.29	133.11	5,071.49	38.10	4.99%
Worton Parish Council	267.16	11,610.00	43.46	273.57	11,950.00	43.68	0.51%
Wylye Parish Council	216.58	8,000.00	36.94	215.52	8,000.00	37.12	0.49%
Yatton Keynell Parish Council	406.96	16,766.75	41.20	403.09	17,107.14	42.44	3.01%
Zeals Parish Council	280.43	6,247.74	22.28	281.51	6,247.64	22.19	-0.40%
TOTAL / AVERAGE	194,423.87	32,726,540.10	168.33	195,453.54	35,413,785.64	181.19	7.64%

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# Agenda Item 11

### Wiltshire Council

### **Full Council**

### **25 February 2025**

### Pay Policy Statement 2025/2026

### **Executive Summary**

Under section 38 of the Localism Act 2011 every local authority was required to prepare and publish a pay policy statement for the financial year 2012/2013 and this must be updated in each subsequent financial year.

The statement has been updated for 2025/2026 with minor revisions.

Workforce numbers such as total number of council employees have been updated where applicable.

### **Proposals**

That Council approve the updated pay policy statement set out in Appendix 1 ready for publication on the Wiltshire Council website.

### **Reason for Proposals**

The proposals set out in the report and pay policy statement reflect the council's commitment to openness and transparency and meets the requirements of the Localism Act 2011 and the Code of Recommended Practice for Local Authorities on Data Transparency 2015.

### **Lucy Townsend**

**Chief Executive (Head of Paid Service)** 

### Wiltshire Council

### Council

### **25 February 2025**

### Pay Policy Statement 2025/2026

### **Purpose of Report**

1. This report presents the updated pay policy statement for 2025/2026 which applies to all non-schools employees of Wiltshire Council, except for centrally employed teachers who are covered by the teachers' pay policy.

### Relevance to the Council's Business Plan

2. An effective pay policy statement supports the workforce strategy and the Business Plan objective of having an efficient and healthy organisation.

### **Background**

- 3. Under section 38 of the Localism Act 2011 every local authority is required to update their pay policy statement each financial year.
- 4. Wiltshire Council published its first pay policy statement in February 2012 and has continued to publish them annually since then. The council is required to publish an updated policy by 1 April 2025.
- 5. The legislation requires that final approval of the pay policy statement is sought from Full Council.

### Main Considerations for the Council

- 6. There are minimal changes this year, with the main updates to the pay policy statement highlighted in appendix 1 and outlined below:
- 7. Throughout the policy, the total number of council employees, apprenticeships, statutory rates and pay rates and pay ratios where applicable have been updated.
- 8. The ratio for the highest to lowest paid has decreased slightly this year due to the appointment of the new Chief Executive and alongside this, the NJC pay award of £1,290 on all points regardless of salary resulting in the lowest point (Grade B) receiving a 5.7% increase compared with the 2.5% for HAY graded staff.
- 9. A revised introduction to include reference to the Employment Rights Bill and continued developments with the Oracle ERP system.
- 10. The pay policy statement will be updated with the annual budget once this has been agreed at Full Council.

11. At its meeting on 29 January 2025, Staffing Policy Committee approved the pay policy statement and recommended it be put forward for approval by Full Council.

### Safeguarding Implications

12. There are no safeguarding implications identified in relation to the pay policy statement.

### **Public Health Implications**

13. There are no public health implications identified in relation to the pay policy statement.

### **Procurement Implications**

14. There are no procurement implications identified in relation to the pay policy statement.

### **Equalities Impact of the Proposal**

15. The pay policy statement was equality impact assessed on 1 February 2012 and no negative impacts were identified. No significant changes have been made requiring a further assessment for 2025/2026.

### **Environmental and Climate Change Considerations**

16. There are no environmental or climate change considerations in relation to the pay policy statement.

### **Workforce Implications**

17. The employment policies referred to within the pay policy statement are already in existence and therefore there are no additional workforce implications.

### Risks that may arise if the proposed decision and related work is not taken

- 18. The council is required to publish the pay policy statement in order to comply with the requirements of the Localism Act 2011.
- 19. The pay policy statement clearly outlines that the employment terms and allowances for senior staff are not more beneficial than those of the lowest paid staff.

# Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

20. There are no risks identified in relation to the pay policy statement.

### **Financial Implications**

21. The employment policies referred to within the pay policy statement are already in existence and therefore there are no financial implications.

### **Legal Implications**

22. The employment policies referred to within the pay policy statement are already in existence and there are no legal implications.

### **Overview and Scrutiny Engagement**

23. There is no requirement for engagement with overview and scrutiny in relation to the pay policy statement.

### **Conclusions**

- 24. The council is required to update its pay policy statement in order to comply with the requirements of the Localism Act 2011.
- 25. Full Council is recommended to approve the pay policy statement 2025/2026.

### Tamsin Kielb - Director HR&OD

Report Author: Laura Fisher, HR&OD Strategy Manager, laura.fisher@wiltshire.gov.uk

### **Appendices**

Appendix 1 – Pay Policy Statement (2025/2026 update)

### **Background Papers**

None



# Wiltshire Council Human Resources Pay Policy Statement

This policy can be made available in other languages and formats such as large print and audio on <u>request</u>.

### What is it?

The pay policy statement sets out the council's approach to pay and reward for senior managers and the lowest paid employees for the financial year 2025-2026.

Its purpose is to provide a clear and transparent policy, which demonstrates accountability and value for money. The policy also meets the council's obligations under the Localism Act 2011 and the Code of Recommended Practice for Local Authorities on Data Transparency.

The pay policy is applicable to council staff and does not include schools support staff or teachers.

The pay policy statement sets out the authority's policies for council staff for the financial year relating to:

- the remuneration of chief officers
- the remuneration of the lowest-paid employees
- the relationship between the remuneration of chief officers and employees who are not chief officers.
- the remuneration of the Coroner (as part of the statutory resourcing requirement of the Coronial Service). Note: the Coroner is judicially independent and is therefore not an employee of the Council rather a locally administered branch of the national judiciary.

Remuneration for the purposes of this statement includes the following elements:

- basic salary
- any other allowances arising from employment

The term "chief officer" in this instance applies to more posts than the usual council definition, and includes the following senior manager roles:

Chief Executive
Corporate Director
Director
Head of Service
Some strategic and technical specialist roles



The term "lowest paid employees" refers to those employees on the lowest pay point of our grading system, which is currently at £23,656 per annum.

### Go straight to the section:

- Introduction
- Who does it apply to?
- When does it apply?
- What are the main points?
- The level and elements of remuneration for employees
- Remuneration on recruitment
- Increases and additions to remuneration
- The use of performance-related pay
- The use of bonuses
- The Apprenticeship Levy
- The approach to the payment of employees on their ceasing to be employed by the authority
- The pension scheme
- Any other allowances arising from employment
- Governance arrangements
- The publication of and access to information relating to remuneration of chief officers
- The relationship between the remuneration of chief officers and employees who are not chief officers.

### Introduction

Wiltshire Council is a large and complex organisation providing a wide range of services to the community, with a current annual net budget of around £490m (2024/25).

To deliver these services around 5,568 people work for the council (non-schools) on permanent, fixed term and variable hours contracts in a variety of diverse roles such as corporate director, social worker, public protection officer and general cleaner.

The council published its ten-year Business Plan 2022 - 2032 in February 2022. At the heart of the business plan is the vision to create stronger communities, and the plan sets out the key actions that will be taken to deliver this. The ten-year plan works to four main priorities under the banner of improving lives through stronger communities. The four key priorities of the business plan are empowered people, resilient society, thriving economy and sustainable environment. Also reflected in the plan, are the significant challenges that the council will face over the coming years and the changes to the way the council will have to operate to manage these.

The coming year will continue to be challenging as the council continues to transform and find innovative ways to deliver services within strict budget/cost parameters with



changing demands. The cost of living and energy crisis continues to provide further challenge as the council looks at ways to provide support to both residents and staff.

The current national candidate-driven job market with skills shortages in key areas brings further challenge for the council to compete for top talent and to attract and retain a workforce with the right skills and behaviours. The council's workforce strategy aims to ensure that it has the right people in the right place at the right time with the right skills and capabilities to deliver the business plan, now and in the future. This is underpinned by Our Identity which sets out how staff are expected to lead, work and act together to deliver great services and drive excellence.

The forthcoming legislation with the Employment Rights Bill encompassing 28 individual reforms is still subject to parliamentary debate and public consultations before the full impact of the planned legislation is known. The government plans a review of parental leave, carers leave and TUPE regulations as well as the configuration of the legal distinction between employees and workers. The council will continue to follow these proposals contributing to relevant consultations, and assess the outcomes to determine the impact of the measures on any existing policies and practices.

Alongside this, following the implementation of the Oracle ERP system, the council continues to develop system capabilities in order to streamline processes and drive efficiencies.

### Who does it apply to?

This pay policy statement applies to all non-schools' employees of Wiltshire Council with the exception of Centrally Employed Teachers, who are covered by the Teacher's Pay Policy.

This pay policy statement also applies to the judicially independent Coroner.

### When does it apply?

This pay policy statement was first published in February 2012 and is updated on an annual basis. It has now been updated for the financial year 2025/2026.

### What are the main points?

- 1. This pay policy statement sets out the pay policies which apply to both the lowest paid and highest paid employees within the council.
- 2. In many cases the pay policies are the same for all employees. Where there are differences, these have been clearly outlined below.

### The level and elements of remuneration for employees



- 3. In line with good employment practice the majority of jobs within the council have been evaluated using a job evaluation scheme. This is to ensure that jobs are graded fairly and equitably, and that the council complies with the Equal Pay Act.
- 4. A small number of jobs i.e. centrally employed teachers and Soulbury staff are subject to national salary scales which determine the pay for each job, and therefore the evaluation schemes do not apply.
- 5. The council uses two job evaluation schemes in order to rank jobs.

### HAY job evaluation scheme:

- 6. The HAY job evaluation scheme is used to evaluate senior manager jobs within the council (currently 143 employees), which include the following roles:
  - Chief Executive
  - Corporate Director
  - Director
  - Head of Service
  - Strategic and technical specialists
- 7. Each job is assessed by a panel of HAY trained evaluators. The evaluators consider the job against each HAY element and sub-element against a suite of agreed role profiles and apply the description and points that best fit the job being evaluated.
- 8. The HAY Group periodically carry out quality control checks to ensure the consistency of job scores in line with the conventions of the scheme.
- 9. The job score determines the grade for the job. There are 10 HAY grades each currently containing a salary range over 3 spinal column points.
- 10. Details of the HAY evaluation scheme, role profiles and salary bands are published on HR Direct.
- 11. The council's policy is to pay the median market rate for the jobs evaluated using the HAY job evaluation scheme and aims to ensure that the pay scales for HAY graded posts are sensitive to labour market pressures. There can be exceptions to this where the market pay for particular roles indicates that pay above the median may be required, in which case a market pay scale may be applied.
- 12. There are no national pay scales for senior roles so pay is a matter for local determination. Pay scales for HAY grades are determined using the HAY pay databank for the public and not for profit sector and increases are capped in line with the NJC pay award unless market pay data identifies a significant drift or where difficulties are identified with recruitment and retention of staff at this level. This is in line with the council's market supplements policy.

### Coroner



13. For the Coroner, there is a separate Joint National Committee for Coroners which issues Coroner pay guidance for the Council to use in determining pay and increases. In addition, a 'complexity review' of the coronial area may be undertaken to review the remuneration level.

### **Greater London Provincial Council job evaluation (GLPC) scheme:**

- 14. The GLPC job evaluation scheme is used to evaluate the majority of jobs within the council.
- 15. Each job is assessed by a panel of three trained GLPC evaluators. The evaluators consider each job against a suite of agreed role profiles that set out the level of work required of the grade within the relevant job family.
- 16. The council aims to ensure that the GLPC scheme is appropriately applied and that there is continuity and consistency in the results. The evaluation process has been checked externally by job evaluation specialists in the Southwest Councils organisation.
- 17. There are eight job families each containing a set of evaluated role profiles stating the requirements at each grade.
- 18. For jobs evaluated using the GLPC job evaluation scheme the national pay spine determined by the National Joint Council (NJC) for Local Government Services forms the basis of the council's pay and grading model, and changes to the national pay spine are subject to annual pay negotiations.
- 19. There are 14 grades, with all grades containing three increments except for the lowest grade which has one incremental point.

### Remuneration on recruitment

- 20. The same recruitment policies apply to all employees who take up a new appointment with the council, regardless of grade.
- 21. The council advertises all posts through the careers website and may also employ a recruitment agency to provide a shortlist of candidates for senior manager jobs.
- 22. Candidates are normally appointed on the minimum salary of the grade for the post.
- 23. If a candidate is currently being paid above the minimum salary of the post they are applying for, the appointment may in some circumstances be on the next increment point above their current salary, subject to the maximum salary of the grade and the skills and experience offered by the preferred candidate. This would require the authorisation of the Director HR&OD.



- 24. The recruitment procedure for Chief Executive, Corporate Director and Director posts is undertaken by the Officer Appointments Committee. This committee represents the council for all Chief Executive and Director appointments. Once an appointment is proposed by the committee, Cabinet is required to ratify the decision and salary level within the band before the appointment is confirmed.
- 25. In line with the requirements of the Localism Act 2011, all chief and senior officer jobs, including those paid over £100,000 per year, are evaluated using the HAY job evaluation scheme. The job is then allocated the appropriate existing HAY grade and pay band, and a salary offer will only be made within that pay band. There can be exceptions to this where the market pay for particular roles indicates that pay above the median may be required, in which case a market pay scale may be applied.
- 26. Where it is necessary for any newly appointed employee in a hard to recruit role to relocate more than 15 miles in order to take up an appointment, the council may contribute towards relocation expenses where the post meets the criteria outlined in moving home allowances for new employees policy.

### **Market supplements**

- 27. The council has a market supplement policy which stipulates that if there are recruitment and retention difficulties for a particular post, and it is shown that the council are paying below the market rate for the job, a market supplement or market pay scale may be discretionally applied.
- 28. Market supplements/market pay scales are only payable to a small number of jobs which are evaluated using the GLPC or HAY schemes.
- 29. Where skills shortages exist in specific areas, or where despite paying at the median market rate for the role the pay rate for the role is still not sufficient to recruit and retain the skills required, a rate higher than the market median may be paid. This could be an additional increment, a percentage market supplement, or a market pay scale and requires the authorisation of the Director HR&OD in conjunction with the Head of Paid Service.
- 30. The level of market supplement applied to GLPC posts is determined by analysing market data from independent external sources.
- 31. The data used for assessing market pay scales for HAY graded posts is the HAY pay databank for the public and not for profit sector. The HAY databank provides the market median, upper quartile and upper decile pay range for each HAY pay grade.

### Salary protection

32. As a result of service redesign, employees may be redeployed to a role which is one grade lower than their current role. In this case, the employee will be in receipt of salary protection for a period of 12 months. Incremental progression and any negotiated pay award will not be applicable during the period of salary



protection. Redeployment (and salary protection) is subject to the following criteria:

- transferable skills,
- knowledge of work / experience
- agreement to undertake relevant training, which may include formal qualification
- match behaviours framework and skills profile
- working hours
- location
- 33. In exceptional circumstances, where there is a national shortage of skills and experience in a particular role, employees may be redeployed to a role more than one grade lower than their current role. This would be authorised by the Director HR&OD. In this case, the employee will be in receipt of salary protection for a period of 12 months and incremental progression and any negotiated pay award will not be applicable during the period of salary protection.

### Increases and additions to remuneration

- 34. The council's policy is to apply the nationally negotiated NJC pay award for GLPC graded employees which takes effect from 1<sup>st</sup> April each year and which applies to the national pay spine.
- 35. For GLPC graded employees, increments are awarded automatically up to the maximum of the grade unless formal proceedings are taking place such as under the Improving Work Performance Policy. Increments are paid on the 1<sup>st</sup> April each year, or six months after the start date (if the starting date is between October and April). There is no provision for the payment of an increment at any other time, unless there are recruitment or retention difficulties..
- 36. The council's policy for HAY graded employees is to cap any pay award in line with the NJC pay award unless market pay data identifies a significant drift and difficulties are identified with recruitment and retention of staff at this level.
- 37. For HAY graded employees, incremental progression through the grade is based on satisfactory performance and conduct measured over a 12-month period. Increments are paid on 1<sup>st</sup> April each year subject to satisfactory performance, and a minimum of 6 months in post at that time. There is no provision for the payment of an increment at any other time unless there are recruitment or retention difficulties.
- 38. The council also employs a small number of specialist employees covered by either Teachers or Soulbury salary scales which are negotiated nationally.
- 39. For the Coroner, the JNC for Coroner agreement is used as the basis for any salary increase, subject to representation made in writing by the Chief Coroner to be considered by the Director HR&OD in conjunction with the Chief Executive. A



'complexity review' of the coronial area is completed every 5 years starting in the financial year 2024/2025 by the Director HR&OD in conjunction with the Chief Executive after consideration of any written representation by the Chief Coroner. Any adjustments to remuneration following the complexity review will be backdated to 1st April each year that the review is carried out.

### The use of performance-related pay

- 40. It is the council's policy that HAY graded employees are subject to a performance appraisal each year. If the performance and conduct are measured as satisfactory, an increment may be awarded. If the performance and conduct do not meet the required standard an increment may be withheld.
- 41. For GLPC graded employees, increments are awarded automatically to the maximum of the grade unless formal proceedings are taking place such as under the Improving Work Performance Policy.

### The use of bonuses

42. The council does not routinely offer a bonus or honorarium scheme to any employee. However, in exceptional circumstances, an additional payment may be considered for recruitment and/or retention purposes as required for service reasons. Any payment requires the authorisation of the Director HR&OD in conjunction with the Chief Executive as Head of Paid Service.

### The Apprenticeship Levy

- 43. The apprenticeship levy has been in place since April 2017 and the council has been paying a levy of 0.5% of the pay bill monthly into a digital apprenticeship account which is used to fund the cost of training for apprenticeships. As well as focusing on recruiting new apprentices, the council has also used the levy to fund upskilling current employees helping to 'Grow Our Own' and fill hard to recruit roles.
- 44. Since the introduction of the levy, the council has recruited 102 new apprentices with 59% still working within the council on completion. The council currently has 34 new apprentices undertaking a programme ranging from qualification level 2 up to level 6 and 144 employees who are undertaking an apprenticeship through upskilling, ranging from qualification level 2 up to level 7. Total apprenticeships since the introduction of the levy equates to 660 starts.

# The approach to the payment of employees on their ceasing to be employed by the authority on grounds of redundancy

- 45. Employees who leave the council's employment are entitled to payment of their contractual notice, along with any outstanding holiday pay.
- 46. All employees, including chief and senior officers, are subject to the same redundancy payments policy which has been agreed by Staffing Policy Committee.



- 47. There is no discretion to make redundancy payments which do not comply with the policy.
- 48. If employees choose to volunteer and are accepted for redundancy, they are entitled to a payment calculated as follows:
  - Statutory weeks x normal weekly pay x 2.5, capped at 40 weeks, with a minimum payment of £3000 (pro rata for part time staff).
- 49. If employees choose not to volunteer for redundancy, and cannot be redeployed, they will leave on compulsory grounds. The payment is calculated as follows:
  - Statutory weeks x weekly salary (capped at £700), with a cap of 30 weeks pay or 20 years service. There is a minimum payment of £1500 (pro rata for part time staff).
- 50. If employees are aged 55 or over and have been a member of the pension scheme for at least 2 years, they are able to receive their pension and lump sum early if their employment is terminated on grounds of redundancy.
- 51. No augmentation to pension will apply for any employee.
- 52. If employees are dismissed on redundancy grounds, and receive a voluntary (enhanced) redundancy payment, they may be considered for re-employment to posts within Wiltshire Council after the minimum statutory period of four weeks has elapsed subject to meeting all of the following conditions:
  - The post did not exist or was not foreseeable at the time of the dismissal.
  - The vacancy has been advertised in accordance with Wiltshire Council policy and procedures.
  - The appointment was made on the basis of the best person for the job with regard to the usual selection procedures.
  - The appointment has corporate director approval.
- 53. These conditions apply for twelve months from the date of the dismissal, after which the employee may be considered for re-employment to any post within Wiltshire Council.
- 54. Under the Council's Constitution, the dismissal of Chief Executive, Corporate Director and Director is delegated to the Senior Officers' Employment Sub-Committee. The Sub-Committee may, however, refer the matter to full Council for final determination in exceptional circumstances.
- 55. In exceptional circumstances, severances payments under Section 203 of the Employment Rights Act 1996 and in line with the statutory guidance on the making and disclosure of Special Severance Payments by Local Authorities may be agreed. The relevant Director must discuss their proposal with the Director HR&OD to ensure compliance.



- 56. The decision for severance packages below £20,000 will be taken by the relevant Corporate Director in consultation with the Director HR&OD.
- 57. The decision for severance packages above £20,000 but below £100,000 will be taken by the Chief Executive with the Chief Finance Officer, Director HR&OD and the Leader of the Council.
- 58. The decision for severance packages in excess of £100,000 will be taken to Full Council for approval.

### The pension scheme

- 59. All employees are entitled to join the Local Government Pension Scheme (LGPS).
- 60. Since 2014, the LGPS benefits structure has moved from a Final Salary basis to a Career Average Revaluation Earnings (CARE) approach for benefits accruing after this date. Employee contribution bandings vary between 5.5 12.5% according to the employee's salary, with the employer contributions varying on a triennial basis.
- 61. The benefits of the scheme for all members include:
  - A tiered ill health retirement package if employees have to leave work at any age due to permanent ill health. This could give employees benefits, paid straight away, and which could be increased if they are unlikely to be capable of gainful employment within 3 years of leaving.
  - Early payment of benefits if employees are made redundant or retired on business efficiency grounds at age 55 or over.
  - The right to voluntarily retire from age 55 (on an actuarially reduced pension)
  - Flexible retirement from age 55 if employees reduce their hours or move to a less senior position. Provided the employer agrees, employees can draw all of their benefits helping them ease into their retirement.
- 62. Further information about the pension scheme can be found on the <u>pensions</u> <u>website</u>.

### Any other allowances arising from employment

### Payment for acting up or additional duties

- 63. This policy applies only to employees who, on a temporary basis:
  - act up carrying out the full responsibilities and duties of a higher graded post either for some or all of their working hours; or
  - carry out some, but not all, duties or responsibilities of a higher graded post for some or all of their working hours; or
  - take on additional duties within their role.



64. The policy allows for employees to receive the salary difference between the lower and higher graded job, calculated on a percentage basis if the additional duties are taken on for only part of the working week.

### Unsocial hours allowances

- 65. The council provides an additional allowance, expressed as a percentage of the basic rate, for regularly working late evenings / early mornings / nights / Sundays. These payments are graduated according to the degree of unsocial hours working and range from 10% to 33% in addition to normal hourly rate.
- 66. Unsocial hours allowances are only payable for GLPC graded jobs and are not available for senior managers.

### Overtime allowances

67. The council has an overtime policy where all employees are entitled to receive additional payment for hours worked in excess of 37 hours. Overtime must be agreed in advance with the line manager and be based on business critical need. GLPC graded employees can claim overtime hours at their normal hourly rate, however the preference is for time to be taken in lieu. HAY graded staff are only able to claim overtime in exceptional circumstances where there is an emergency situation and payment is based on the current highest spinal point of the NJC pay scale.

### Standby and callout allowances

68. The council has a standby and callout policy where all employees receive an allowance should they be on standby out of normal office hours. If employees are called out whilst on standby, additional hours worked will be paid at their normal hourly rate.

### Sleeping in allowance

69. The council pays a sleep-in allowance to employees required to sleep in on the premises. This includes up to 30 minutes call out per night, after which the additional hours provisions will apply. The sleep-in allowance payable currently £41.78, and increases in line with the NJC pay award.

### **Local election duties – Returning Officer**

70. The role of Returning Officer is carried out by the Chief Executive. Fees are paid in line with the relevant legislation and guidance.

### **Governance arrangements**

71. The council's policy is to apply the nationally negotiated NJC pay award to the pay scales for jobs evaluated using the GLPC job evaluation scheme.



- 72. There are no national pay scales for senior roles so pay is a matter for local determination. Pay scales for HAY grades are determined using the HAY pay databank for the public and not for profit sector.
- 73. The council also relies on national negotiation for some key provisions of employment such as the sickness and maternity schemes.
- 74. The council negotiates locally on some other conditions of employment, such as pay and grading, travel expenses, overtime payments and unsocial hours allowances.
- 75. For these local conditions of employment, the council consults and negotiates with the relevant trade unions, in order to reach agreement. These conditions and allowances are then referred to Staffing Policy Committee for agreement.
- 76. The role of Staffing Policy Committee is to determine, monitor and review staffing policies and practices to secure the best use and development of the council's staff. This includes the power to deal with all matters relating to staff terms and conditions.
- 77. The full remit of the council's Staffing Policy Committee is contained within the constitution.

# The publication of and access to information relating to remuneration of chief officers

- 78. In accordance with the Local Government Transparency Code 2015, the council is committed to publishing the following information relating to senior employees via the council's website:
  - Senior employee salaries which are £50,000 and above. This is updated on a monthly basis
  - A list of their responsibilities
  - An organisational chart of the staff structure for the top three tiers of the local authority, to include each individual's job title, contact details, grade, salary in a £5,000 bracket, grade maximum and whether each individual is a permanent or temporary employee. This is updated on an annual basis or more frequently if a significant restructure takes place

# The publication of and access to information relating to trade union facility time

- 79. In accordance with the Local Government Transparency Code 2015, the council is committed to publishing the following information relating to trade union facility time as a percentage of the Council's total wage bill via the council's website:
  - Basic estimate of spending on unions (calculated as the number of full-time equivalent days spent on union duties by authority staff who spent the majority of their time on union duties, multiplied by the average salary)



 Basic estimate of spending on unions as a percentage of the total pay bill (calculated as the number of full-time equivalent days spent on union duties by authority staff who spent the majority of their time on union duties, multiplied by the average salary divided by the total pay bill).

# The relationship between the basic pay remuneration of chief officers and employees who are not chief officers.

- 80. In terms of overall remuneration, the council's policy is to set different levels of basic pay to reflect the different sizes of jobs, but not to differentiate on other allowances, benefits and payments it makes.
- 81. The table below shows the relationship between the basic pay of the highest and lowest paid employees in the council, excluding employer and employee pension contributions and non-allowances. The figures include all staff in the council (non-schools) and are based on annual full time equivalent salaries.

	Annual FTE Salary November 2023	Ratio November 2023	Annual FTE Salary November 2024	Ratio November 2024
Highest Paid	£196,598		£188,772	
Lowest paid	£22,366	8.8	£23,656	8
Mean Salary	£33,540	5.9	£30,003	5.4
Median Salary	£31,364	6.3	£32,654	<u>5.8</u>

- 82. The council would not expect the basic pay remuneration of its highest paid employee to exceed 20 times that of the lowest group of employees, excluding apprentices.
- 83. Apprentice rates of pay vary according to the age and level of apprentice and range from £16,592 to £22,072 per annum. The apprentice rate of pay reflects the requirement for all apprentices to spend 20% of their working week undertaking learning away from the job. Because apprenticeship rates of pay are "spot" salaries and not determined through our job evaluation scheme we include the rates in this statement but not within pay ratio calculations.
- 84. The current ratio of highest to lowest paid employees is well within the guidelines and is 8:1. The ratios for the mean and median salary levels are at 5.4:1 and 5.8:1. The ratio for highest to lowest paid has decreased slightly on last year due to the appointment of the new Chief Executive and the consistent application of the April 2024 pay award of £1,290 on all NJC points regardless of salary resulting in the lowest point receiving a 5.7% increase compared with senior HAY grades receiving an increase of 2.5%.



### **Definitions**

**NJC** – National Joint Council

JNC – Joint Negotiating Committee

**GLPC** – Greater London Provincial Council

**SOULBURY** staff - Educational improvement professionals. These staff are drawn from different sources, including senior members of the teaching profession. Their role is to advise local authorities and educational institutions on a wide range of professional, organisational, management, curriculum and related children's services issues, with the overall aim of enhancing the quality of education and related services.

### **Equal Opportunities**

85. This policy has been Equality Impact Assessed to identify opportunities to promote equality and mitigate any negative or adverse impacts on particular groups.

### Legislation

- 86. This policy has been reviewed by the legal team to ensure compliance with the legislation below and our statutory duties.
  - Local Government Transparency Code 2015
  - Equality Act 2010

### **Further information**

- 87. There are a number of related policies and procedures that you should be aware of including:
  - HAY job evaluation policy and procedure
  - GLPC job evaluation policy and procedure
  - Market supplements policy and procedure
  - Moving home policy and procedure
  - Redundancy payments policy
  - Overtime policy
  - Unsocial hours guidance
  - Standby and callout policy
  - Starting salaries and incremental progression policy and procedure
  - Acting up and additional duties policy and procedure
  - The Local Government Transparency Code 2015
  - Trade Union Recognition Agreement

These policies are available from the HR department at Wiltshire Council on request.

Policy author	HR Strategic Delivery Team
Policy implemented	28 February 2012



Policy last updated December 2024



### Wiltshire Council

**Full Council** 

### **25 February 2024**

### Gypsies and Travellers Development Plan Document -Submission of Draft Plan

### **Executive Summary**

Approval is sought for submission of the Gypsies and Travellers Development Plan Document (the Plan) to the Secretary of State, for independent examination. This follows on from statutory (Regulation 19) consultation, which took place following Council approval in July 2024. The consultation closed on 4 October 2024 and approximately 650 comments were received, the majority of which were from the local community and their representatives.

The Plan addresses the accommodation needs of Wiltshire's travelling communities to 2038. It will, alongside the Wiltshire Local Plan review, which was approved by Full Council for submission to the Secretary of State on 15 October 2024, complete the update of the adopted local plan, the Wiltshire Core Strategy that is now nine years old. Together they will ensure that the accommodation needs of all parts of Wiltshire's communities can be addressed, and the council meets its equalities duty.

Since the close of the consultation, all comments have been thoroughly reviewed and considered to ensure that the Plan is ready for submission. A consultation statement has been prepared (known as the Regulation 22 Statement), which summarises the main issues raised through the consultation and the council's initial response to these. Through reviewing the comments there are some suggested changes to help inform the examination process. These include ensuring appropriate mitigation on allocated sites. The Inspector has the ability through the independent examination to recommend where changes are needed to address soundness and legal compliance issues.

Having considered all the comments received it is considered that the council has complied with the relevant requirements and the Plan is ready for submission for independent examination. Cabinet endorsed the plan at their meeting on 4 February 2025 and resolved to request that the Inspector appointed to examine the Plan takes into consideration any additional supply of pitches approved since the consultation took place. Subject to Full Council approval in February, the Plan will be submitted before 12 March 2025. This is both in line with the timescales in the council's Local Development Scheme and the transitional arrangements set out in the revised National Planning Policy Framework (published December 2024).

The Plan sets out a clear strategy for addressing the housing needs of traveller communities in line with national policy. This is the first local plan for Wiltshire to directly address needs through the provision of allocations and emergency stopping sites, enabling the council to better manage unauthorised and speculative developments.

### **Proposals**

That Full Council, having considered the response from the formal consultation:

- a) Approves the submission of the Gypsies and Travellers Development Plan Document Pre-Submission Draft at **Appendix 1** to the Secretary of State for Housing, Communities and Local Government together with relevant associated documentation;
- b) Directs that submission is accompanied by a request that the Inspector appointed to carry out the examination recommends any modifications necessary to make the Plan sound and legally compliant in accordance with Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended); and
- c) Authorises the Director of Planning to take or authorise such steps as may be necessary for the independent examination of the Plan to be completed, including:
  - i. Make appropriate arrangements for submission of the Plan and the completion and submission of all documents relating to the Plan;
  - ii. Make all necessary arrangements for examination including the appointment of a Programme Officer; the undertaking and/or commissioning of other work necessary to prepare for and participate at examination; proposing main and/or minor modifications to the Plan and/or modifications to the Policies Map; entering into Memorandums of Understanding and Statements of Common Ground; and the delegation to officers and other commissioned experts to prepare and submit evidence, representations and submissions to the examination and, where necessary, appear at any hearing sessions and represent the council; and
  - iii. Implement any consequential actions relating to the examination, including undertaking any consultation that may be necessary, and publishing the recommendations and reasons of the person appointed to carry out the examination.
- d) Approves that as part of submitting the Plan for examination it is accompanied by the following request:

The council recognises that the plan will be examined in the context of site evidence and delivery. As the examination of the plan will take time and new sites have already begun to be approved on a speculative basis through the submission of planning applications, these will have implications for the number of pitches proposed for allocation. As such, the council resolves to ask the Inspector to take into account the additional supply of pitches that have been approved since the regulation 19 consultation and consider reducing the allocations when assessing the proposed allocations within the Plan.

### **Reasons for Proposals**

To ensure that progress continues to be made on updating Wiltshire's local plan in line with the commitment set out in the council's Local Development Scheme and statutory requirements, and an efficient examination process. This Plan together with the wider Wiltshire Local Plan review will complete the update of the Wiltshire Core Strategy ensuring the housing needs of all sectors of the community are addressed.

Parvis Khansari Corporate Director - Place

### **Full Council**

### **25 February 2024**

### Gypsies and Travellers Development Plan Document -Submission of Draft Plan

### **Purpose of Report**

### 1. To:

- (i) Inform Full Council of the response to the Regulation 19 consultation on the Gypsies and Travellers Development Plan Document Pre-submission Draft (August 2024) ('the Plan');
- (ii) Seek for Full Council to approve the submission of the Plan for independent examination; and
- (iii) Seek delegated authority to make appropriate arrangements for the submission of the Plan and associated documents to the Secretary of State and for the independent examination of the Plan

### Relevance to the Council's Business Plan

2. The Council's 'Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025' recognises the importance of a settled base to support the health and well-being and educational needs of these communities. Providing for the housing needs of, and improving health outcomes for, Wiltshire's gypsy and traveller communities aligns with the 2022-2032 Business Plan Mission Resilient Society. The importance of updating the Local Plan to provide an effective policy framework for the sustainable growth of Wiltshire is also explicitly referred to.

### **Background**

- 3. Council on 24 July 2024 approved the publication of the draft Plan for its final stage of consultation prior to its submission for independent examination. The full background to the Plan is summarised in that report and can be viewed <a href="https://example.com/here">here</a>. At that stage, Regulation 19, representations were invited on soundness and legal compliance.
- 4. The Regulation 19 consultation commenced on 20 August 2024 and ended on 4 October 2024. In total approximately 650 comments were received from a variety of different individuals and organisations. They included petitions and representations on behalf of residents who came together to submit their responses.

- 5. At the Regulation 19 stage the council published what it considered to be a sound Plan that met all the necessary legal requirements. To be sound, as set out in the published National Planning Policy Framework ('NPPF') (paragraph 35) at the time of the consultation, a Plan must be:
  - (i) **Positively prepared** providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmetneed is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - (ii) **Justified** an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - (iii) **Effective** deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - (iv) **Consistent** with national policy enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national policy, where relevant.
- 6. Section 20(2) of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act') requires that the local planning authority only submittheir plan when they consider it to be ready for examination (and they have complied with any relevant requirements contained in regulations under the 2004 Act). Consideration of the Regulation 19 responses and the issues they raise informs the decision to submitthe Plan. Before submission there is an expectation that local planning authorities do all they can to resolve any substantive concerns about soundness or legal compliance of the Plan, with particular attention to the duty to cooperate. See Legal Implications below.
- 7. The examination process allows for the Inspector to determine whether modifications should be made to the Plan to address any soundness or legal compliance issues. Under Section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant.
- 8. The appointed Inspector will consider all the representations received through the Regulation 19 consultation, together with the evidence relied upon by the council in preparing the draft Plan. The examination will focus on those matters that the Inspector considers need to be tested thoroughly through open hearing sessions before making a recommendation. There are three possible outcomes that Planning Inspectors can recommend following the examination of a Plan. They can recommend that the Plan is:
  - Withdrawn (i.e. it would fail the tests of soundness and/or legal compliance and is incapable of addressing such matters and/or the duty to cooperate has not been complied with); or
  - Adopted without main modifications; or
  - Adopted subject to applying a schedule of main modifications.

Where main modifications are recommended, consultation is required on these as part of the examination process before the Inspector concludes the examination

### Main Considerations for the Council

- 6. Having considered all representations, officers have prepared a consultation statement under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Regulations'), known as the Regulation 22 Statement, which is provided at **Appendix 2**. This sets out how the council has undertaken its duties in preparing the draft Plan. The statement summarises the stages of consultation that have taken place, explaining how the public and other stakeholders were invited to participate and make representations, outlining the main issues raised from the Regulation 18 stages of consultation and how the representations at those stages were considered in preparing the Local Plan, whilst also presenting the main issues arising from the Regulation 19 consultation.
- 7. The statement demonstrates that consultation on the preparation of the draft Plan has been undertaken in accordance with the relevant legislation and council's Statement of Community Involvement (including the temporary arrangements that applied during the COVID-19 pandemic). The statement is required to set out the main issues arising from the consultations and may also, where appropriate, set out the council's initial response to them. The council is not required to provide detailed responses to each representation, but consultees can be reassured that their complete responses will also form part of the submission documents and have been considered in preparing the Regulation 22 Statement. All representations can be viewed via this <a href="Link">Link</a>.
- 8. So far as the Regulation 19 stage is concerned, Section 3 of the Regulation 22 Statement provides an overview of the main issues in plan order, and Schedule 2 of Appendix 2 of the Regulation 22 Statement sets these out in more detail together with information on who has commented on these matters.
- 9. The main issues arising from the Regulation 19 consultation are predominantly, but not limited to, factors relating to individual site allocations and in particular new sites. The challenges to the Plan largely relate to choice of sites and a range of arguments based on policy and technical concerns over the impacts that new development may bring to existing communities.
- 10. Responses were predominantly received from members of the local community including parish and town councils, as well as prescribed bodies (Environment Agency, Natural England, National Highways), neighbouring local planning authorities, the Ministry of Defence, and planning agents (on behalf of local businesses or individuals). The responses also included representations and petitions on behalf of resident groups objecting to certain site allocations, including in Rowde, Potterne, Thickthorn, and Upper Seagry.
- 11. Responses from prescribed bodies did not raise any major issues. Natural England identified that an Appropriate Assessment (required to comply with the Habitats Regulations) had been carried out and that the Plan would not result in adverse effects on the integrity of designated environmental sites. Environment Agency identified that a proportion of some sites lay within Flood Zones 2 and 3, and indicated a sequential approach should be taken with any planning applications to ensuring built development on the site lay outside these flood zones.
- 12. Responses from neighbouring authorities broadly indicated that the Plan was welcomed, with enthusiasm for continuing dialogue to ensure needs would be met in full. Individual responses of note sought to clarify the geographic scope of the Plan to

exclude the New Forest National Park, and that the Plan had required appropriate mitigation for recreational pressures in the vicinity of the New Forest protected sites. Also, one neighbouring authority indicated that there may be merit in monitoring how and where needs for travellers who did not fall within the definition of travellers (as set out in national planning policy) are being met. This monitoring will inform future policy as to the location of future site allocations.

- 13. Despite communication being undertaken to engage the gypsy and traveller community, a limited response was received. These were limited to landowners of new sites, and landowners of existing sites which are proposed for intensification or safeguarding.
- 14. Some representations that were made related to council-owned land that is currently leased to tenantfarmers, and whether the access to the proposed sites where they are shared might interfere with existing farming operations. Further work has been undertaken, engaging with internal specialists, to consider the potential to have separate accesses. This has led to the need for some changes to be proposed to support the examination (see paragraph 20 below).
- 15. Frequentissues which were raised in responses included, but were not limited to:
  - accessibility to health facilities, shops, schools and other community services;
  - highway safety and capacity, quality of access to/from the public highway, and provision of pedestrian access to the site;
  - impacts on landscape, including effects of artificial lightarising from sites, and ecology;
  - flood risk, including surface drainage and connections and capacity to local sewers:
  - loss of higher-grade agricultural land to development.
- 16. These site-specific matters have been assessed through the plan making process. The site selection process was underpinned by technical evidence and specialist input and is supported by the Sustainability Appraisal. The draft policies relating to each allocation are generally considered to provide an appropriate level of prescribed mitigation measures, when read alongside the Plan as a whole, to help informany future planning application. However, following consideration of the representations consideration has been given to the effectiveness of policies and the need for clarifications or additional policy to ensure appropriate mitigation can be achieved. Policy GT30, which relates to a new site allocation on Whistley Road at Potterne is proposed for deletion as it is no longer available for development.
- 17. The matter of whether brownfield sites had been considered for potential development is raised in some representations. The Plan in considering existing sites and the potential to meet needs on sites by increasing capacity seeks to minimise the need for new greenfield sites. The methodology and site selection criteria were applied to all available sites which included brownfield land such as depots and salt stores owned by the council. Some currently or previously developed sites were subsequently found to be not available for development. While brownfield land or land of poor agricultural quality would be preferred, these sites did not advance to the site allocation stage for planning reasons.

- 18. There were a limited number of responses on matters not related to planning such as effect on property values, vicinity of police services, and civil matters such as a perception of hostility from site residents, or personal safety of the local community.
- 19. The legal duty to cooperate on strategic priorities and matters has been addressed through the plan making process. Regular, meaningful and continuing dialogue with prescribed bodies and neighbouring authorities appropriate to the Plan has taken place. This is set out in the Duty to Cooperate Statement provided at **Appendix 3**, which has been updated following the Regulation 19 consultation. Comments received at the Regulation 19 stage from prescribed bodies and neighbouring authorities are set out in the Regulation 22 statement. As set out in paragraphs 11 and 12, the comments made do not raise any significant issues, notwith standing this the council will continue to engage with these bodies in a constructive manner as the Plan progresses through the next stages. Statements of common ground are being developed as necessary to support the Duty to Cooperate Statement.

### Suggested changes to the Plan

- 20. While it is the role of the Inspector to ultimately recommend Main Modifications to a plan that are of a substantive nature, the council can identify changes that it considers the examination process will likely need to address. Officers have prepared an initial schedule of changes (**Appendix 4**) to assist the examination. It is not unusual for such schedules to be added to, at the request of the Inspector, as the examination progresses following the discussion of main matters with participants through the examination process.
- 21. As well as policy changes, as referred to in paragraphs 14 and 16 above, the schedule also includes more minor changes relating to, for example typographical errors and points of clarification. The tables containing five-year supply calculations have also been updated to take into account more recent planning permissions. The council has the ability to make minor changes without the need for them to be recommended by the Inspector. Suggested changes that would comprise main modifications can be considered through the examination process alongside other matters that the Inspector considers needs to be addressed.

### Changes to national planning policy

22. A revised NPPF was published in December 2024 and includes transitional arrangements for plans that are being prepared. Any plan that has been submitted for examination on or before 12 March 2025 will be examined under the relevant previous version of the NPPF. Approval by Cabinet and subsequently Council in February will mean this timescale can be met.

### Safeguarding Implications

23. Although there are no direct safeguarding implications arising from the proposals, the Plan is a key document in ensuring that the accommodation needs of the traveller community are being met and new sites are in locations, which as a minimum have access to education and health services. Emergency stopping sites are a safe alternative to roadside encampments. These measures contribute to a more inclusive and equitable approach to meeting the needs of the traveller community while promoting safety and access to necessary facilities.

### **Public Health Implications**

24. As recognised in the Health Needs Assessment for Gypsy, Traveller and Boater Populations Living in Wiltshire (July 2019) study, ethnic gypsies and travellers have significantly worse health outcomes than the general population and experience substantial health inequalities. Living conditions are one of the most significant contributory factors to poor health. Providing a settled base in locations where there is access to health and education services and connections to main service infrastructure has public health benefits

### **Procurement Implications**

- 25. The examination of the draft Plan will entail the need to procure the services of a suitably experienced Programme Officer to help support the appointed Inspector. The role of the Programme Officer is to act as a conduit for information sharing between the council, Third Party representors and the Inspector. The appointment of a Programme Officer is mandatory. The financial implications include provision for this appointment.
- 26. The development of the Plan to date has been supported by evidence procured from suppliers, including habitats regulations and gypsy and traveller accommodation assessments, who may be needed to support the council through the examination process. Any further procurement will be undertaken through engagement with the Procurement Team and in line with relevant council policy and national procurement legislation.

### **Equalities Impact of the Proposal**

- 27. The council is subject to a public sector equality duty under the Equality Act 2010, pursuant to which it must, in the exercise of its functions, have due regard to the need to: (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act; (b) advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 28. The consultation, as all previous consultations, was undertaken in accordance with the council's adopted Statement of Community Involvement, which takes an inclusive approach to consultation ensuring that everyone can be involved. One of the specific ways this was achieved for this consultation was including a leaflet drop to traveller households, which were designed and undertaken with the support of a third-party which is familiar with engagement with the traveller community.
- 29. Positively planning for the needs of Wiltshire's travelling communities will have a positive impact. A lack of suitable accommodation, as referred to above, can underpin many of the inequalities that they experience.
- 30. An Equalities Impact Assessment (EqIA) has been carried out alongside the preparation of the Plan which considered the potential for policies and proposals to negatively impact on equality in wider society. An updated EqIA is included at **Appendix 5** and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

### **Environmental and Climate Change Considerations**

- 31. The council's Local Plan must contain policies designed to secure that the development and use of land in the area contribute to the mitigation of, and adaptation to, climate change in line with Section 19(1A) of the 2004 Act. This Plan is limited in scope but has been prepared in compliance with the duty.
- 32. Sustainability Appraisal (incorporating the provisions of Strategic Environmental Assessment) and Habitats Regulations Assessment have been undertaken as part of the Plan's preparation. They help to ensure that negative environmental impacts are avoided, appropriate mitigation is identified, and polices and proposals deliver development in a sustainable manner while ensuring that accommodation needs can be addressed. These have been carried out for the Plan and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

### **Workforce Implications**

- 33. Preparation and implementation of the Plan has workforce implications for services across the council, as well as the Planning Service. A cross-authority delivery group has been supporting the development of the plan including officers from legal, development management, property, housing services and communications, as well as strategic planning. A dedicated project manager is in place. Specialist input from other services in relation to site assessments has been integral to development of the Plan e.g. highways, drainage, landscape, and ecology.
- 34. Input will continue to be required from services as the Plan progresses to examination and resources aligned to ensure there is sufficient capacity. It is anticipated that this will be absorbed within the current capacity of services but will be kept under review.

### Risks that may arise if the proposed decision and related work is not taken

- 35. If the proposed decision is not taken the council would fail to meet the obligations it set itself through the Local Development Scheme. It would be failing to meet statutory requirements to have an up-to-date local plan in place. The Plan is being progressed alongside the Wiltshire Local Plan review to address the housing needs of gypsies and travellers and review Core Policy 47 of the Wiltshire Core Strategy, 'Meeting the needs of gypsies and travellers'.
- 36. The principal risk is that the accommodation needs of these communities will not be met, which has implications for safeguarding and their health and wellbeing. It is likely to also lead to more incidents of unauthorised encampments, speculative development proposals and associated conflict with the settled community.
- 37. It is important for the council to continue to make progress on preparing the Plan alongside the Wiltshire Local Plan review in line with the commitment set out in the Local Development Scheme (March 2024). This will ensure the housing needs of all sectors of the community are addressed in the development plan for Wiltshire.

# Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

38. It is considered that the draft Plan is a sound and legally compliant plan (subject to potential main modifications as discussed above). However, there is still the need to

manage any risk that the submitted draft Plan could be found to be unsound or not legally compliant through the examination process and hence recommended for withdrawal by the Inspector. The council can manage this risk by:

- Ensuring that it provides all the documents prescribed by statute (see Legal Implications);
- Submitting further information to inform and assist the examination process in response to representations made to the draft Plan;
- Requesting that the Inspector recommend any modifications necessary to make the submitted draft Plan sound and legally compliant. This can be achieved through a direct request to the appointed Inspector in accordance with the provisions set out in Section 20(7C) of the 2004 Act; and
- Ensuring any detailed matters that need to be subject to refinement are finalised prior to adoption as part of an iterative process. One such example is ensuring that the Mitigation Strategies for protected sites, which support the Habitat Regulations Assessment, continue to be progressed and agreed with Natural England.
- 39. There remains a reputational risk to the council if it proceeds with the draft Plan. This would likely arise from local people who do not want to see development occurring close to where they live, or areas they value. Whilst this risk is real, the council is nonetheless charged with making difficult, often controversial decisions in the interests of ensuring it maintains an up-to-date development plan and a planned approach to development to ensure all of Wiltshire's communities' needs are met.

### **Financial Implications**

- 40. The financial implications of taking forward the Plan through the examination stage and onto adoption has been planned for in the Council's Medium Term Financial Strategy (MTFS). They will be met from the Strategic Planning service budget of £0.23m and the Local Plan earmarked reserve, which has a balance of £0.579m as of 31 March 2024.
- 41. As previously reported and recognised by Cabinet, council-owned land and financial investment is needed to support the delivery and management of transit accommodation (i.e. Emergency Stopping Places). Provision has been made for this in the council's Capital Programme. However, the Emergency Stopping Places Strategy will need to be updated to support the identification and delivery of two further sites, in addition to the one that is set out in the Plan. Any further financial implications will be considered at that time. To ensure sufficient permanent sites can be allocated in the Plan, five sites comprising a total of 22 pitches are also included.

### **Legal Implications**

- 42. The main legislation governing plan-making is found in the 2004 Act and the 2012 Regulations. In accordance with Sections 19 and 20 of the 2004 Act, the council has a statutory duty to prepare planning policies and maintain an up-to-date development plan (this is further reinforced through the NPPF and Planning Practice Guidance). The draft Plan has therefore been prepared in compliance with primary legislation.
- 43. In preparing the Plan, it is considered that the council has complied with the statutory duty to co-operate and engaged with prescribed bodies, local communities and other stakeholders throughout the plan making process in accordance with its Statement of

Community Involvement. A report highlighting how the council had fulfilled the duty to cooperate up to the publication of the draft Plan was made available to support the consultation documents at the Regulation 19 stage of the plan making process and has been updated following the consultation. This is provided at **Appendix 3**.

- 44. The Plan has been supported by a process of sustainability appraisal, in accordance with section 19(5) of the 2004 Act and the Environmental Assessment of Plans and Programmes Regulations 2004, and habitats regulations assessment, in accordance with the Conservation of Habitats and Species Regulations 2017.
- 45. Reflecting on the entire process to date, it is considered that the council has discharged its functions in respect of Regulation 18 (Preparation of a local plan) and Regulation 19 (Publication of a local plan) of the 2012 Regulations. Representations relating to the draft Plan submitted at the Regulation 19 consultations stage have been duly recorded in accordance with Regulation 20.
- 46. The next stage of the process (if authorised by Cabinet and Council) is submission of the Plan to the Secretary of State for independent examination. By section 20(2) of the 2004 Act, the council can only submit the Plan for independent examination if: (a) they have complied with any relevant requirements contained in the 2012 regulations; and (b) they think the Plan is ready for independent examination.
- 47. It is considered that the council has complied with the relevant requirements in the Regulations and will continue to do so. Moreover, although there are certain outstanding issues to resolve, the council considers that all outstanding technical issues can be satisfactorily resolved to allow the Inspector to find the Plan sound at examination. As such, it is considered that there is no impediment to submitting the draft Plan and all supporting documents. According to Section 20(3) of the 2004 Act and Regulation 22 (1), the next stage of the process involves the Council submitting a prescribed list of documents to the Secretary of State, alongside the draft Plan. These documents are:
  - the sustainability appraisal report;
  - a submission policies map (i.e. changes to the adopted policies map);
  - a statement setting out how the draft Plan has been prepared1;
  - copies of the representations received through the Regulation 19 consultation; and
  - such supporting documents considered relevant to the preparation of the draft Plan.
- 48. The 'supporting documents' include those published as supporting documents to this report together with the appropriate Appendices.
- 49. Once submitted to the Secretary of State, the draft Plan will be examined by an independent Inspector whose role is to consider compliance with section 20(5) of the 2004 Act, in essence whether the Plan is legally compliant and sound and whether the council has complied with the duty to cooperate. Under section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant. As set out above, it is considered that the draft Plan is a sound and legally compliant plan (subject to potential main modifications as discussed above) and that the council has complied with the duty to cooperate.

50. If the Plan passes the examination and is adopted, it will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications and appeals.

### **Overview and Scrutiny Engagement**

51. Members of the Environment Select Committee (ESC) received informal confidential briefings during the development of the Plan, which allowed for discussion and challenge to the emerging policies in the Regulation 19 plan. With agreement of the Chair, a further briefing has taken place that has been opened up to all members in advance of Cabinet.

### **Options Considered**

- 52. Consideration has been given to the option of making changes to the Plan prior to submission which would then formpart of the submitted plan to be examined. This would require further consultation similar to what was done at the Regulation 19 stage on the proposed changes, together with updated sustainability appraisal and Habitats Regulation Assessment and would result in additional delay to the process.
- 53. Progression of the draft plan to the formal submission and examination stages will ensure that the council maintains the commitment it gave through the published Local Development Scheme (March 2024). To informand assist the examination process a schedule of proposed changes has been prepared (**Appendix 4**), as well as the preparation of Statements of Common Ground where necessary. The Regulation 22 Statement (**Appendix 2**) clarifies the council's initial response to the issues raised. Where appropriate, suggested changes are proposed. The Inspector would not treat these as part of the submitted plan but may consider it appropriate for them to be considered in full or part through the examination process when considering the need for main modifications to the Plan.

### Conclusions

- 54. This report seeks Full Council approval to submit the Gypsies and Travellers Development Plan Document to the Secretary of State for independent examination. This represents the final stage of the Plan process, having been through public consultation. Preparation of the plan has had to respond over time to changes in national policy regarding the planning definition of travellers and updated needs assessments. It aims to meet the needs of Wiltshire's travelling community over the plan period. The Plan strives to deliver the Plan objectives to support the evidenced levels of need while also preserving the county's most attractive natural and historic environment.
- 55. It is considered that the council has complied with the relevant requirements under the 2012 Regulations and will continue to do so, and that the Plan is ready for independent examination. Through carefully considering the Regulation 19 consultation comments and suggesting proposed changes, the council has taken positive steps to prepare for the examination process.
- 56. Whilst some of the comments received through the Regulation 19 consultation challenge the soundness of the draft Plan, the matters raised are considered capable of resolution through the examination process (whether through justification of the Plan as drafted or through main modifications). It will be within the Inspector's remit to work

pragmatically and positively with the council, and the delegated authority proposed in this report will ensure the council supports an efficient process.

57. The Plan has been in preparation since 2020. The assessment of gypsy and traveller needs in the current development plan (Wiltshire Core Strategy) are now time-expired, and the council have now progressed the Plan to respond to an up-to-date assessment of needs for the travelling community. Subject to Council approval, submission of the draft Plan together with the accompanying documents will be in line with the timescale within the approved Local Development Scheme (March 2024).

### Nic Thomas - Director of Planning, Economy, and Regeneration

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### **Appendices**

Appendix 1 - Gypsies and Travellers Development Plan Document - Pre-submission draft plan (August 2024)

Appendix 2 - Regulation 22(1)(c) Consultation Statement (February 2025)

Updated post Cabinet

Appendix 3 - Duty to Cooperate Statement (Updated January 2025)

Appendix 4 - Schedule of proposed changes (February 2025)

Updated post Cabinet

Appendix 5 - Equalities Impact Assessment

### **Background Papers**

None



# Wiltshire Gypsies and Travellers Development Plan Document

Pre-Submission Draft (Regulation 19) August 2024



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# 1 Introduction

#### What is the Plan?

- 1.1 The Gypsies and Travellers Development Plan Document (hereafter referred to as the Plan) sets out Wiltshire Council's strategic planning policies for meeting the accommodation needs of gypsies and travellers and travelling showpeople. It will replace 'Core Policy 47: Meeting the needs of gypsies and travellers' of the Wiltshire Core Strategy (adopted January 2015)<sup>1</sup>.
- 1.2 The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. Together both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire; except for the small part of Wiltshire that is in the New Forest National Park in the extreme south-east of the county, where the New Forest National Park Authority is the local planning authority. Figure 1 in Chapter 3 shows the plan area.
- 1.3 The Plan has been prepared in accordance with national planning policy including Planning Policy for Traveller Sites, updated December 2023<sup>2</sup> and the National Planning Policy Framework<sup>3</sup>. It is based on robust evidence in the form of a Gypsy and Traveller Accommodation Assessment (GTAA) to establish the accommodation needs of Wiltshire's travelling community across the plan period from 1 April 2024 to 31 March 2038<sup>4</sup>. This considers the need for transit provision and permanent accommodation within the plan area.
- 1.4 Consistent with national policy, the Plan focuses on addressing the accommodation needs of gypsies and travellers and travelling showpeople who meet the planning definitions<sup>5</sup> as follows:
  - Gypsies and travellers Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.
  - Travelling showpeople Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.
- 1.5 The Plan uses the term 'travellers' to collectively refer to 'gypsies and travellers' and 'travelling showpeople' as defined above. When referring to accommodation needs, the term 'pitch' is used for 'gypsies and travellers' and 'plots' for 'travelling showpeople'. Traveller households live on a pitch or plot.

<sup>1</sup> Wiltshire Core Strategy

<sup>2</sup> Planning Policy for Traveller Sites - GOV.UK (www.gov.uk)

<sup>3</sup> National Planning Policy Framework - GOV.UK (www.gov.uk)

Wiltshire Council Gypsy and Traveller Accommodation Assessment, June 2024, Opinion Research Services - <u>Gypsy and Travellers</u> - <u>planning - Wiltshire Council (2024 GTAA)</u>

<sup>5</sup> Annex 1, Planning policy for traveller sites

- 1.6 Policies in the Wiltshire Core Strategy, which will be replaced by those in the emerging Wiltshire Local Plan review<sup>6</sup>, complement the policies in this Plan where appropriate, but for the purpose of planning for travellers this Plan is the starting point for determining planning applications.
- 1.7 While this Plan is the starting point when determining planning applications for traveller sites, all other relevant policies within the development plan and national policy will be taken into account along with other material considerations. This will include, but not limited to policy on Green Belt, historic environment, National Landscapes (formerly Areas of Outstanding Natural Beauty), and biodiversity; as well as neighbourhood plans where they contain relevant policies.
- 1.8 The GTAA advises that the needs for those households who did not meet the planning definition for travellers should be addressed as part of general housing need and separate policies would therefore apply<sup>7</sup>. However, travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010)<sup>8</sup> because of their protected characteristics. This means that consideration will need to be given to mobile homes as a form of housing when considering applications for such use and applying policies within the development plan.

#### How to use this Plan?

- 1.9 The objectives of the Plan are set out in Chapter 2, with policies setting out the Plan's strategy for meeting the objectives together with development management policies within Chapter 3. Chapter 4 allocates specific sites to help meet needs. Chapter 5 sets out how the plan will be monitored over the plan period to ensure its continued effectiveness.
- 1.10 The policies in the Plan require changes to be made to the existing policies maps that support Wiltshire's adopted local plan. Figures 2 to 27 include the changes to be made in relation to allocated sites. Safeguarded sites are shown in Figures 28 to 58 in Appendix 2 to this Plan.

# How has the Plan been prepared

- 1.11 There has been an open call for sites during the preparation of the Plan, and this has been supplemented by a targeted approach to landowners requesting them to put forward their land for consideration in 2023. Despite these efforts only limited sites have been put forward by landowners for consideration through the Plan.
- 1.12 The GTAA has been kept up to date during the Plan's preparation and through this process, engagement has been undertaken with both the traveller community and neighbouring authorities. Legislation and national planning policy requires local planning authorities and other prescribed bodies to cooperate on strategic crossboundary matters when preparing plans. A statement setting out how the Council has addressed the duty to cooperate forms part of the evidence base and will be updated until the Plan is submitted for examination.
- 1.13 Alongside the GTAA, evidence papers and technical assessments have been prepared to inform the plan, including sustainability appraisal and assessment under the Habitats Regulations. These assessments ensure that the Plan: promotes sustainable development and demonstrates that economic, social and environmental impacts (positive and negative) have been considered in its

<sup>6</sup> The Local Plan review - Wiltshire Council

<sup>7</sup> Paragraphs 1.15 and 3.37, 2024 GTAA

<sup>8</sup> Equality Act (2010)

preparation; and that the potential for adverse impacts on features of sites protected under the Conservation of Habitats and Species Regulations 2017<sup>9</sup> (as amended) and appropriate mitigation are also considered.

**1.14** The Plan has now reached the Regulation 19 consultation stage and consultation is being undertaken in accordance with the Council's Statement of Community Involvement<sup>10</sup>.

# **Next steps**

1.15 Following the close of the consultation, the Council will consider all representations received before submitting the Plan to the Secretary of State for examination, which is anticipated early 2025 following approval by Cabinet and Council December 2024<sup>11</sup>.

<sup>9</sup> Conservation of Habitats and Species Regulations 2017

<sup>10</sup> Statement of Community Involvement, Wiltshire Council, July 2020

<sup>11</sup> Wiltshire Local Development Scheme, Wiltshire Council, March 2024
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# 2 Objectives

- 2.1 National planning policy requires that Council's plan for the accommodation needs of all groups within the community, including travellers<sup>12</sup>. Their overarching aim is to ensure fair and equal treatment of travellers in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. In respect to plan-making, in summary authorities are required to:
  - Assess the permanent and temporary accommodation needs of travellers.
  - Identify land in the right locations to meet need through sustainable development.
  - Address unauthorised encampments.
  - Reduce tensions between traveller and settled communities in plan-making and decision taking<sup>13</sup>.
- 2.2 Most gypsies and travellers in Wiltshire are English or Romany Gypsies, and Irish Travellers. They are a diverse group of communities which share some features but have their own histories and traditions. A key common feature is nomadism. The Equality Act 2010 recognises ethnic travellers, and they are protected against discrimination.
- 2.3 Distinct from these groups are travelling showpeople. They run fairs, circuses and shows and their presence in Wiltshire goes back many years.
- 2.4 There are 85 sites with around 380 pitches and plots for gypsies and travellers and travelling showpeople in Wiltshire<sup>14</sup>. The majority are authorised private sites for gypsies and travellers. There are also 3 sites with 50 pitches for gypsies and travellers that are owned and managed by Wiltshire Council. The distribution of sites in Wiltshire generally follows an arc from Cricklade in the north of the county to Warminster in the west, with additional sites around Salisbury in the south<sup>15</sup>.
- 2.5 Some sites contain travellers who do not meet the planning definition because they have never travelled but have protected characteristics and a need for culturally appropriate accommodation such as mobile homes. There are also some travellers that live in bricks and mortar housing.
- 2.6 Many travellers pursue an active nomadic life and are mainly self-employed. However, these traditional patterns are changing, and this has increased the need for new sites that serve as a settled base.
- 2.7 In addition to travellers who have a settled base in the county, groups travel through Wiltshire, and this can result in temporary unauthorised encampment on private and public land. The number and location of encampments varies year by year.
- 2.8 The importance of a settled base to support the health and well-being and educational needs of these communities is recognised in the Council's 'Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025'. Providing for the accommodation needs of, and improving health outcomes for, Wiltshire's gypsy and traveller communities also aligns with the Council's 2022-2032 Business Plan.

<sup>12</sup> Paragraph 63, National Planning Policy Framework

<sup>13</sup> Paragraphs 3 and 4, Planning policy for traveller sites

<sup>14</sup> Figure 5, Page 29, 2024 GTAA

<sup>15</sup> Page 36, 2024 GTAA

2.9 The following 4 objectives have been developed for the Plan:

**Objective 1:** To meet identified accommodation needs for gypsy and traveller pitches and travelling showpeople plots to 2038 through site allocations, broad locations for growth and a policy framework for assessing proposals.

**Objective 2:** To make provision for 3 Council-managed emergency stopping places to provide temporary accommodation.

**Objective 3:** To deliver well-designed sites in keeping with their surroundings, and in appropriate and sustainable locations with access to services and facilities which respect both the interests of the settled and traveller community.

**Objective 4:** To set out the approach to meeting needs for culturally appropriate accommodation for gypsies and travellers that do not meet the planning definition.

# 3 Strategy For Meeting Traveller Needs

- 3.1 The Wiltshire Council Gypsy and Travellers Accommodation Assessment, June 2024 (GTAA)<sup>16</sup> provides a robust assessment of the accommodation need for Wiltshire's travelling community. It identifies permanent pitch need for gypsies and travellers, and permanent plot need for travelling showpeople over the period 2024/25 to 2038/39 in line with the 5 year bands in national policy. As the plan period extends to 2037/38, the headline figures in the GTAA have been adjusted to take off the final year.
- **3.2** The GTAA methodology can be summarised as follows:
  - i. Desk-based data review.
  - ii. Stakeholder engagement, including with neighbouring authorities.
  - iii. Survey of traveller communities, including households residing in bricks and mortar.
  - iv. Application of the planning definitions in national policy<sup>17</sup>.
  - v. Calculation of need and supply.
  - vi. Application of household formation rates over the plan period.
- 3.3 It identifies current pitch and plot need from the following sources:
  - i. Households on unauthorised sites for which planning permission is not expected.
  - ii. Concealed, doubled-up or over-crowded households (including single adults).
  - iii. Teenage children who may be in need of a pitch of their own in the next 5 years.
  - iv. In-migration/roadside.
  - v. Households in bricks and mortar needing to move to sites.
  - vi. Households in need on waiting lists for public sites.
- 3.4 The assessment also provides evidence on transit (also referred to as temporary) accommodation requirements over the plan period.
- 3.5 The GTAA identifies for the plan period 1 April 2024 to 31 March 2038 the need for 182 gypsies and traveller pitches for households that meet the planning definition comprising: 60 concealed or doubled-up households or single adults; 54 from teenagers who may need a pitch of their own in the next 5 years; 11 households on unauthorised developments; 4 from in migration/roadside; 6 households living in bricks and mortar; and 47 from future household formation 19.

<sup>16</sup> Gypsy and Travellers - planning - Wiltshire Council

<sup>17</sup> Annex 1, Planning Policy for Traveller Sites

Figure 2 (Page 7) 2024 GTAA. See paragraph 1.3 for explanation of time periods used in GTAA.

Paragraph 1.18, 2024 GTAA. Excludes 6 dwellings identified in Figure 2 for year 15 that relate to future household formation. Page 402

- 3.6 The GTAA goes on to recognise the likelihood that the need from teenagers in the short to medium term will not need a formal pitch set up. Instead, other approaches can be taken to meeting these needs including through siting additional touring caravans on existing pitches/sites or in larger extended family groups through sharing accommodation. This is also the case for single concealed or doubled up adults<sup>20</sup>.
- 3.7 For travelling showpeople a need for 12 plots has been identified over the plan period, comprising: 8 from concealed households, 3 from teenagers, and 1 from future household formation<sup>21</sup>.
- 3.8 The GTAA, in accordance with national policy, breaks down the overall permanent pitch and plot need into 5 year bands from 2024/25 to 2038/39, which form targets. As the plan period extends to 2037/38 the final year is excluded. The current need informs the first 5 year band 2024/25 2028/29, and future need arises thereafter from new household formation. This is set out in Tables 1 and 2 and excludes the need arising from teenage children due to potential for this to be met on existing pitches/sites<sup>22</sup>.

Table 1: Pitch need from gypsies and travellers meeting planning definition

Year Period	0-5 <sup>23</sup>	6-10	11-14	Plan Period
Dates	2024-29	2029-34	2034-38	2024-2038
Pitch need	81	25	22	128

Table 2: Plot need from travelling showpeople meeting the planning definition

Year Period	0-524	6-10	11-14	Plan Period
Dates	2024-29	2029-34	2034-38	2024-2038
Pitch need	8	0	1	9

- 3.9 The strategy to meet needs across the plan period is based on the requirement set out in national policy<sup>25</sup>, which requires the plan to:
  - Identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets; and
  - ii. Identify a supply of specific, deliverable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15.
- **3.10** Based on the GTAA findings, Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) therefore sets out the target number of pitches and plots to be provided and planned for across the plan period. It provides for permanent pitches for gypsies and travellers, and plots for travelling showpeople as defined in national policy.

<sup>20</sup> Paragraphs 1.11-1.13, 2024 GTAA

<sup>21</sup> Paragraph 1.26 and Figure 4 (Page 77), 2024 GTAA

<sup>22</sup> Figures 8 to 11, (Pages 47-50), 2024 GTAA

<sup>23</sup> Excludes need arising from teenage children

<sup>24</sup> Excludes need arising from teenage children

<sup>25</sup> Paragraph 10, Planning Policy for Traveller Sites

- 3.11 For the first 5 years of the Plan, to 1 April 2029, the plan seeks to identify sufficient specific deliverable sites through intensification of existing sites and new allocations. For years 6 to 10 and 11-14, need significantly reduces and is based on new household formation to meet local needs. The plan therefore safeguards existing sites to allow them to continue to meet the needs of travellers, which in effect form 'broad locations for growth', the need between years 6-10 is relatively modest and could be met from turnover or additional pitches on existing sites.
- Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) also makes 3.12 provision for the needs of teenage children (arising on sites) to be met through siting of additional caravans where this is in line with relevant design considerations and other development plan policies; helping maintain family cohesion. This approach may also provide suitable accommodation for single adults, reducing the need for pitches. As such, the siting of additional caravans will be monitored across the plan period.
- 3.13 In some circumstances touring caravans can be stationed on existing sites without the need for planning permission unless conditions have been imposed to manage the number of caravans stationed on a site. Even though planning permission may not be needed there are also regulations in place to ensure safe living conditions<sup>26</sup>. Where planning permission is required, applications for additional caravans on sites to meet a need will be assessed on a case-by-case basis against policies in the development plan including Policy GT3: New sites and intensification of existing sites. This is recognised in Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople).
- The GTAA also estimates a potential need of up to 37 pitches from undetermined gypsy and 3.14 traveller households (27 pitches current need and 11 future need) but the study could not confirm that they meet the planning definition<sup>27</sup>. Should a need be demonstrated during the plan period then the Plan allows for additional pitches on existing sites where they can accommodate them and provide acceptable living standards. In addition, the plan allows for windfall sites where they are to meet a demonstrable local need and there are no alternative sites.
- 3.15 Delivery of new pitches and plots will be monitored over the plan period, with the GTAA reviewed around every 5 years to ensure the level of provision remains appropriate for the community.
- 3.16 The GTAA also considers the temporary accommodation need of travellers based on stakeholder consultation, analysis of unauthorised encampments in Wiltshire and consideration of existing travelling routes within the county. There is currently no temporary accommodation available in Wiltshire and the GTAA recommends identifying emergency stopping sites in 3 broad locations around Trowbridge, Salisbury, and the north of the county<sup>28</sup>.
- Emergency stopping sites are basic sites with limited facilities to discourage long stay<sup>29</sup>. They can 3.17 be occupied by groups for a limited period, ordinarily no more than 28 days. To allow for the effective management of unauthorised encampments, it is recognised that the council will need to manage these in order that they can be opened as needed. Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) therefore makes provision for 3 sites to form a basic network of sites that can be used when required. Chapter 4 of the Plan allocates a first

Planning conditions, Mobile Homes Act 2013, Fire Safety measure – regulated reform (Fire Safety) Order 2005

Figures 17-18 (Page 63), 2024 GTAA

Paragraphs 1.28-1.30, 2024 GTAA

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emergency stopping site in the north of the county and the council is committed to identifying and delivering a further 2 sites in the south and west of the county in accordance with Policy GT5 (Emergency Stopping Sites).

**3.18** A Key Diagram, Figure 1, provides an overview of the strategy to meeting accommodation need.

© Crown Copyright and Database Rights 2024 Ordnance Survey Licence No 100049050 Malmesbury Swindon 00 Royal Wood Bassett Chippenham Bristol Calne Corsha Marlborough Bath Melksham and Bowerhill Village Bradford Newbur 0 0 Pewsey Devizes Trowbridge Ludgershal Market Westbury Lavington Tidworth Amesbur Warminster Andover O Mere Tisbury Salisbury Downton 12 16 Kilometers Southampton Legend Gypsy and Traveller Sites Wiltshire Boundary Settlements Urban centres outside of Allocation (Intensification) World Heritage Sites Wiltshire Principal Settlement New Forest National Park Allocation (New) Strategic rail routes National Landscapes Safeguarded Green Belt Key Transport Corridors Market Town Allocation (Emergency Broad Locations for Stopping Site) **Emergency Stopping** Local Service Centre

Figure 1: Key Diagram

#### Meeting the needs of gypsies and travellers, and travelling showpeople

Provision should be made for 128 permanent pitches for gypsies and travellers and 9 plots for travelling showpeople, where they meet the planning definition, during the period 2024 to 2038 through the following sources:

- i. Appropriate intensification of authorised permanent sites;
- ii. Site allocations:
- iii. Safeguarded sites; and
- iv. Windfall sites in accordance with Policy GT3 (New sites and intensification of existing sites).

Of this total provision, by 2029 provision should be made for 81 additional permanent pitches for gypsies and travellers that meet the planning definition; 8 plots for travelling showpeople that meet the planning definition; and 3 council emergency stopping sites in accordance with Policy GT5 (Emergency Stopping Sites).

Proposals for the intensification of safeguarded sites, identified in accordance with Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites), to provide additional pitches and plots or for the siting of additional caravans will be supported, where the development would meet a demonstrable on-site need and accord with other policies in the development plan.

- 3.19 Chapter 4 of the Plan sets out site allocations for both new sites and intensification of existing authorised sites through the provision of new pitches and plots. Table 3 summarises the supply from these sources against the first %year target in Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) (by 2029). The table also includes any planning permissions granted since the GTAA base date of 31 March 2024.
- 3.20 Table 3 shows that supply for both gypsy and traveller pitches and travelling showpeople plots is sufficient to meet the identified targets in the first 5 years of the plan period (2024 to 2029) consistent with national policy<sup>30</sup>.

Table 3: Supply of pitches and plots against 2029 targets

	Gypsy and Traveller Pitches	Travelling Showpeople Plots
2024-29 Need (a)	81	8
Planning permissions (b)	17*	-
Site intensification (c)	44	8
New site allocations (d)	34	-
Total Supply (e) = (b+c+d)	95	8
Surplus = (e) - (a)	14	0
Years of supply 2024-29	5.86	5.00

- \* Includes planning permissions 1 April to 31 July 2024
- 3.21 There is an inconsistency between the Planning Policy for Traveller Sites and the National Planning Policy Framework<sup>31</sup>, which requires a 5 year supply from adoption of the plan. This can only reasonably be considered from the closest monitoring period to the anticipated adoption of the Plan (1 April 2025). On this basis, the supply for both gypsy and traveller pitches and travelling showpeople plots is sufficient from adoption of the Plan as shown in Table 4 below. It is possible that supply increases further through the delivery of new pitches in the intervening period.

Table 4: 5 year supply from anticipated plan adoption date (2025)

	Gypsy and Traveller Pitches	Travelling Showpeople Plots
2025-30 Need (a)	86	8
Planning permissions (b)	17*	-
Site intensification (c)	44	8
New site allocations (d)	34	-
Total Supply (e) = (b+c+d)	95	8
Surplus = (e) - (a)	9	0
Years of supply 2024-29	5.52	5.00

<sup>\*</sup> Includes planning permissions 1 April to 31 July 2024

- 3.22 Nonetheless, beyond the first 5 years of the plan period (years 6+) as set out in Tables 1 and 2 the targets for pitches and plots come from household formation. The plan, in Policies GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) and GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites), by safeguarding sites and allowing for their intensification in effect identifies these as 'broad locations for growth'. It makes provision for additional pitches or plots to come forward where possible to meet identified on site needs over the plan period. Such need could also be met through pitch/plot turnover. Some of this need may also relate to single adults whose needs, as set out in paragraph 3.6, may be met on existing sites without the need for a formal pitch set up.
- 3.23 To ensure sufficient supply over the plan period to meet identified needs, Policies GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) and GT3 (New sites and intensification of existing sites) make provision for windfall sites that will be considered on a case by case basis. These are sites on unallocated land where sustainable development can be achieved, and planning permission granted to assist meeting identified local pitch need. They should meet the criteria in Policy GT3 (New sites and intensification of existing sites) and accord with other relevant policies of the development plan.

#### **Safeguarding Traveller Sites**

- 3.24 Most traveller sites in Wiltshire have planning permission or benefit from a Certificate of Lawfulness for the existing use. Some were granted planning permission when previous planning definitions for travellers were in force. Others do not benefit from planning permission but are now considered lawful through the passage of time where the site has been used as a traveller site for a continuous period of at least 10 years.
- 3.25 Safeguarding permitted sites to ensure that they can continue to provide accommodation now and for future needs forms part of the strategy set out in Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople). The GTAA confirms that future need for new pitches and plots from year 6 onwards arises on existing sites through household formation.
- 3.26 Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) therefore safeguards sites, as shown on the Policies Map, from other uses unless it can be demonstrated that they are no longer needed to meet any identified accommodation need for gypsies and travellers and travelling showpeople. This will ensure that there remains a supply of traveller sites throughout the plan period and needs can be met through turnover on sites. The number of pitches and plots on sites within Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) are set out within the GTAA<sup>32</sup>. The safeguarded sites, as they will appear on the Policies Map, are shown in Figures 28 to 58 in Appendix 2.
- 3.27 Some sites have planning permission with conditions attached that restrict the use of the site to named residents and sometimes this includes their resident dependants. In view of the overall need and to maintain a supply of suitable sites into the future it is generally appropriate to safeguard these sites also where acceptable in planning terms. In these instances, where there is an identified local need an application to vary the relevant restrictive condition will need to be submitted and assessed against policies of the development plan. It would not be appropriate however to safeguard any sites in the designated Green Belt, for this reason the site referred to as Shop Lane is excluded.
- 3.28 Some sites listed in Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) are also allocated in Chapter 4 of this Plan for additional growth that meets need in the first 5 years. They would see an increase in the number of pitches or plots and will require planning permission before they can be implemented.
- 3.29 The policy also covers new sites as soon as they receive planning consent where they are for households that meet the planning definition, including new permanent sites proposed for allocation in this Plan.
- 3.30 The approach to addressing the needs of travellers, as set out in the GTAA, that have never travelled but are ethnic gypsies or travellers and have protected characteristics is set out in Policy GT4 (Meeting needs of gypsies and travellers for culturally appropriate accommodation). This recognises that there is need arising from such households who are already residing on existing sites. Exceptionally therefore in the interest of family cohesion Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) allows for the intensification of existing sites to meet on site needs as identified through the GTAA. Given the exceptional nature of this, it will be important that conditions are used to manage future use of the site.

Figure 6 (Pages 31-36), 2024 GTAA. Sites are listed under 'site status' and number of pitches and plots on sites at April 2024 provided.

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#### Safeguarding gypsies and travellers, and travelling showpeople sites

The gypsies and travellers and travelling showpeople sites listed below and as shown on the Policies Map are safeguarded from alternative development unless they are no longer required to meet any identified needs for gypsies and travellers or travelling showpeople.

Any other site that is subsequently granted permanent planning permission for gypsies and travellers shall be safeguarded in accordance with this policy.

Exceptionally, provision of additional pitches or the siting of additional caravans that are for gypsies and travellers that do not meet the planning definition on the following sites will be supported where this meets a demonstrable on-site need and meets the site-specific criteria in Policy GT3 (New sites and intensification of existing sites). In such circumstances, planning conditions would be used to define the specific circumstances and manage future use of the site.

Table 5 provides a list of gypsy, traveller and showpeople sites which are safeguarded by Policy GT2, together with the figure in Appendix 2 in which the location of the site is shown.

Table 5: Gypsy, traveller and travelling showpeople sites which are safeguarded by Policy GT2, together with the figure in Appendix 2

Gypsy and Traveller Sites	Figures of site location
79 Southampton Road	Figure 54
Badgers Rest	Figure 53
Blandford Road	Figure 58
Bonnies Farm	Figure 44
Bournelake	Figure 28
Braemar	Figure 54
Braemar(2)	Figure 54
Bridge Paddocks	Figure 31
Broken Cross Bridge	Figure 52
Calcutt Park	Figure 28
Christian Place	Figure 38
Dairyhouse Bridge Gypsy Site	Figure 54
Dillons Farm	Figure 55
Easton Lane Gypsy and Traveller Site	Figure 39
Ernies Yard	Figure 46
Fairhaven Gypsy Site	Figure 45
Former Glenville Nurseries	Figure 47
Frampton Farm	Figure 36

Greenfield View Figure 28  Hatt Hill Figure 51  Hicks Leaze Figure 28  Hedgerow Stables Figure 44  Jacob Manor Figure 47  Land adjacent B4040 Figure 30  Land adjacent Bridge Paddocks (1) Figure 30  Land adjacent Bridge Paddocks (2) Figure 30  Land adjacent Hisomley Farmhouse Figure 45  Land adjacent Old Telephone Exchange Figure 36  Land adjoining Swindon & Cricklade Railway Figure 42  Land at Capps Lane (Shellbrook View) Figure 42  Land at Jane Oaks Farm Figure 50  Land at Orchard Paddock Figure 36  Land at West of Bayo2, Mapperton Hill Figure 45  Land at West of Penn Farm (2) Figure 37  Littleton Stables Figure 45  Littleton Stables  Little Acre Figure 56	Greenacres Mobile Park (adjacent	Figure 42
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# Assessing proposals for new gypsies and travellers and travelling showpeople sites and intensification of existing sites

- 3.31 The Plan proposes to meet identified need in Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) through safeguarding and intensification of existing sites, and new site allocations. It also identifies windfall sites as an additional source of supply to meet the identified needs of gypsies and travellers and travelling showpeople who meet the planning definition during the plan period. However, windfall sites should only be considered where there are no alternatives sites available including sites allocated in the Plan.
- 3.32 Policy GT3 (New sites and intensification of existing sites) (sets out the general locational criteria that should be met for new windfall sites, which will need to be considered alongside national polices and other development plan policies relating to, but not limited to: Green Belt (traveller sites are inappropriate development in the Green Belt), National Landscapes (formerly Areas of Outstanding Natural Beauty), World Heritage Sites, historic environment including archaeology, flood risk, internationally and nationally protected sites for biodiversity, contaminated land, transport etc. It also sets out site specific criteria to be applied in assessing proposals to help determine their suitability.
- 3.33 It is recognised that during the plan period there may be a demonstrable local need for additional accommodation on sites safeguarded and allocated through this Plan to meet the changing needs of on-site households. Policies GT1 (Meeting the needs of gypsies and travellers, and travellers, and travellers, and travellers, and travelling showpeople), GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) and GT4 (Meeting needs of gypsies and travellers for culturally appropriate accommodation) collectively set out policy requirements to be met depending on whether the need is for households who meet the planning definition for travellers, or it relates to households that do not but there is the need for culturally appropriate accommodation. In addition, Policy GT3 (New sites and intensification of existing sites) seeks to ensure that new sites in the open countryside are strictly controlled by requiring the occupants of these to have a demonstrable need and meet the planning definition.
- 3.34 The site-specific criteria included in Policy GT3 (New sites and intensification of existing sites) can apply equally when considering proposals for additional accommodation on existing sites to ensure that the site can accommodate the development and intensification does not lead to unacceptable impacts, including on acceptable living standards. They cover matters that are particularly relevant to the assessment of traveller site proposals, but other national and development plan policies will also apply and supplement these, including those relating to the historic environment, transport and ecology for example.
- 3.35 In assessing proposals for travelling showpeople or where mixed uses are proposed, the site and its surrounding context must be 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. The Showmen Guild of Great Britain<sup>33</sup> has produced guidance on design for travelling showpeople sites, which should also be taken into account in assessing proposals.

<sup>&</sup>lt;sup>33</sup> 'Travelling showpeople's sites - A Planning Focus. Model standard package', The Showmen's Guild of Great Britain, revised September 2007

- 3.36 Traveller site development in Wiltshire must, like other forms of residential development, also ensure that it does not have an adverse impact on internationally important protected sites, which are safeguarded for their ecological importance under the Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations).
- 3.37 Each protected site has a zone of influence or catchment area within which adverse impacts could occur if mitigation is not provided for alongside development. The protected sites are: the River Avon (Hampshire) Special Area of Conservation (SAC); Bath and Bradford on Avon Bats SAC; Salisbury Plain Special Protection Area (SPA); North Meadow and Clattinger Farm SAC; Solent Maritime SAC (catchment of the River Test); and New Forest protected sites. Where appropriate, measures will need to be secured for proposals consistent with the mitigation strategies for each protected site.

#### New sites and intensification of existing sites

Proposals for new gypsy and traveller sites and travelling showpeople sites will need to satisfy the following criteria, and accord with other policies in the development plan:

- i. Development is for occupants that meet the planning definition for gypsies and travellers or travelling showpeople and have an identified need; and
- ii. Site is located within a reasonable distance and safely accessible to local services and community facilities, in particular a primary school and a doctor's surgery or health centre.

Proposals for new sites and intensification of existing sites will need to meet the following criteria and accord with other policies in the development plan where relevant to the site:

- iii. Development of the site alone or in combination with other traveller sites respects the scale of, and does not dominate, the nearest settled community.
- iv. Safe vehicular and pedestrian access can be provided and maintained for all users including emergency vehicles and refuse collection vehicles.
- v. Highway network can accommodate vehicles likely to be generated by the site and development does not result in unacceptable impact on highway safety.
- vi. Services can be provided, such as water, power, sewerage and drainage. Where practicable, development should connect to the mains, or an alternative acceptable solution can be achieved.
- vii. Appropriate space and screening for bins on-site and kerbside to enable storage and collection of waste.
- viii. Proposals should be accompanied by a drainage strategy that applies the surface water hierarchy and demonstrates the suitability of proposed foul drainage solutions.
- ix. Sufficient space is provided within the site layout for safe vehicle parking and turning, circulation space, residential amenity and play areas, as well as separation of family pitches/plots in the interest of adequate privacy.
- x. Development would not result in unacceptable levels of noise, air quality and light pollution.

- xi. Development would not result in unacceptable harm to landscape character, result in the loss or harm to existing important landscape features.
- xii. Development can be landscaped and/or screened to reflect the character and appearance of the area around the site to ensure the development does not appear isolated and does not unacceptably impact on the amenity of neighbouring properties.
- xiii. Development should not adversely impact on public rights of way.
- xiv. Buffers can be provided to protect sensitive habitats and lighting designed to avoid illumination of sensitive habitats.
- xv. Development can protect and retain ecological features so that their value, connectivity, and functionality remain intact.

All planning permissions will be subject to conditions to ensure use of the site is appropriately managed.

#### Addressing need for culturally appropriate accommodation

- 3.38 In line with national policy, the Plan does not set targets or allocate land to meet the need from travellers that do not meet the planning definition. However, the GTAA recognises that there are households that have never travelled for work purposes but are ethnic gypsies or travellers and have protected characteristics in Equality Law. As such, there may be the need for culturally appropriate accommodation, for instance mobile homes rather than bricks and mortar housing.
- 3.39 Any proposals for new culturally appropriate accommodation should be determined against housing policies in the Local Plan to ensure that caravan parks or new mobile home developments are consistent with locational requirements for general housing developments. This is because such accommodation should not enjoy the flexible policy regime afforded to new sites for travellers that meet the planning definition in national policy. New sites for non-definition households are not therefore supported through Policy GT3 (New sites and intensification of existing sites).
- 3.40 The 2024 GTAA identifies an accommodation need from 70 households during the plan period who do not meet the planning definition. For the first 5 years, 48 households have an identified need, of which 24 are teenagers<sup>34</sup>.
- 3.41 There are existing lawful park home sites in Wiltshire that could provide culturally appropriate accommodation to help meet identified need for this household category. This may form a source of housing to meet needs through turnover within the normal housing market.
- 3.42 Exceptionally, in the interest of family cohesion and because gypsy and traveller households that do not meet the planning definition are already residing on existing sites, as recognised in the GTAA, Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) allows for the intensification of existing sites to meet the on-site identified needs within the 2024 GTAA where it is otherwise acceptable in planning terms. Chapter 4 of the plan also includes site allocations for an additional 6 pitches on such sites in line with this exceptional approach. Other sites safeguarded under Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites) may also provide an additional source of supply later in the plan period.

- Any remaining unmet need for households identified within the GTAA that do not meet the planning 3.43 definition but have a need can be met through windfall proposals that are consistent with relevant strategic settlement and housing policies in the Local Plan. The Settlement Strategy and Delivery Strategy of the adopted Wiltshire Core Strategy (Core Policies 1 and 2) and emerging Wiltshire Local Plan (Policies 1 and 2) set out the strategic policies for the location and delivery of new housing. The Settlement Strategy identifies those settlements where housing development is supported, and delivery strategy provides more detail about how sites should be brought forward at those places. The settlements categorised as Principal Settlements, Market Towns, Local Service Centres and Large Villages all have defined settlement boundaries, as set out on the policies map, within which new housing is generally supported where it is consistent with other development plan policies. Small Villages are also identified, while these do not have defined boundaries, infill housing development is supported in their existing built-up areas where it is consistent with the other requirements of policy, as well as those in the wider development plan. Policies also allow in certain circumstances for housing developments to be brought forward through neighbourhood plans adjacent to these settlements, or through site allocations in a Development Plan Document.
- 3.44 The approach to addressing needs through these sources is set out in Policy GT4 (Meeting needs of gypsies and travellers for culturally appropriate accommodation). This also requires that proposals must meet an identified need for ethnic travellers that do not meet the planning definition but nonetheless are covered by the stipulations in the Equality Act. This is to meet the objectives of this Plan and to ensure that provision can be monitored effectively against identified need.

# Meeting needs of gypsies and travellers for culturally appropriate accommodation

The identified local accommodation needs for persons that do not meet the planning definition but identify as travellers in line with the stipulations in the Equality Act 2010 will be met by:

- i. Site allocations for intensification of existing sites;
- ii. Safeguarded sites listed in Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites);
- iii. Proposals for sites that are within settlements identified in the Settlement Strategy and consistent with other relevant development plan policies; and
- iv. Sites that are brought forward through neighbourhood plans or a subsequent site allocation plan.

## Meeting temporary accommodation needs

3.45 Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) makes provision for 3 emergency stopping sites by 2029 to address the lack of temporary accommodation in Wiltshire. Chapter 4 of the Plan allocates a first emergency stopping site in the north of the county and the council is committed to identifying and delivering a further 2 sites in the south and west of the county in accordance with Policy GT5 (Emergency Stopping Sites). The use of these sites will be monitored to inform the need for further provision across the plan period.

- 3.46 Wiltshire Council routinely manages unauthorised encampments as described in the GTAA<sup>35</sup> and operates a tolerating approach to unauthorised encampments where practicable<sup>36</sup>. The council works with travellers on a case-by-case basis to manage the circumstances of their stay and assist with matters such as ensuring the welfare of vulnerable persons within a group under statutory provisions.
- 3.47 There may however be situations where travellers wish to access a designated site on their way through the county. There may also be cases where the council working with the police need to direct travellers away from an encampment to a suitable site within the county under provisions in enforcement legislation<sup>37</sup>.
- 3.48 Consistent with the recommendations in the GTAA, Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) proposes 3 emergency stopping sites in the north, west and south of Wiltshire to form a basic network of sites that could be used where required. 3 sites are proposed given the size of the county and the presence of strategic travelling routes such as the M4, the A36 and the A350<sup>38</sup>. The position of these should take into consideration the location of any existing or planned temporary accommodation in neighbouring authorities to ensure they complement temporary provision in those areas and help form part of a wider network of temporary accommodation. The Key Diagram (Figure 1) identifies broad locations for emergency stopping sites.
- 3.49 Emergency stopping sites are basic sites with limited facilities equipped with hardstanding, fence, and rubbish disposal as a minimum but portable toilets, water and sewage disposal could also be made available, consistent with Government advice<sup>39</sup>. They can be occupied by groups for a limited period, ordinarily no more than 28 days. Each site should provide facilities to support 6 touring caravans and their vehicles as most unauthorised encampments in Wiltshire are small. Proposals will be assessed against the criteria in Policy GT5 (Emergency Stopping Sites) and other policies in the development plan as appropriate.
- 3.50 The Council's Emergency Stopping Places Strategy (July 2018) will be reviewed and updated as appropriate to set out the Council's approach to ensuring delivery of emergency stopping sites in accordance with policies GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) and GT5 (Emergency Stopping Sites).
- 3.51 The criteria in Policy GT5 (Emergency Stopping Sites) have been shaped using the site selection criteria in the Emergency Stopping Places Strategy, which have been refined and developed to reflect the key policy considerations for emergency stopping sites. These will need to be considered alongside policies in the wider development plan including those on landscape, ecology, historic environment and drainage.
- 3.52 A first site at Thickthorn Farm is allocated in Chapter 4 of the Plan under Policy GT31 (Land at Thickthorn Farm) for which capital funding has been secured.

<sup>35</sup> Paragraphs 7.53 to 7.55, 2024 GTAA

<sup>36</sup> https://www.wiltshire.gov.uk/article/1745/Unauthorised-Encampments

<sup>37</sup> Section 62A Criminal Justice and Public Order Act

<sup>38 &</sup>lt;u>Page 54, 2024 GTAA</u>

Department for Levelling Up, Housing and Communities: Policy Paper Traveller Site Fund 2022/23 - prospectus, updated 19 May 2022.

#### **Emergency Stopping Sites**

Emergency stopping sites provided by the council in accordance with Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) should:

- i. Be located near, and accessible, to key travelling routes to form a network of sites in the north, west and south of the county;
- ii. Be located to avoid adverse impacts on environmental designations, biodiversity and areas of flood risk or other hazards including contaminated land;
- iii. Not have an unacceptable impact on land uses in the surrounding area including the amenity of neighbouring properties and on the character and appearance of the landscape;
- iv. Be served by an independent safe vehicular access including for emergency vehicles and not have an unacceptable impact on the safe operation of the highway network;
- v. Accommodate 6 touring caravans and parking for towing vehicles, and space for vehicular movements including turning, onsite facilities, circulation space and to enable fire safety standards to be met; and
- vi. Provide for appropriate boundary treatment around the site to contain the use, mitigate any visual impact on the landscape and avoid unacceptable impacts on residential amenity for both occupiers and neighbouring properties.

# 4 Site Allocations

- 4.1 The strategy for meeting needs, as set out in Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople), includes the intensification of existing sites to enable the most efficient use of land as well as new allocations to help meet need within the first 5 years of the Plan. All allocations in this section will need to be assessed against Policy GT3 (New sites and intensification of existing sites) as well as the specific requirements identified in the individual policies for each allocation.
- 4.2 Intensification of sites will meet an on-site need for additional permanent pitches for gypsies and travellers and permanent plots for travelling showpeople that meet the planning definition.
- 4.3 In total, policies for the intensification of existing sites will deliver 44 pitches for gypsies and travellers, and 8 plots for travelling showpeople, that meet the planning definition, as set out in the following table:

**Table 6: Allocations for site intensification (planning definition)** 

Policy Reference	Site Name	New Pitches/Plots	
Gypsy and Travellers	Gypsy and Travellers		
Policy GT6	Braemar	5	
Policy GT7	Calcutt Park	1	
Policy GT8	Dillons Farm	1	
Policy GT9	Easton Lane	3	
Policy GT10	Lansdowne	7	
Policy GT11	Oak Tree Field	14	
Policy GT12	Poplar Tree Residential Park	7	
Policy GT13	The Poplars	2	
Policy GT14	Rose Field Caravan Site	2	
Policy GT15	Land to the South of Bridge Paddocks	2	
Total		44	
Travelling showpeople			
Policy GT16	Land Opposite the Laurels	3	
Policy GT17	Land adjacent Nursteed Park	4	
Policy GT18	Petersfinger Business Park	1	
Total		8	

**4.4** Exceptionally, consistent with Policy GT4 (Meeting needs of gypsies and travellers for culturally appropriate accommodation), provision is made for 6 additional pitches allocated on 5 sites for an on-site need from gypsy and traveller households that do not meet the planning definition.

Table 7: Allocations for site intensification (do not meet planning definition)

Policy Reference	Site Name	New Pitches
Gypsy and Travellers		
Policy GT19	Former Glenville Nurseries	1
Policy GT20	Greenfield View	1
Policy GT21	Land at Capps Land	1
Policy GT22	Melbourne View	1
Policy GT23	79 Southampton Road	2
Total		6

- 4.5 New deliverable site allocations have been identified to help meet the need for gypsy and traveller pitches from households that meet the planning for the period 2024-29.
- 4.6 In total, policies for the following site allocations are proposed to deliver 34 permanent pitches by 2029, consistent with the broad locational and site-specific criteria in Policy GT3 (New sites and intensification of existing sites).

**Table 8: New Site Allocations (planning definition)** 

Policy Reference	Site Name	New Pitches
Gypsy and Travellers		
Policy GT24	Bushton North Farm, Bushton	3
Policy GT25	Housecroft Farm 1, Edington	2
Policy GT26	Housecroft Farm 2, Edington	2
Policy GT27	Land at Cleverton, Cleverton	10
Policy GT28	Oxhouse Farm, Rowde	10
Policy GT29	Upper Seagry Farm, Upper Seagry	5
Policy GT30	Whistley Road, Potterne	2
Total		34

4.7 Consistent with Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) and Policy GT5 (Emergency Stopping Sites), Policy GT31 (Land at Thickthorn Farm) also allocates a single emergency stopping site for 6 pitches on Land at Thickthorn Farm.

#### Site Intensification

#### Policy GT6: Braemar and Braemar (2), Shaftesbury Drove, Coombe Bissett

- 4.8 There are 2 lawful gypsy and traveller sites in this location: Braemar (2 pitches) and Braemar (1 pitch). The wider land also hosts a bricks and mortar property named 'Hill View'. The GTAA identifies an accommodation need of 4 pitches at Braemar (2) and 1 at Hill View. There is also evidence of potential teenage accommodation need by 2029.
- **4.9** Policy GT6 (Braemar and Braemar (2)) allocates 5 pitches to meet the combined identified pitch need on undeveloped land within the wider site area. The land provides flexibility to offer shared dayrooms and touring caravans, to meet identified need from teenagers.
- **4.10** The site lies within the River Avon SAC catchment. An Appropriate Assessment required by the Habitat Regulations will be undertaken by the council following the submission of a planning application. Applicants need to follow Wiltshire Council's advice on its website in terms of nutrient neutrality<sup>40</sup>.
- **4.11** A package treatment plant is required to manage foul drainage in the absence of a sewer connection.
- **4.12** The Shaftesbury Drove (on the southern boundary of the site) is a key piece of green infrastructure, which has potential to be used as a flightline for bats. Boundary planting and screening will be required, also in the interest of protecting the Right of Way.
- 4.13 The site is in open land between 2 recorded cropmark complexes of likely later prehistoric field systems in an area of generally high archaeological potential. Further investigation is therefore required, including a geophysical site survey and trial trench evaluation to identify any heritage assets, and assess the impact of the development proposal and inform mitigation measures, as necessary.
- **4.14** The site falls within the zone of influence of the New Forest protected sites and mitigation for recreational pressures will be required.

#### Braemar and Braemar (2)

Land at Braemar and Braemar (2), as identified on the Policies Map, is allocated for the development of an additional 5 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should also comply with the following requirements:

- i. Secure mitigation measures in accordance with the requirements of the Council's nutrient neutrality strategy.
- ii. Deliver an acceptable drainage strategy that sets out how surface and foul water drainage will be achieved.
- iii. Ensure that landscape and ecological mitigation is delivered, including the formation of a 10-meter buffer of native trees and shrubs within the site, along the southern boundary.
- iv. Ensure the retention of the northern hedgerow.
- v. Ensure that any identified heritage assets are conserved with mitigation measures secured, where necessary.
- vi. Secure a financial contribution to the New Forest Protected Sites Mitigation Strategy

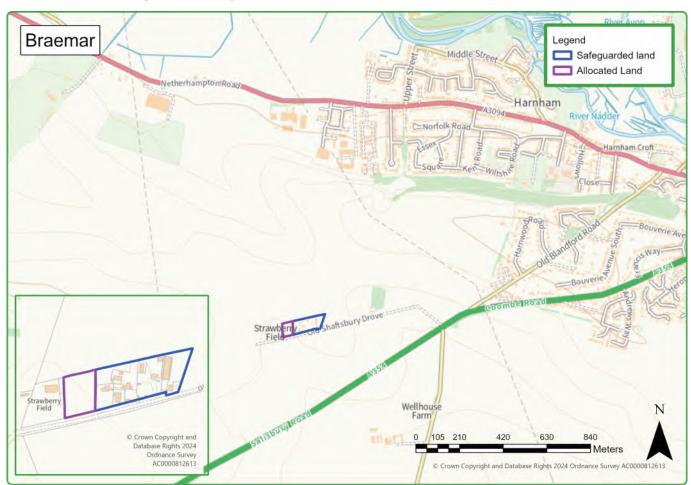


Figure 2: Policy GT6 - Braemar and Braemar (2) Site Allocation

#### Policy GT7: Calcutt Park, Calcutt, Cricklade

- 4.15 Calcutt Park is an existing lawful gypsy and traveller site with 12 permitted pitches, situated outside Cricklade to the east of the A419. The GTAA identifies an on-site need for 1 pitch. Pitch 12 is proposed for intensification with 1 additional pitch in Policy GT7 (Calcutt Park). The GTAA also identifies that by 2029 there may be an accommodation need from teenagers on the wider site. The approved pitches at this site may accommodate additional touring caravans if required.
- **4.16** A payment will be required towards the North Meadows and Clattinger Farm SAC Mitigation Strategy before commencement of development to mitigate for increase in visitor numbers to that area. The eastern boundary planting requires retention and protection in perpetuity.

#### **Policy GT7**

#### Calcutt Park

Land at Calcutt Park, as identified on the Policies Map, is allocated for the development of 1 additional gypsy and traveller pitch by way of subdivision of Pitch 12, where it accords with policies in the development plan. Proposals should also comply with the following requirements:

- i. Ensure acceptable surface and foul water drainage measures are delivered within the site.
- ii. Provide appropriate fencing within the site to ensure the retention and protection of the eastern boundary planting.
- iii. Ensure the illumination of habitats is avoided by directing artificial lighting away from the eastern boundary.
- iv. Secure a financial contribution to the North Meadows and Clattinger Farm SAC Mitigation Strategy.



Figure 3: Policy GT7 - Calcutt Park Site Allocation

#### Policy GT8: Dillons Farm, Dean Road, East Grimstead

- 4.17 Dillons Farm is a lawful gypsy and traveller site with a single pitch, situated to the southeast of East Grimstead, adjacent to Dean Road. The GTAA identifies a need for 1 gypsy and traveller pitch. Accordingly, Policy GT8 (Dillons Farm) allocates an additional pitch at this site.
- **4.18** Site access improvements will be required. If this requires hedgerow removal this will need replanting on a new alignment.
- **4.19** The site lies in the catchment of the River Test and applicants need to follow Wiltshire Council's advice on its website in terms of nutrient neutrality<sup>41</sup>. An Appropriate Assessment required by the Habitat Regulations will be undertaken by the Council following the submission of a planning application.
- **4.20** A package treatment plant is the required option for off-grid foul drainage management. There is groundwater flood risk present on site which requires further investigation. A drainage strategy should be submitted with a planning application to demonstrate how the groundwater flood risk, surface water and foul water drainage will be managed.
- **4.21** The site lies on the edge of the zone of influence for Mottisfont Bats SAC, which is in Hampshire. Mitigation to buffer hedgerows will therefore be required to avoid adverse effects. The site also falls within the zone of influence of the New Forest protected sites and mitigation for recreational pressures will be required.

**4.22** Due to the proximity to the rail line a noise assessment is required to inform a proposal in the interest of residential amenity and the occupant's health.

#### **Policy GT8**

#### **Dillons Farm**

Land at Dillons Farm, as identified on the Policies Map, is allocated for the development of 1 additional gypsy and traveller pitch where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Secure mitigation measures in accordance with the requirements of the Council's nutrient neutrality strategy.
- ii. Provide an improved access to meet visibility requirements for highway safety, with hedgerow replanting if required.
- iii. Deliver sufficient drainage measures to manage surface water, mitigate risk from groundwater flooding and provide foul water drainage.
- iv. Incorporate 10-metre buffers to hedgerows to ensure protection against adverse effects on existing hedgerows.
- v. Ensure the delivery of measures to mitigate any identified adverse impacts from noise, including from the railway to the south of the site to protect residential amenity of future site occupants.
- vi. Secure a financial contribution to the New Forest Protected Sites Mitigation Strategy.

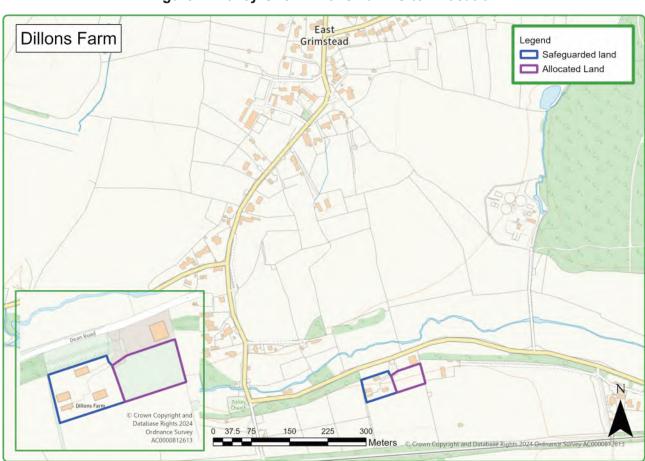


Figure 4: Policy GT8 - Dillons Farm Site Allocation

#### Policy GT9: Easton Lane, Chippenham

- **4.23** This site hosts 5 lawful gypsy and traveller pitches and is situated to the south-west of Chippenham near the Thingley rail junction. The GTAA identifies an accommodation need for 3 pitches and there may be accommodation need from teenagers by 2029.
- **4.24** Policy GT9 (Easton Lane) allocates an additional 3 permanent pitches. The existing permitted pitches are of sufficient size to accommodate additional touring caravans to address accommodation need from teenage children, if required by 2029.
- **4.25** Improvements to the existing access are needed in the interest of highway safety as set out in policy.
- **4.26** There is groundwater flood risk which needs to be addressed in a drainage strategy. Proposals should include native tree planting to mitigate views from the wider area, break up visual massing, deliver effective countryside transition and provide improved landscape structure.
- **4.27** The site is located above a historic landfill site. Ground investigations are required in accordance with the Council's adopted Contaminated Land Supplementary Planning Document (December 2012) and the adopted Contaminated Land Strategy<sup>42</sup>. If contamination is identified, a remediation scheme should be submitted with the planning application to identify the measures required to mitigate the risk from pollution.
- **4.28** A 25m wide high-quality habitat lies adjacent to the railway lines and should be retained.
- **4.29** The site is situated between 2 rail lines. A noise assessment will be required to ascertain the need for mitigation required to ensure acceptable living conditions for pitch occupants.

## **Policy GT9**

#### **Easton Lane**

Land at Easton Lane, as identified on the Policies Map, is allocated for the development of 3 additional gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Provide an improved access and ensure that any gates are set back a sufficient distance from the site access, in the interests of highway safety.
- ii. Deliver sufficient drainage measures to manage surface water, manage the risk from groundwater flooding and provide foul water drainage.
- iii. Provide sufficient landscaping within the site, incorporating native tree planting to mitigate the landscape impacts of the development.
- iv. Prevent unacceptable risk to future occupiers from pollution by securing the implementation of remediation measures, as necessary.
- v. Ensure the retention of the existing 25m wide habitat adjacent to the railway lines.
- vi. Ensure the delivery of measures to mitigate any identified adverse impacts from noise, including from the railways to the east and west of the site.

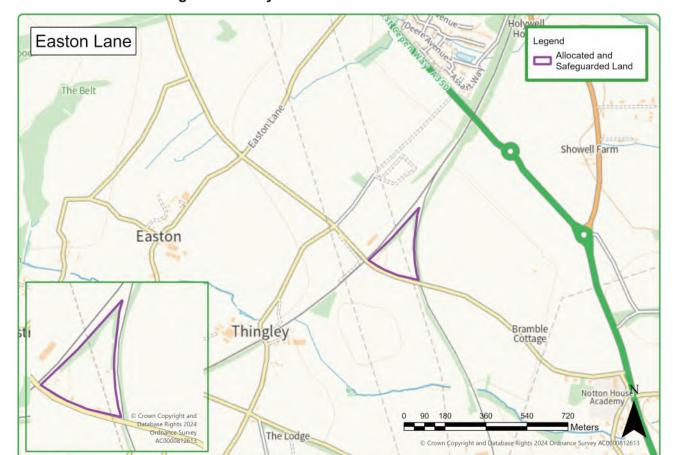


Figure 5: Policy GT9 - Easton Lane Site Allocation

#### Policy GT10: Lansdowne, Trowbridge Road, Semington

- **4.30** This site is situated to the south of Semington at the A361 roundabout. It has permission for a total of 7 gypsy and traveller pitches.
- **4.31** The 2024 GTAA identifies an accommodation need of 7 additional pitches at this site and there may also be an accommodation need for teenage children by 2029.
- **4.32** Policy GT10 (Lansdowne) proposes an additional 7 pitches at this site. Based on the evidence in the site assessment, there remains limited space for additional touring caravans to meet the accommodation needs of teenage children. However, if fewer dayrooms are proposed there may be space to accommodate a small number of additional touring caravans if required.
- 4.33 A transport statement should be submitted with a planning application including vehicle tracking information. Highway and access improvements will be required to secure the required visibility splays at the site entrances and A361 junction, ensure sufficient space is available for all vehicles to safely manoeuvre and provide passing bays in the vicinity of the site. There is no public sewer connection and package treatment plants could prove a viable option. A drainage strategy should be submitted with a planning application to demonstrate how surface and foul water will be managed.
- 4.34 In terms of landscape and amenity, the site would benefit from the planting of native hedgerow frontage boundaries turning into the site and avoid long lengths of wall and solid timber fences. Screening would also assist mitigating the visual impacts of development on the users of footpaths SEMI14, 19 and 21.

- 4.35 The site lies just within the 2km core area of a Large Lesser Horseshoe Bat roost. An ecological impact assessment report should be submitted to assess the impact of the proposed development and include mitigation measures including ensuring that external artificial lightings are avoided. The site would benefit from buffers and fencing to separate development from highway planting, noise and fumes.
- **4.36** Due to the proximity of the site to the A361 a noise assessment will be required to ascertain the need for mitigation required to ensure acceptable living conditions.

#### Lansdowne

Land at Lansdowne, as identified on the Policies Map, is allocated for the development of 7 additional gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Deliver safe access(es) to the site, including necessary visibility splays at the site entrances and at the A361 junction, sufficient manoeuvring space and passing bays, as required in the interests of highway safety.
- ii. Deliver sufficient drainage measures to manage surface water and provide foul water drainage.
- iii. Ensure landscape mitigation is provided by incorporating native hedgerow planting at the site's southern boundary.
- iv. Ensure that the proposed development is designed to ensure that identified bat habitat is not adversely affected by artificial lighting.
- v. Incorporate buffer planting and fencing to separate the site from the highway, in the interests of amenity.
- vi. Ensure the delivery of measures to mitigate any identified adverse impacts from noise, including from the A361 to the north.



Figure 6: Policy GT10 - Lansdowne Site Allocation

## Policy GT11: Oak Tree Field, Odstock

- **4.37** This gypsy and traveller site has 32 lawful pitches and is situated to the north of Salisbury Hospital. The GTAA identifies an accommodation need for a single pitch and there may be accommodation need from teenagers on site by 2029.
- 4.38 The site was subject to a lapsed planning application for 14 additional pitches on the former transit site, in 2014. As a result, Policy GT11 (Oak Tree Field) allocates approximately 14 pitches accordingly, on the former transit section of the site which is previously developed land. There would be sufficient space to accommodate need from teenagers if required.
- **4.39** There is evidence of high groundwater which needs to be investigated. If the development is at risk from groundwater flooding, a drainage strategy should be submitted to demonstrate how this risk will be managed to protect the development.
- 4.40 The site lies within the River Avon SAC catchment. Appropriate Assessment will be undertaken by the Council following submission of a planning application. Applicants need to follow Wiltshire Council's advice on its website in terms of nutrient neutrality<sup>43</sup>. The site also falls within the zone of influence of the New Forest protected sites and mitigation for recreational pressures will be required.

#### Oak Tree Field

Land at Oak Tree Field, as identified on the Policies Map, is allocated for approximately 14 additional gypsy and traveller pitches where this accords with policies in the development plan. Proposals should also comply with the following requirements:

- i. Secure mitigation measures in accordance with the requirements of the Council's nutrient neutrality strategy.
- ii. Deliver sufficient drainage measures to manage surface water, mitigate risk from groundwater flooding and provide foul water drainage.
- iii. Secure a financial contribution to the New Forest Protected Sites Mitigation Strategy.

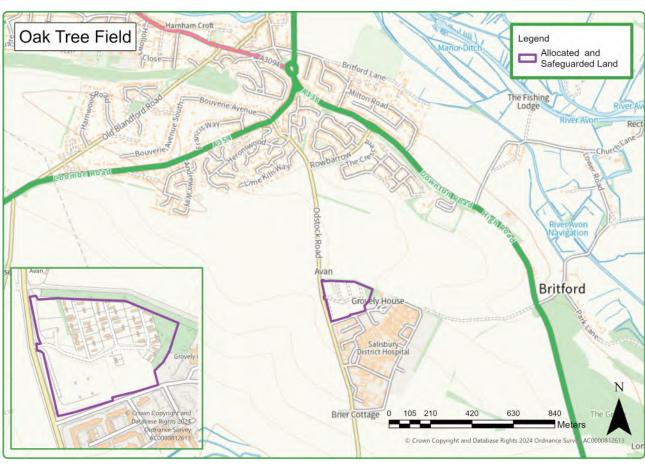


Figure 7: Policy GT11 - Oak Tree Field Site Allocation

#### Policy GT12: Poplar Tree Residential Park, Southwick

- 4.41 This site hosts 5 lawful gypsy and traveller pitches and is situated at the junction between Poplar Tree Lane and Frome Road, Southwick. The GTAA identifies a need for 7 additional pitches at this site and there may be an accommodation need from teenagers by 2029.
- **4.42** Policy GT12 (Poplar Tree Residential Park) identifies an additional 7 pitches at this site to meet identified need, by way of pitch subdivision and utilising undeveloped areas within the centre of the site. Additional touring caravans could also be stationed on the site, given the size of the pitches, to meet teenage children's accommodation needs by 2029 if required.
- 4.43 There are various surface and foul drainage schemes in place for the current lawful development, consented and implemented over time. A drainage strategy should consider how the development will be comprehensively serviced with foul and surface water drainage solutions and include the measures proposed to manage the surface and foul water for the proposed development. Existing boundary vegetation along the A361 should be retained, increased in width to 5-meters and protected by substantial fencing.
- **4.44** The site falls within the Trowbridge Bat Mitigation Strategy habitat mitigation zone, but it is not considered to contribute to bat habitat in any significant way. An Appropriate Assessment will be undertaken by the Council following submission of a planning application in accordance with the Habitat Regulations.

#### **Policy GT12**

#### Poplar Tree Residential Park

Land at Poplar Tree Residential Park, as identified on the Policies Map, is allocated for the development of additional 7 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Provide details of the drainage strategy for the site and provide sufficient drainage measures for surface and foul water drainage.
- ii. Secure the retention, enhancement and protection of the existing boundary vegetation along the A361. The hedgerow should be increased in width to 5-metres and protected by fencing to provide a sufficient buffer and enhance existing habitats.
- iii. Ensure that the proposed development is designed to ensure that identified bat habitat is not adversely affected by artificial lighting.
- iv. Secure a financial contribution to the Trowbridge Bat Mitigation Strategy.



Figure 8: Policy GT12 - Popular Tree Residential Park Site Allocation

#### Policy GT13: The Poplars, Sand Pit Lane, Dilton Marsh

- 4.45 The Poplars is a lawful gypsy and traveller site with 2 pitches at Sand Pit Lane, Dilton Marsh. The GTAA identifies a need for 2 additional pitches. Policy GT13 (The Poplars) allocates 2 additional pitches at this site to meet identified need.
- **4.46** Highway and access improvements will be required for the development given the narrow carriageway in this location.
- **4.47** Foul and surface water drainage solutions must be explored in greater detail in a Drainage Strategy that supports a planning application. There is evidence of groundwater flooding and no sewer connections are available.
- 4.48 The site is within a risk zone for great crested newts and the core area of a greater horseshoe bat roost at Westbury Leigh. Effects on the Bath and Bradford on Avon Bats SAC are considered minimal, but development should avoid illumination of boundary habitats, and incorporate buffers where practical.
- **4.49** The site is situated adjacent to the rail line. A noise assessment will be required to ascertain if mitigation will be required to ensure acceptable living conditions for site occupants.
- **4.50** The site lies within the zone of influence for the Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.

#### The Poplars

Land at the Poplars, as identified on the Policies Map, is allocated for the development of 2 additional gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Secure visibility splays of 2.4m x 43m at the site access to ensure and maintain highway safety.
- ii. Deliver a passing bay scheme on land within the boundary of the allocation.
- iii. Deliver sufficient drainage measures to manage surface water, manage risk from groundwater flooding and provide foul water drainage. Avoid illumination of boundary habitats.
- iv. Appropriate mitigation is in place for the Salisbury Plain Special Protection Area Mitigation Strategy.
- v. Ensure the delivery of measures to mitigate any identified adverse impacts from noise, including from the railway.

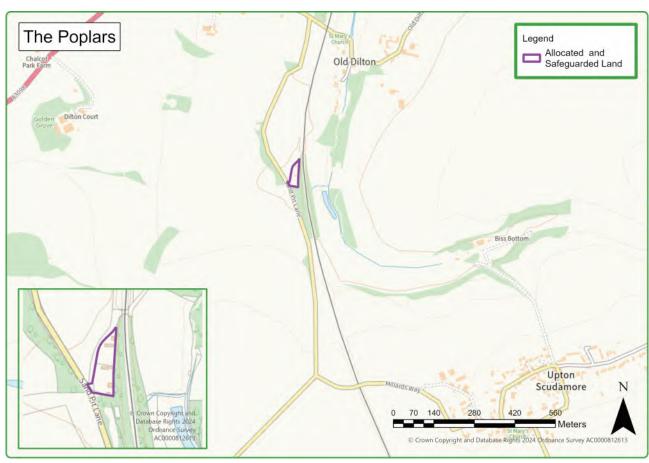


Figure 9: Policy GT13 - The Poplars Site Allocation

## Policy GT14: Rose Field Caravan Site, Hullavington

- 4.51 This lawful site hosts 6 pitches and is situated to the east of Hullavington. The GTAA identifies a need for 2 additional pitches. Policy GT14 (Rose Field Caravan Site, Hullavington) allocates this site for the development of 2 additional pitches.
- 4.52 The site is located in a high groundwater area. A drainage strategy will need to be submitted setting out how surface water and foul drainage are to be managed.
- **4.53** Existing boundary vegetation should be retained and maintained, and no external lighting should be included in a development proposal.

## **Policy GT14**

## Rose Field Caravan Site, Hullavington

Land at Rose Field Caravan Site, as identified on the Policies Map, is allocated for the development of 2 additional gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Deliver sufficient drainage measures to manage surface water, manage the risk from groundwater flooding and provide foul water drainage.
- ii. Ensure the retention and maintenance of boundary vegetation.
- iii. Avoid installation of external lighting that could illuminate boundary vegetation.

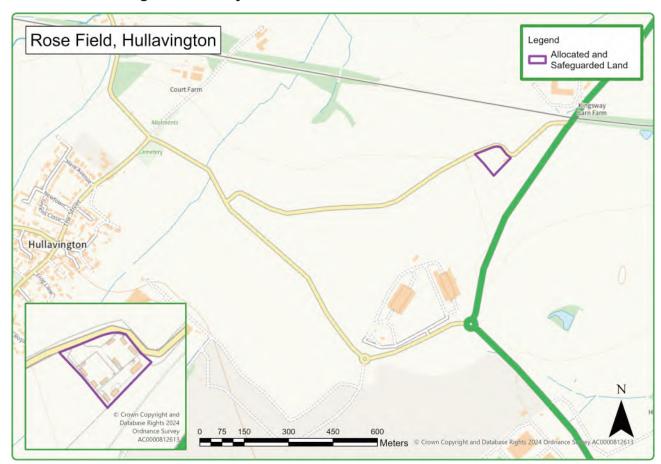


Figure 10: Policy GT14 - Rose Field Caravan Site Allocation

## Policy GT15: Land south of Bridge Paddocks

- **4.54** This lawful site hosts 4 gypsy and traveller pitches and is located between Royal Wootton Bassett and Leigh, along Braydon Road.
- **4.55** The GTAA identifies a need for 2 additional pitches at this site. Policy GT15 (Land south of Bridge Paddocks) allocates the site for an additional 2 pitches to the east of the internal access track.
- 4.56 Creation of a safe access is required, to maintain visibility splays 2.4 metres x 125m to the right and 215m to the left of the access. A licence will be required to undertake works on land forming part of the highway.
- 4.57 Implementation of vehicular access might require native hedgerow removal in which case a native hedgerow should be replanted along the back edge of any adjusted alignment as part of an enforceable hard and soft landscaping scheme.
- **4.58** Sufficient standoff from the edge of development to the public footpath PURT126 route will be necessary in the interest of protecting amenity.
- **4.59** A drainage strategy will need to be submitted setting out how surface water and foul drainage are to be managed.
- 4.60 The site lies within the 9.4km mitigation zone for North Meadow and Clattinger Farm SAC. A payment will be required towards the North Meadows and Clattinger Farm SAC Mitigation Strategy before commencement of development to mitigate for increase in visitor numbers to that area.
- **4.61** Impacts from external lighting on the adjacent woodland to the east and south of the site must be avoided. Any proposal submitted should demonstrate sufficient fencing and landscaping of development to avoid impacts on the woodland.
- 4.62 There may be possible impacts on great crested newts as the development would lie within an amber risk zone adjacent to the woodland and within 250m of a pond. An assessment should be undertaken to confirm the likelihood of, or presence of great rested newts and any measures required to mitigate the impact of the development on great crested newts and their habitat should be identified and secured.

#### Land South of Bridge Paddocks

Land at South of Bridge Paddocks, as identified on the Policies Map, is allocated for the development of 2 additional gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Securing visibility splays of 125m (right) and 215m (left), with access setback 2.4m from the carriageway, in the interest of highway safety.
- ii. Replanting of native hedgerow on new alignment where required for creation of safe access.
- iii. Secure appropriate hard and soft landscaping as part of development.
- iv. Deliver sufficient drainage measures to manage surface water and provide foul water drainage.
- v. Avoid installation of external lighting that could illuminate woodland to the east and south.
- vi. Secure sufficient standoffs to mitigate impacts on public footpath PURT126.
- vii. Secure a financial contribution to the North Meadow and Clattinger Farm SAC Mitigation Strategy.
- viii. Secure appropriate mitigation for great crested newts, as required.

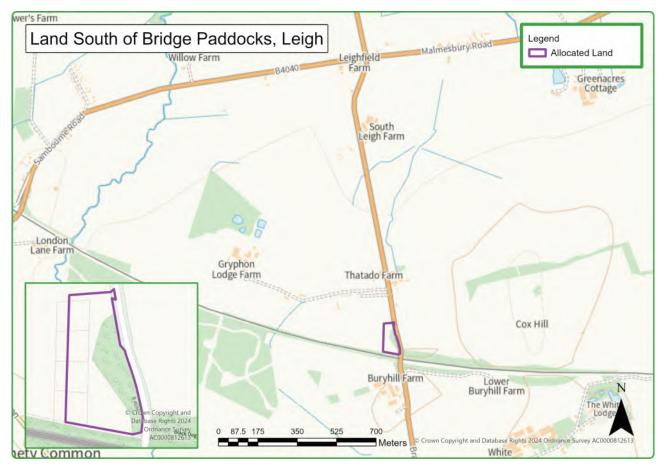


Figure 11: Policy GT15 - Land South of Bridge Paddocks Site Allocation

# **Travelling Showpeople**

## Policy GT16: Land opposite the Laurels, Heywood

- 4.63 This site hosts 5 lawful travelling showpeople plots and an area for storage of equipment. It is situated between Trowbridge and Westbury. The 2024 GTAA identifies a need for an additional 3 plots at this site and accommodation for teenagers may be required by 2029.
- **4.64** Policy GT16 (Land opposite the Laurels) allocates 3 additional showpeople plots at this site to meet identified need. There would also be scope to station touring caravans to meet accommodation need from teenagers if required.
- **4.65** A drainage strategy will need to be submitted setting out how surface water and foul drainage are to be managed.
- **4.66** The site is crossed by public footpath HEYW16. The path would benefit from diversion round the north-east of the site as a minimum and could provide better network links, in collaboration with the adjacent landowner.
- **4.67** Given the stationing of high-sided vehicles the site would benefit from new native tree planting and hedgerow reinforcement around its boundaries. Encroachment should not go further than 5m from the centre line of on-site hedgerows.
- 4.68 The site lies within the Trowbridge Bat Mitigation Strategy area and would contribute to recreational pressure at Round Wood and Picket and Clanger Woods. Hedgerows should be buffered in any development proposal. An Appropriate Assessment would be undertaken by the Council following submission of a planning application.
- **4.69** The site also lies in the zone of influence for Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.

# **Policy GT16**

#### Land opposite the Laurels

Land opposite the Laurels, as identified on the Policies Map, is allocated for the development of 3 additional travelling showpeople plots where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Deliver sufficient drainage measures to manage surface and foul water drainage.
- ii. Divert footpath HEYW16 around the north-east of the site, to ensure a Public Right of Way is maintained.
- iii. Incorporate native tree planting and hedgerow reinforcement around the site's boundaries to improve landscaping.
- iv. Incorporate buffers to hedgerow boundaries to minimise landscape impact from the development.
- v. Secure a financial contribution to the Trowbridge Bat Mitigation Strategy.
- vi. Secure appropriate mitigation in accordance with the Salisbury Plain Special Protection Area Mitigation Strategy.

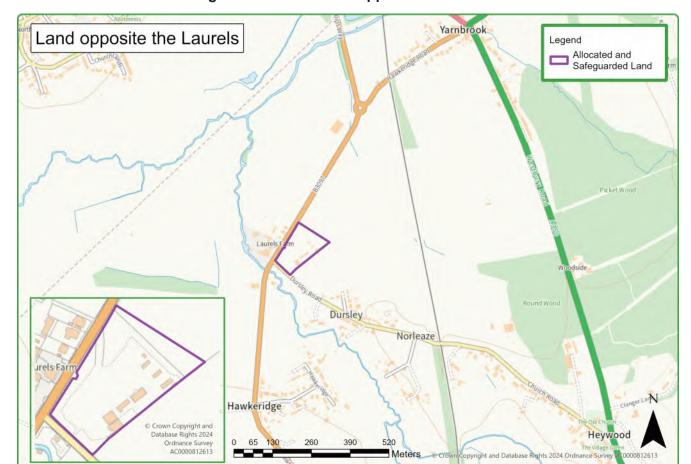


Figure 13: GT16 - Land opposite the Laurels

## Policy GT17: Land adjacent Nursteed Park, Devizes

- 4.70 This site hosts 2 showpeople plots, equipment storage area and vehicle parking and is an established site. There is no planning permission for the existing development, but the site is immune from planning enforcement. The 2024 GTAA identifies a need for 4 additional showpeople plots. In the interest of good planning, planning permission should be sought for a total of 6 plots to regularise the use and accommodate identified need in accordance with Policy GT17 (Land adjacent Nursteed Park).
- **4.71** Improvement to the site access and visibility splay are required and details of vehicle tracking are to be provided as part of a proposal to demonstrate adequate turning facilitie4s within the site.
- 4.72 There is evidence of groundwater flood risk present on site which needs to be addressed in a drainage strategy.
- **4.73** Perimeter planting would improve on-site amenity and of that for adjoining residential properties. The area for storage should be enclosed and separated from the residential area in the interest of amenity and safety.
- **4.74** The site lies in the zone of influence for Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.

#### Land adjacent Nursteed Park

Land adjacent Nursteed Park, as identified on the Policies Map, is allocated for the development of 6 travelling showpeople plots where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Secure visibility splay of 2.4m x 43m at the site access to ensure and maintain highway safety.
- ii. Deliver sufficient drainage measures to manage surface, groundwater and foul water drainage.
- iii. Provide perimeter planting in the interest of protecting amenity both within the site and on neighbouring land uses.
- iv. Secure appropriate mitigation in accordance with the Salisbury Plain Special Protection Area Mitigation Strategy.

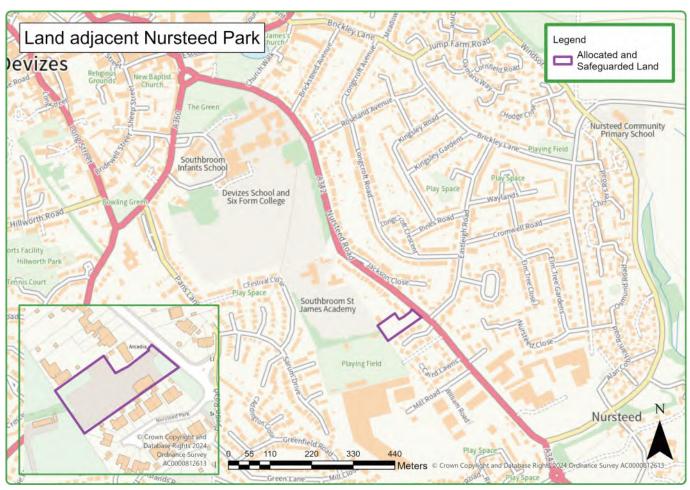


Figure 13: Policy GT17 - Land adjacent Nursteed Park Site Allocation

## Policy GT18: Petersfinger Business Park, Salisbury

- 4.75 This site hosts a lawful plot for showpeople and storage area and is situated in Petersfinger, adjacent to the A36. The 2024 GTAA identifies an accommodation need for a single showpeople plot at this site and there may be accommodation need from teenagers by 2029.
- **4.76** Policy GT18 (Petersfinger Business Park) allocates 1 additional showpeople plot at this site to meet identified need. The additional plot should be accommodated within the existing permitted site to avoid exposure to traffic noise from the adjacent A36.
- **4.77** Additional land is available to accommodate touring caravans to meet identified need from teenagers if required with some reconfiguration of the site.
- 4.78 There is evidence of groundwater flood risk present on site which needs to be addressed in a drainage strategy. Mains water and sewer connections are available but will require capacity assessment by Wessex Water.
- 4.79 The site lies within the River Avon SAC catchment. Appropriate Assessment will be undertaken by the Council following submission of a planning application. Applicants need to follow Wiltshire Council's advice on its website in terms of nutrient neutrality<sup>44</sup>. The site also falls within the zone of influence of New Forest protected sites and mitigation will be required.
- 4.80 The site is located adjacent to the A36. A noise assessment will be required to ascertain if mitigation will be required to ensure acceptable living conditions for site occupants.

## **Policy GT18**

## Petersfinger Business Park

Land at Petersfinger Business Park, as identified on the Policies Map, is allocated for the development of 1 additional travelling showpeople plot where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Secure mitigation measures in accordance with the requirements of the Council's nutrient neutrality strategy.
- ii. Deliver sufficient drainage measures to manage groundwater flood risk and surface and foul water drainage.
- iii. Secure a financial contribution to the New Forest Protected Sites Mitigation Strategy.
- iv. Ensure the delivery of measures to mitigate any identified adverse impacts from noise, including from the A36.

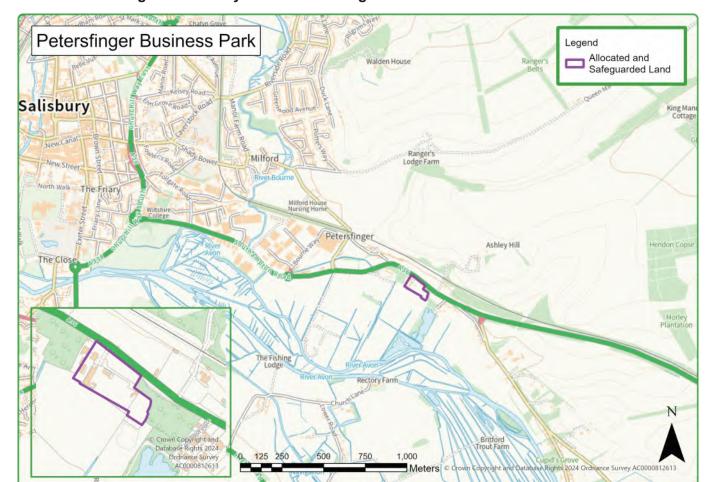


Figure 14: Policy GT18 - Petersfinger Business Park Site Allocation

# Site Allocations to meet pitch needs from households that do not meet the planning definition

## Policy GT19: Former Glenville Nurseries, Royal Wootton Bassett

- 4.81 This site hosts 11 lawful gypsy and traveller pitches and is situated to the south of Royal Wootton Bassett adjacent to Marlborough Road. The GTAA identifies a need for 1 pitch and potentially teenage accommodation by 2029. According to the evidence, need arises on Pitch 7 on this site.
- **4.82** A drainage strategy will need to be submitted setting out how surface water and foul drainage are to be managed.
- **4.83** Policy GT19 (Former Glenville Nurseries) allocates an additional pitch at Pitch 7 on this site. There is some potential for touring caravans to be stationed near the entrance of the pitch.

## Policy GT19

#### Former Glevnille Nurseries

Land at Former Glenville Nurseries, as identified on the Policies Map, is allocated for the development of 1 additional gypsy and traveller pitch by way of subdivision of Pitch 7, where it accords with policies in the development plan. Proposals should comply with the following requirements:

i. Deliver sufficient drainage measures to manage surface and foul water drainage.

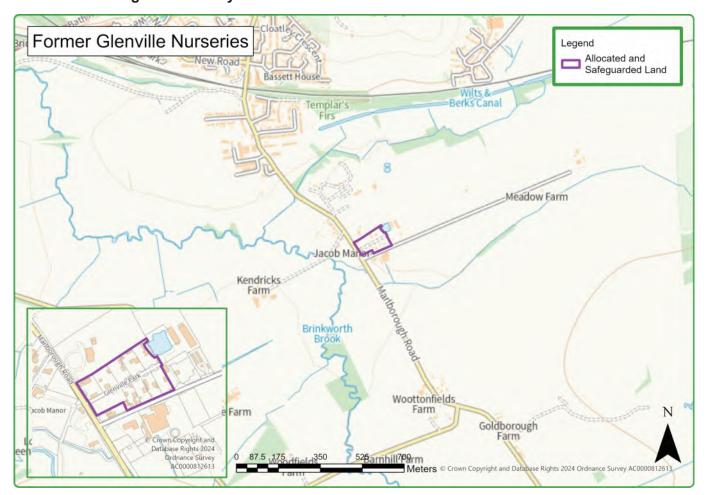


Figure 15: Policy GT19 - Former Glenville Nurseries Site Allocations

## Policy GT20: Greenfield View, Leigh

- 4.84 This site hosts 2 lawful gypsy and traveller pitches and is located between Leigh and Upper Chelworth Lodge. The GTAA identifies a need for 1 pitch. There may also be an accommodation need from teenagers.
- **4.85** Policy GT20 (Greenfield View, Leigh) allocates a single pitch at this site. It is considered that there would be additional space to accommodate touring caravans at this site by 2029 if required to meet teenagers accommodation needs.
- **4.86** The site lies within 2.5km from North Meadow and Clattinger Farm SAC. A payment will be required towards the North Meadows and Clattinger Farm SAC Mitigation Strategy before commencement of development to mitigate for increase in visitor numbers to that area.
- **4.87** Foul drainage should be achieved by way of private sewage treatment plant in the absence of available sewer connections.
- **4.88** Existing boundary trees and vegetation should be retained and managed in perpetuity.
- **4.89** Potential effects from proximity to a working farm to the south-east should be further assessed in terms of noise, odour and pests. A contaminated land assessment is required to establish any mitigation that may be required due to the potential for previous agricultural or mechanical land use.

## **Policy GT20**

## Greenfield View, Leigh

Land at Greenfield View, as identified on the Policies Map, is allocated for the development of 1 additional gypsy and traveller pitch where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Deliver sufficient drainage measures to manage surface water and foul water drainage.
- ii. Secure the retention and future management of the existing boundary trees and vegetation.
- iii. Prevent unacceptable risk to future occupiers from pollution by securing the implementation of remediation measures, as necessary.
- iv. Secure a financial contribution to the North Meadow and Clattinger Farm SAC Mitigation Strategy.



Figure 16: Policy GT20 - Greenfield View Site Allocation

## Policy GT21: Land at Capps Lane, Bratton

- **4.90** This lawful traveller site has planning permission for 1 pitch is situated on Capps Lane outside the village of Bratton. The GTAA identifies an accommodation need of 1 pitch at this site.
- 4.91 Policy GT21 (Land at Capps Lane) allocates this site for 1 pitch. Highway and access improvements will be required due to the narrow highway in this location and to ensure adequate turning facilities in the site. A package treatment plant is the preferred option for foul drainage management. Any loss of vegetation should be compensated for through the Council's offsetting scheme. Buffers should be provided around the proposed development and the road frontage hedgerow retained and managed in perpetuity.
- 4.92 The site lies within the grey zone of the Trowbridge Bat Mitigation Strategy. Financial contributions will be required. The site also lies in the zone of influence for Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.

#### Land at Capps Lane

Land at Capps Lane, as identified on the Policies Map, is allocated for the development of 1 additional gypsy and traveller pitch where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Incorporating a passing bay scheme on land in ownership of the applicant and demonstrate vehicle tracking.
- ii. Secure the retention and future management of the hedgerow along the road frontage.
- iii. Incorporate buffers to hedgerows around the proposed pitch.
- iv. Secure a financial contribution to the Trowbridge Bat Mitigation Strategy.
- v. Secure appropriate mitigation in accordance with the Salisbury Plain Special Protection Area Mitigation Strategy.

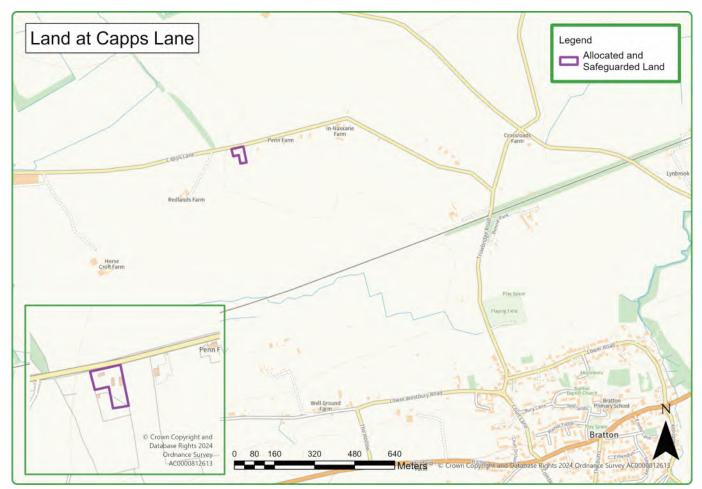


Figure 17: Policy GT21 - Land at Capps Lane Site Allocation

#### Policy GT22: Melbourne View, Brinkworth

- 4.93 This site hosts 4 lawful pitches and additional touring caravans for storage and is situated between Brinkworth and Little Somerford along the B4042. The GTAA evidences a need for 3 additional pitches at this site; and there may be accommodation need from teenagers by 2029. 1 pitch can be accommodated in view of the densely developed nature of the site. Accordingly, Policy GT22 (Melbourne View) allocates 1 additional pitch at this site.
- **4.94** The site has permission for the storage of touring caravans but planning conditions require that they cannot be lived in. There may therefore be potential to provide for teenagers subject to the appropriate consents.
- **4.95** In the absence of available mains sewer, a package treatment plant is required.
- 4.96 The site sits above a historic landfill site. The original planning permission dates back to 2004 and subsequent permissions only relate to the increase in the number of caravans to be stationed on site. Ground investigations are required in accordance with the Council's adopted Contaminated Land Supplementary Planning Document (2012) and the adopted Contaminated Land Strategy<sup>45</sup> to consider the need for remediation measures.
- **4.97** In biodiversity terms a buffer to the site's northern boundary shrub and tree habitat should be maintained. The site lies in a risk zone for great crested newts, but impacts can be avoided if development is restricted to hardstanding areas.

## **Policy GT22**

#### Melbourne View

Land at Melbourne View, as identified on the Policies Map, is allocated for the development of 1 additional pitch where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Deliver sufficient drainage measures to manage surface and foul water drainage.
- ii. Secure a buffer to priority shrub and tree habitat on the northern site boundary, to maintain ecological value.
- iii. Prevent unacceptable risk to future occupiers from pollution by securing the implementation of remediation measures, as necessary.

Melbourne View

Cleverton

Malthouse Gottage/Farm

Cottage

Legend

Allocated and Safeguarded Land

Weeks Farm

Weeks Farm

Lodge Farm
Cottage

N

Lodge Farm
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Figure 18: Policy GT22 - Melbourne View Site Allocation

## Policy GT23: 79 Southampton Road, near Alderbury

- 4.98 This gypsy and traveller site hosts 2 lawful single dwellings and mobile homes, and is situated between Salisbury and Alderbury. The 2024 GTAA identifies a need for an additional 2 pitches. There is also evidence that teenage children may require accommodation by 2029.
- **4.99** Accordingly, Policy GT23 (79 Southampton Road) identifies 2 additional pitches. There is sufficient room available on the site for the accommodation of additional tourers if required.
- **4.100** The site lies within the River Avon SAC catchment. An Appropriate Assessment will be undertaken by the Council following submission of a planning application in accordance with the Habitats Regulations. Applicants need to follow Wiltshire Council's advice on its website in terms of nutrient neutrality<sup>46</sup>.
- **4.101** The site is within the catchment of the Petersfinger Sewage Treatment Works and mains connection for foul drainage which is available is recommended to achieve phosphate neutrality.
- **4.102** The site also falls within the zone of influence of New Forest protected sites and mitigation will be required.
- **4.103** There is evidence of groundwater flood risk present on site, and this should be investigated further in the drainage strategy.

https://www.wiltshire.gov.uk/article/Phosphorus-and-nitrogen-mitigation Page 446

- **4.104** The site is in an area populated by cropmarks of ancient field systems and with recorded evidence for later prehistoric, Roman and Saxon settlement and funerary evidence which requires monitoring of preparatory groundworks.
- 4.105 The proposal should be informed by a heritage impact assessment to establish the impact of the development on Belmont House (Grade II listed building) and its setting. The assessment should include consideration of the impact during winter months when trees are not in leaf and identify mitigation measures as required to conserve the designated heritage asset.
- **4.106** A 15–20-metre buffer to mature trees on the south-western boundary will be required.

## 79 Southampton Road

Land at 79 Southampton Road, as identified on the Policies Map, is allocated for the development of 2 additional pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Secure mitigation measures in accordance with the requirements of the Council's nutrient neutrality strategy.
- ii. Provide sufficient drainage measures to manage groundwater flood risk and surface and foul water drainage. Mains sewer connection will be required.
- iii. Ensure the conservation of designated heritage assets and their setting, including Belmont House Grade II Listed Building.
- iv. Ensure archaeological monitoring and recording during construction to protect potential sub-surface heritage assets.
- v. Provide a 15-20 metre buffer to mature trees on the southwestern site boundary, to mitigate for landscape impacts from the development.
- vi. Secure a financial contribution to the New Forest Protected Sites Mitigation Strategy.

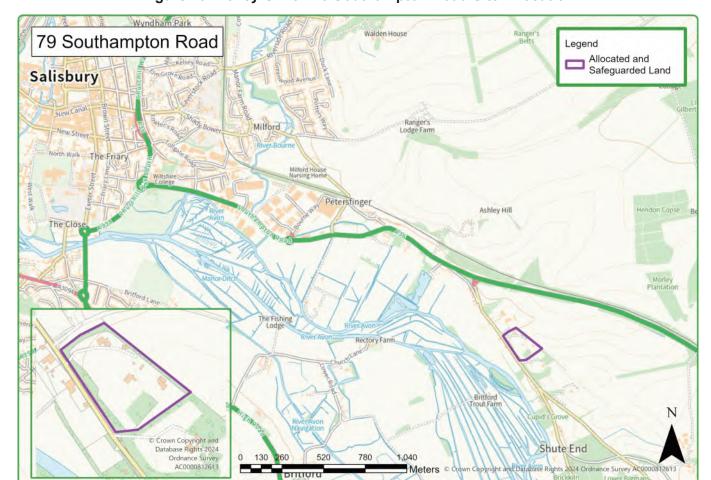


Figure 19: Policy GT23 - 79 Southampton Road Site Allocation

## **New Site Allocations**

**4.107** In accordance with Policy GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople) new sites are allocated to meet identified need for gypsy and traveller households that meet the planning definition.

## Policy GT24: Bushton North Farm, Breach Lane, Bushton

- **4.108** This site is located at the western edge of a field which is in agricultural use and is allocated for 3 gypsy and traveller pitches. Access would be gained from Breach Lane using an existing gated field access which requires upgrading.
- **4.109** Due to the ecological sensitivity of the site, no more than 3 permanent gypsy and traveller pitches will be supported. The site can enable off-grid power supply and off-grid foul drainage. Existing hedgerows and trees around the site must be protected and enhanced, and a new hedgerow will be required on the site's eastern boundary to assimilate the development. The site falls within a high- risk zone for great crested newts. An assessment should be undertaken to confirm the likelihood of, or presence of great crested newts and any measures required to mitigate the impact of the development on great crested newts and their habitat should be identified and secured.
- 4.110 Only a small part of the site should be developed for the 3 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT24 (Bushton Farm North) including amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

# **Policy GT24**

#### **Bushton North Farm**

Land at Bushton North Farm, as shown on the Policies Map, is allocated for the development of no more than 3 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Improve the existing access with a 2.4m x 215m visibility splay, set back by 2.4m from the carriageway to ensure highway safety when accessing and egressing the site.
- iii. Provide sufficient drainage measures to manage surface and foul water drainage.
- iv. Ensure connection to mains water is provided for the development.
- v. Ensure electricity supply to the development is provided by on-site renewable energy sources.
- vi. Provide a 10-metre buffer to existing on-site hedgerows and trees to mitigate the landscape impact from the development.
- vii. Provide a new hedgerow along the open eastern boundary of the site to mitigate the landscape impact of the development.
- viii. Secure appropriate mitigation for protected species, including great crested newts, as required.



Figure 20: Policy GT24 - Bushton North Farm Site Allocation

## Policy GT25: Land at Housecroft Farm 1, Bratton Road, Edington

- **4.111** This site forms part of the Housecroft Farm estate and is situated adjacent to Bratton Road. Given the exposed location of the site only a small development of 2 gypsy and traveller pitches can be supported and the layout must ensure that.
- **4.112** An existing field access can be utilised and improved. A mains water connection can be achieved. Foul water management is to be achieved by off-grid package treatment. In the absence of mains power renewable or low carbon power supply is preferred.
- **4.113** On-site features such as hedgerows must be retained and protected through appropriate standoffs and avoidance of external lighting. New native hedgerow planting will be required around the site.
- **4.114** Financial contributions to the Trowbridge Bat Mitigation Strategy will be required. The site also lies in the zone of influence for Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.
- 4.115 Only a small part of the site should be developed for the 2 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT25 (Land at Housecroft Farm (1)) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## Land at Housecroft Farm (1)

Land at Housecroft Farm, as shown on the Policies Map, is allocated for the development of no more than 2 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide vehicular site access to be set 2.4m back from the carriageway with 160m visibility in both directions.
- iii. On-site renewables should be installed to supply electricity to the development.
- iv. Provide sufficient drainage measures to manage surface and foul water drainage.
- v. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements.
- vi. Provide new characteristic native hedge field boundary to the north, and provide new hedgerow trees on all boundaries, to minimise landscape impact from the development.
- vii. Secure the retention and protection of existing hedgerows on the east, west and southern boundaries with a 10-metre wide habitat buffer, to minimise landscape impact from the development.
- viii. Secure a financial contribution to the Trowbridge Bat Mitigation Strategy.
- ix. Secure appropriate mitigation in accordance with the Salisbury Plain Special Protection Area Mitigation Strategy.



Figure 21: Policy GT25 - Housecroft Farm 1 Site Allocation

## Policy GT26: Land at Housecroft Farm (2), Edington Road, Edington

- **4.116** The site forms part of the Housecroft Farm estate and is situated at its eastern end along Edington Road. The site is exposed and for this reason only a small development of 2 gypsy and traveller pitches can be supported.
- **4.117** An existing field access can be utilised and improved. Vehicle tracking information should be submitted with an application to demonstrate turning facilities within the site. A mains connection can be achieved.
- **4.118** Foul water management is to be achieved by off-grid package treatment. In the absence of mains electricity supply being achievable, a renewable or low carbon power supply is preferred.
- **4.119** On-site features such as hedgerows must be retained and protected through appropriate standoffs and avoidance of external lighting. New native hedgerow planting will be required around the site.
- **4.120** Financial contributions to the Trowbridge Bat Mitigation Strategy will be required. The site also lies in the zone of influence for Salisbury Plain SPA. The current mitigation strategy for the SPA has financial mechanisms in place.
- 4.121 Only a small part of the site should be developed for the 2 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT26 (Land at Housecroft Farm (2)) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## Land at Housecroft Farm (2) Edington Road, Edington

Land at Housecroft Farm, as shown on the Policies Map, is allocated for the development of no more than 2 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide vehicular site access to be set 2.4m back from the carriageway with 160-215m visibility in both directions to ensure highway safety when accessing and egressing the site.
- iii. Ensure electricity supply to the development is provided by on-site renewable energy sources where connection to mains electricity supply cannot be achieved.
- iv. Provide sufficient drainage measures to manage surface and foul water drainage.
- v. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements.
- vi. Provide new characteristic native hedge field boundary to the north and west, and provide new hedgerow trees on all boundaries to minimise landscape impact from the development.
- vii. Ensure the retention and protection of existing hedgerows on the east, west and southern boundaries with a 10-metre-wide habitat buffer to minimise landscape impact from the development.
- viii. Secure a financial contribution to the Trowbridge Bat Mitigation Strategy.
- ix. Secure appropriate mitigation in accordance with the Salisbury Plain Special Protection Area Mitigation Strategy.



Figure 26: Policy GT26 - Housecroft Farm 2 Site Allocation

## Policy GT27: Land at Cleverton, Cleverton

- **4.122** The site lies adjacent to the B4042 between Little Somerford and Malmesbury and is in agricultural use. The site is suitable for the allocation and development of 10 gypsy and traveller pitches.
- **4.123** The site benefits from an existing agricultural access onto the B4042 and mains connection for water and power. A flood risk assessment will be required. There is evidence of groundwater and surface water flood risk to be further addressed in the drainage strategy.
- **4.124** Existing hedgerows should be supplemented with new higher planting. New woodland and tree planting would be required within the site. Adequate separation distances to nearby residential properties are also required to safeguard residential amenity.
- **4.125** The grassland quality must be established prior to development to assess the ecological impact of the development and inform compensation requirements. The southern and western hedgerows are of high biodiversity value and should be protected and improved.
- **4.126** An assessment should be undertaken to confirm the likelihood of, or presence of great crested newts and any measures required to mitigate the impact of the development on great crested newts and their habitat should be identified and secured.
- **4.127** There is potential within the site for archaeological features. Further investigation is required, including a geophysical site survey and trial trench evaluation to identify any heritage assets and assess the impact of the inform a development proposal and inform mitigation measures, as necessary.

4.128 Only a part of the site should be developed for the 10 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT27 (Land at Cleverton, Cleverton) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## **Policy GT27**

#### Land at Cleverton, Cleverton

Land at Cleverton, as shown on the Policies Map, is allocated for the development of 10 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide vehicular site access to be set 2.4m back from the carriageway with 160m visibility in both directions, to ensure highway safety when accessing and egressing the site.
- iii. Provide connections to mains electricity and water.
- iv. Ensure any risk of flooding is mitigated.
- v. Provide sufficient drainage measures to manage surface, groundwater and foul water drainage.
- vi. Secure ecological mitigation and compensation measures as required, to protect grassland habitat and hedgerows.
- vii. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements.
- viii. Enhance existing hedgerows fronting the B4042 with new, higher planting.
- ix. Secure the retention and protection of the southern hedgerow, the provision of a 15-metre grassland corridor intermixed with new hedgerow planting and the provision of adequate protective fencing.
- x. Provide a 5-metre buffer to the western hedgerow.
- xi. Secure appropriate mitigation for protected species, including great crested newts, as required.
- xii. Provide new woodland and tree planting within the site to mitigate for landscape impacts from the development.
- xiii. Securing suitable separation distances to neighbouring residential properties, in the interest of safeguarding amenity of future residents of the site and neighbouring residents.
- xiv. Avoid illumination of southern and western boundaries by external lighting.
- xv. Ensure that any identified heritage assets are conserved with mitigation measures secured, where necessary.



Figure 23: Policy GT27 - Land at Cleverton Site Allocation

## Policy GT28: Land at Oxhouse Farm, Rowde

- **4.129** The site lies adjacent to Devizes Road to the east of Rowde and is in agricultural use. It is suitable for the allocation and development of 10 gypsy and traveller pitches.
- **4.130** The site benefits from an existing agricultural access onto Devizes Road and mains connection for water and power can be achieved.
- **4.131** On-site features such as field ditches and existing hedgerows must be retained and protected through appropriate standoffs, fencing and avoidance of external lighting. New native hedgerow planting will be required around the site. Woodland planting within and on the corners of the site will assist in its assimilation into the countryside.
- **4.132** The site may contain archaeological features and provide for ground nesting birds. Investigatory surveys will be required to establish the presence and extent of such features, and how to mitigate for impact on these.
- 4.133 Only a part of the site should be developed for the 10 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT28 (Land at Oxhouse Farm, Rowde) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

#### Land at Oxhouse Farm, Rowde

Land at Oxhouse Farm, as shown on the Policies Map, is allocated for the development of 10 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide vehicular site access to be set 2.4m back from the carriageway with 43m visibility in both directions, to ensure highway safety when accessing and egressing the site.
- iii. Provide connections to mains electricity and water.
- iv. Provide sufficient drainage measures to manage surface and foul water drainage.
- v. Provide new hedgerow and tree planting along site boundaries.
- vi. Provide a 15-metre wide buffer with new hedgerow planting to western boundary and stream, to be protected by substantial fencing.
- vii. Provide new woodland and tree planting within the site and its corners to mitigate for landscape impacts from the development.
- viii. Avoid illumination of western boundary by external lighting to protect boundary habitats.
- ix. Ensure that any identified heritage assets are conserved with mitigation measures secured, where necessary.
- Submission of ground nesting birds survey.



Figure 24: Policy GT28 - Oxhouse Farm Site Allocation

## Policy GT29: Land at Upper Seagry Farm, Upper Seagry

- **4.134** The site lies adjacent to Startley Road to the north of Upper Seagry and is in agricultural use. It is suitable for the allocation and development of 5 gypsy and traveller pitches.
- **4.135** The site benefits from an existing field access and mains connection for water and power could be achieved. If a foul sewer connection is considered this will be 300m away and may require a pumping station to secure outfall. There is evidence of high groundwater which would need to be investigated further in the drainage strategy.
- 4.136 On-site hedgerows and trees must be retained and protected through appropriate standoffs. New native hedgerow planting will be required along the southern and eastern boundary. The presence of great crested newts must be investigated through a survey and any required mitigation identified and secured.
- 4.137 Only a part of the site should be developed for the 5 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT29 (Land at Upper Seagry Farm, Upper Seagry) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## Land at Upper Seagry Farm, Upper Seagry

Land at Upper Seagry Farm, as shown on the Policies Map, is allocated for the development of 5 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide new vehicular site access to be set 2.4m back from the carriageway with 215m visibility to the north and at least 90m to the south, to ensure highway safety when accessing and egressing the site.
- iii. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements.
- iv. Provide connections to mains electricity and water.
- Provide sufficient drainage measures to manage surface water, groundwater and foul water drainage.
- vi. New hedgerow and tree planting along southern and eastern boundaries
- vii. Provide 20-metre and 10-metre wide buffers to the northern and western hedgerow boundaries respectively, to mitigate for landscape impacts from the development.
- viii. Secure appropriate mitigation for protected species, including great crested newts, as required.

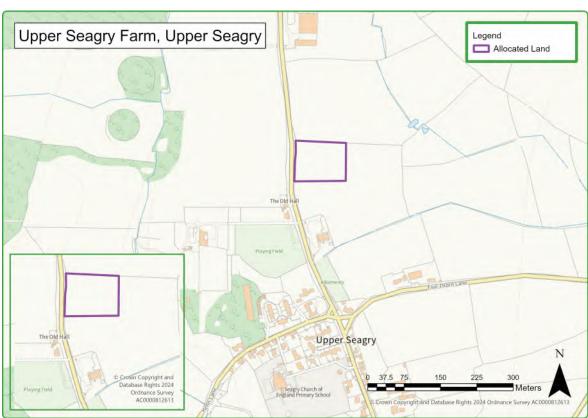


Figure 25: Policy GT29 - Upper eagry Farm Site Allocation

#### Policy GT30: Land at Whistley Road, Potterne

- **4.138** This site lies adjacent to Whistley Road just outside Potterne. The site is suitable for the development of 2 pitches.
- 4.139 The site benefits from an existing field access which needs to be improved and any hedgerow removed must be replanted on an adjusted alignment. Mains connections can be achieved. There is evidence of ground instability which would need to be investigated further in a ground investigation report.
- **4.140** A drainage strategy should determine appropriate surface water drainage solutions.
- **4.141** New native hedgerow boundaries and trees are required to screen the site from neighbouring properties and rights of way and integrate it into the open countryside.
- **4.142** On-site hedgerows must be protected by buffers and from external lighting.
- 4.143 Only a part of the site should be developed for the 2 pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT30 (Land at Whistley Road, Potterne) and amenity space for residents. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## **Policy GT30**

#### Land at Whistley Road, Potterene

Land at Whistley Road, as shown on the Policies Map, is allocated for the development of no more than 2 gypsy and traveller pitches where it accords with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide a vehicular site access to achieve 2m x 90m visibility splay, to ensure highway safety when accessing and egressing the site.
- iii. Replace hedgerow on new alignment fronting the road if required.
- iv. Deliver connections to mains electricity and water.
- v. Ensure the necessary remediation measures are undertaken to address any identified ground stability issues.
- vi. Provide sufficient drainage measures to manage surface and foul water drainage.
- vii. Provide new hedgerow and tree planting around the site.
- viii. Provide a 5-metre buffer from the centreline of roadside hedgerow and 5-metre buffers from the outer limit of western and eastern hedgerows.
- ix. Avoid illumination of hedgerow boundaries by external lighting to protect boundary habitat.

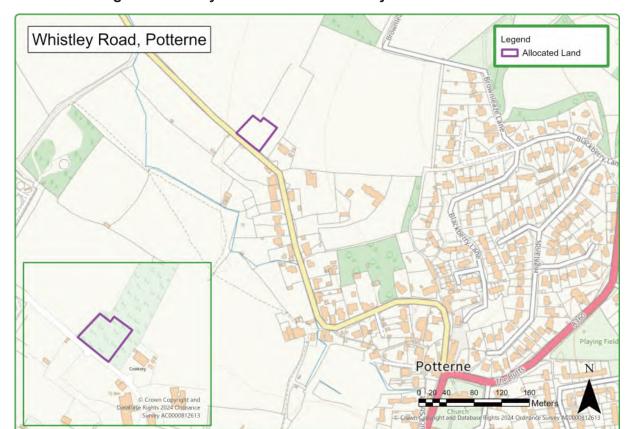


Figure 26: Policy GT30 - Land at Whistley Road Site Allocation

# **Emergency Stopping Site**

## Policy GT31: Land at Thickthorn Farm, Preston Lane, Lyneham

- **4.144** The proposed site lies approx. 300m to the west of Thickthorn Cottages adjacent to Preston Lane. An emergency stopping site is proposed for 6 pitches and basic facilities in accordance with Policy GT5 (Emergency Stopping Sites).
- **4.145** Access improvements and a drainage strategy will be required. There is evidence of medium/high groundwater risk. Off-site watercourses could be utilised if acceptable.
- **4.146** Appropriate standoffs to on-site hedgerows and new hedgerows and tree/copse will be required.
- 4.147 Only a part of the site should be developed for the 6 emergency stopping pitches with part of the site being undeveloped and used for mitigation as listed in Policy GT31 (Land at Thickthorn Farm, Preston Lane, Lyneham) and amenity space. It is important that proposals demonstrate the most efficient use of land by delivering a satisfactory layout that does not occupy more land within the allocation than is required. This will ensure the retention of greenfield land as far as practicable and avoid unnecessary encroachment into the countryside.

## **Policy GT31**

#### Land at Thickthorn Farm, Preston Lane, Lyneham

Proposals for an emergency stopping site with 6 pitches as shown on the policies map will be supported where they accord with policies in the development plan. Proposals should comply with the following requirements:

- i. Delivers a layout that demonstrates the most efficient use of land and retains greenfield land within the site as far as practicable.
- ii. Provide access visibility splays of 2.4m x 215 (right) and 180m (left) to ensure highway safety when accessing and egressing the site.
- iii. Provide sufficient drainage measures to manage surface water and groundwater.
- iv. Provide additional hedgerows including hedgerow trees on the open eastern and southern site boundaries, and additional tree/copse planting in the northwestern field corner to mitigate landscape impacts from the development.
- v. Incorporate a 10-metre buffer to ensure the retention and protection of existing hedgerows within the site.



Figure 27: Policy GT31 - Thickthorn Farm Site Allocation

# 5 Monitoring and Implementation

- 5.1 The Monitoring Framework serves to monitor the effectiveness of the Plan, and to assemble evidence that can inform its review, including the Gypsy and Traveller Accommodation Assessment. It sets out how the delivery of each policy will be monitored. Policies deliver against the plan objectives in Section 2.
- Monitoring activity will identify net additional provision. This covers gains of new pitches and plots, and losses of pitches or plots, or redevelopment of sites that have been permanently vacated. Identifying whether permissions which result in a gain or loss of pitches or plots have been implemented, will be carried out through the bi-annual surveying activity required for the Traveller Caravan Count. This will be reported through an annual update of the Council's 5 year land supply, and periodically through the authority monitoring report.
- **5.3** A non-exhaustive list of information to inform monitoring of the Plan is shown below:

#### Table 9: Non-exhaustive list of information to inform monitoring of the Plan

- i. Planning application reference.
- ii. Registration date.
- iii. Site address.
- iv. Description of development.
- v. Pitches or plots proposed to be gained.
- vi. Pitches or plots proposed to be lost.
- vii. Number of static caravans to be provided.
- viii. Number of mobile caravans to be provided.
- ix. Number of touring caravans to be provided.
- x. Categorisation: gypsy and travellers / showpeople site; meets or does not meet PPTS Annex 1 definition; allocation; intensification; windfall.
- xi. Planning application / planning appeal status and decision date
- xii. Length of permission permanent or temporary.
- xiii. Conditions of permission (e.g. personal, no. of caravans/pitches).
- xiv. Completion date.
- 5.4 The Plan policies will operate to achieve the objectives set out in Chapter 2 of the Plan. Each objective will be monitored against performance indicators, and the progress towards delivering that objective in the plan period. Each objective will be monitored periodically according to the frequency of activity that helps deliver that objective. Each objective will be monitored and an assessment made of whether the policy is proving effective. Where indicators show a policy is not performing as anticipated, or negative effects against meeting an objective are occurring, then this may indicate intervention is required.

#### Table 10: Objective 1

Objective 1: To meet identified accommodation needs for gypsy and traveller pitches and travelling showpeople plots to 2038 through site allocations, broad locations for growth and a policy framework for assessing proposals.

**Policies required to deliver the objective:** GT1 ((Meeting the needs of gypsies and travellers, and travelling showpeople), GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites), GT3 (New sites and intensification of existing sites), GT6 (Braemar and Braemar (2)) to GT18 (Petersfinger Business Park, Salisbury), GT24 (Bushton North Farm,) to GT30 (Land at Whistley Road, Potterne).

#### Performance indicators:

- i. Approved permissions on allocated sites
- ii. Implemented permissions on allocated sites.
- iii. Approved permissions which meet accommodation needs which are not being met through new allocated sites or sites allocated for intensification, including locating additional touring caravans to meet identified need.
- iv. Implemented permissions which meet accommodation needs which are not being met through new allocated sites or sites allocated for intensification, including locating additional touring caravans to meet identified need.
- v. Losses of existing gypsy and traveller sites or travelling showpeople sites for other land uses.

#### Assessment against performance indicators:

Objective met / Objective on course to be met / No progress towards meeting objective / Negative or detrimental effects against the objective.

Frequency of review: Annually

#### Table 11: Objective 2

Objective 2: To make provision for 3 council-managed emergency stopping places to provide temporary accommodation.

**Policies required to deliver the objective:** GT1 (Meeting the needs of gypsies and travellers, and travelling showpeople), GT5 (Emergency Stopping Sites), GT31 (Land at Thickthorn Farm, Preston Lane, Lyneham).

#### **Performance indicators:**

- i. Identification of suitable sites within the broad locations identified on the Key Diagram (Figure 1).
- ii. Approved permissions on suitable sites.
- iii. Implemented permissions on suitable sites.

#### **Assessment against performance indicators:**

Objective met / Objective on course to be met / No progress towards meeting objective / Negative or detrimental effects against the objective.

Frequency of review: Annually

# **Appendix 1 - Glossary**

#### **Appropriate Assessment:**

Forms part of the Habitat Regulations Assessment (see below). Must be applied by the local authority in plan-making and at planning application stage, if there is a risk of a likely significant effect on the integrity of a European Site(s) or there is not enough evidence to rule out a risk.

#### **Broad Locations for Growth:**

Where additional development to meet need is considered possible, but the specific number of new pitches or plots cannot yet be identified.

#### **Certificate of Lawfulness (or Lawful Development Certificate):**

There are 2 types of lawful development certificate. A local planning authority can grant a certificate confirming that: (a) an existing use of land, or some operational development, or some activity being carried out in breach of a planning condition, is lawful for planning purposes under section 191 of the Town and Country Planning Act 1990; or (b) a proposed use of buildings or other land, or some operations proposed to be carried out in, on, over or under land, would be lawful for planning purposes under section 192 of the Town and Country Planning Act 1990.

#### Dayroom:

Also referred to as an amenity building in the context of traveller sites. Often brick-built and includes basic amenities for travellers, including a toilet, kitchen/food preparation area, and washing facilities/showers. Can include a small dining area.

#### **Deliverable Sites:**

To be considered deliverable, sites should be available now, offer a suitable location for development, and be achievable with a realistic prospect that development will be delivered on the site within 5 years. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within 5 years, for example they will not be viable, there is no longer a demand for the type of units or sites have long-term phasing plans.

#### **Developable Sites:**

To be considered developable, sites should be in a suitable location for traveller site development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

#### **Development Plan Document:**

Part of the suite of planning documents that make up the development plan for the local authority area as defined in planning legislation.

#### **Drainage Strategy:**

A strategy submitted alongside a planning application that sets out how surface water and/or groundwater will be managed on site.

#### **Equality Act:**

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. Romany Gypsies, Irish Travellers, Scottish Travellers and Roma are protected against race discrimination under the Act.

#### **Emergency Stopping Site:**

A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.

#### **Geophysical Site Survey:**

Provides a non-intrusive method for assessing the archaeological potential of sites.

#### **Green Belt:**

Land use designation. Used to prevent urban sprawl by keeping land permanently "open" around urban areas.

#### **Gypsies and Travellers:**

A range of groups with different histories, cultures and beliefs, including Romany Gypsies, Welsh Gypsies, Scottish Gypsy Travellers, Roma, and Irish Travellers. For the purpose of planning, gypsies and travellers are defined by Planning Policy for Traveller Sites (2023) as 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'.

#### **Gypsy and Traveller Accommodation Assessment:**

Identifies the current and future need for gypsy, traveller and travelling showpeople accommodation.

#### **Habitat Regulations Assessment:**

The Conservation of Habitats and Species Regulations 2017 as amended (known as the Habitats Regulations) require that local authorities must carry out an assessment under the Habitats Regulations, known as a Habitats Regulations Assessment (HRA), to test if a plan or project proposal could significantly harm the designated features of a European site.

#### International, national and locally designated sites of importance for biodiversity:

All internationally important sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites), national sites (Sites of Special Scientific Interest (SSSI) and locally designated sites including Local Wildlife Sites.

#### National Landscape (formerly Area of Outstanding Natural Beauty):

Land use designation. Used to conserve natural areas of particular value.

#### **National Planning Policy Framework:**

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied.

#### **Nutrient Neutrality:**

Natural England describes this as a means of ensuring that a development plan or project does not add to existing nutrient burdens within catchments, so there is no net increase in nutrients as a result of the plan or project. In Wiltshire, development in the River Avon and River Test catchments must not result in net increase in nutrients (phosphorous and nitrogen respectively). Package Treatment Plant: Also referred to as Small Sewage Treatment Plant - a system that treats the liquid so it is clean enough to go into the ground or a surface water.

#### Pitch:

Residential pitch for gypsies and travellers. Commonly a pitch accommodates a single household and consists of a static caravan, a dayroom (see above), and space for stationing of a touring caravan, car parking and garden/play area.

#### Plot:

Occupied by travelling showpeople. A plot commonly includes residential accommodation in the form of a static caravan and/or touring caravan, and has capacity for storage and maintenance of equipment such as fairs and rides.

#### Planning condition:

Can be used by the local planning authority as part of planning permission to manage the use of the site. Planning conditions can enhance the quality of development and enable development to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects.

#### **Planning Policy for Traveller Sites:**

This document sets out the Government's Planning Policy for Traveller Sites which should be read in conjunction with the National Planning Policy Framework.

#### Renewable and low carbon energy:

Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

#### **Statement of Community Involvement:**

A document that is legally required by the Planning and Compulsory Purchase Act 2004 and to be maintained by local planning authorities. It sets out how the local planning authority engages with local communities and stakeholders on planning matters including both plan-making and decision-taking.

#### **Transport Statement:**

Assesses the potential transport impacts of development and may propose mitigation measures to promote sustainable development. Proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts).

#### **Travelling Showpeople:**

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently but excludes Gypsies and Travellers.

#### **Unauthorised development:**

The carrying out of development without the required planning permission; or failing to comply with any planning condition (see above) or limitation subject to which planning permission has been granted.

#### Windfall Site:

Sites that are not specifically identified in the development plan.

#### Yard:

Collection of plots exclusively occupied by travelling showpeople.

# **Appendix 2 - Changes to Policies Map - Safeguarded Sites** identified in Policy GT2

This appendix consists of a series of maps showing the sites safeguarded under Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites). The site boundaries are shown in blue. In figures 28, 29, 48, 50, 51, 57 and 58 the administrative boundary between Wiltshire and neighbouring local authorities are shown as a black line.

Figure 28: Bournelake, Greenfield View, Hicks Leaze, The Lodge (Calcutt),



Figure 29: Land adjoining Swindon & Cricklade Railway



Today's Farm

Colle's Farm

Sambourne Park

Willow Farm

Land adjacent B4040

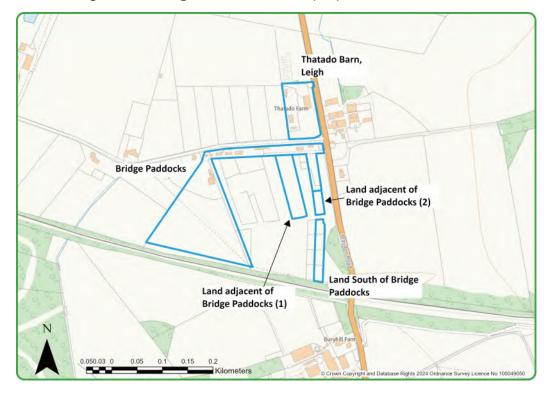
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Figure 30: Sambourne Park, and Land adjacent B4040

Figure 31: Bridge Paddocks sites (x 4), and Thatado Farm



Hildrop Farm

The Firs.

Flan Farm

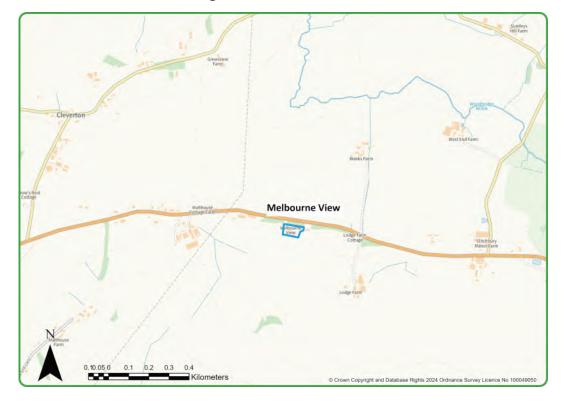
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Abbied Co

Figure 32: Purdys Farm, Land at Four Oaks, and The Paddock (Hook)





Crew's House

Olivemead Farm

Olivemead Farm

Lake View House

Daunstey Brook

Seel's Farm

Seel's Farm

Olivemead Farm

Creat Wood

Hunters Hall

N

Seel's Farm

Creat Wood

Oreat Wood

Figure 34: Land South of Old Farm, Grittenham

Figure 35: Rose Field Caravan Site and The Paddock (Startley)

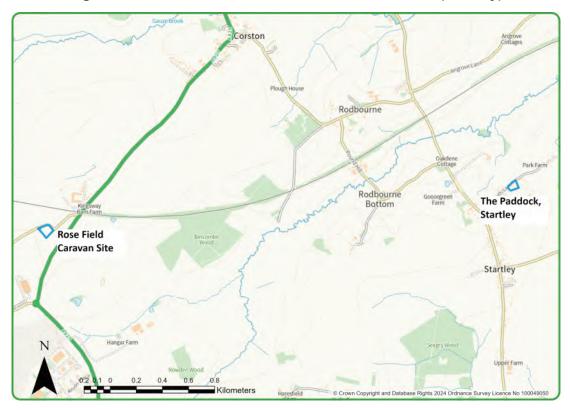


Figure 36: Land adjacent Old Telephone Exchange, Frampton Farm, and Land at Orchard Paddock



Figure 37: Land west of Bushton Road and Brewers Pit (Hilmarton)

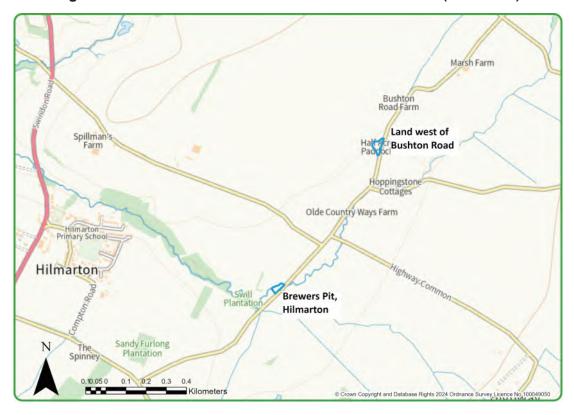


Figure 38: Christian Place



Figure 39: Pudding Brook, Thingley Gypsy site, and Easton Lane Gypsy and Traveller site



Achen Copse

Id Wood

Foxbury Copse

Short Cak
Copse

Short Cak
Copse

Chalk Pit
Cottage

Weinham Farm

The Byti Specks Caravan Site

Keepence
Copse
Copse
Stone's Wood

Furne Coppice

Clench Common
Furne Coppice

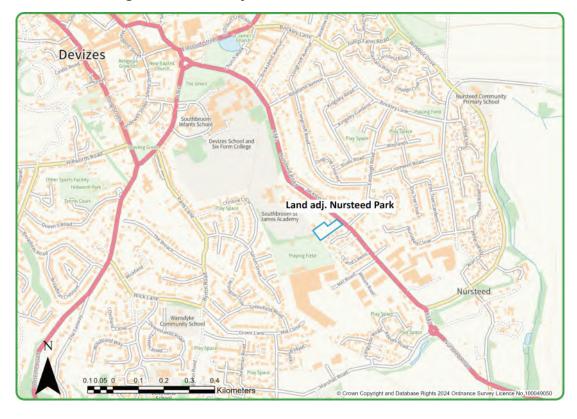
Culley's Farm

Overton
Health Farm

Overton
Heal

Figure 40: Specks Caravan Site

Figure 41: Land adjacent to Nursteed Park, Devizes



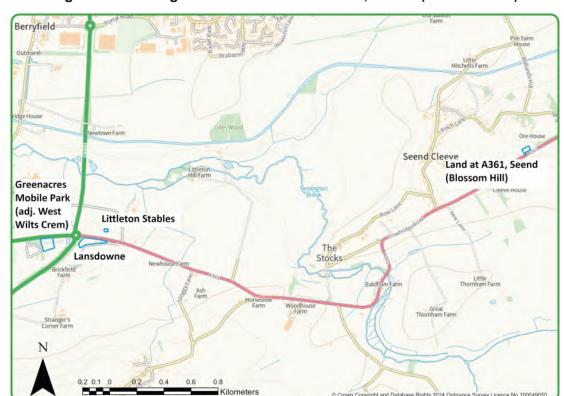


Figure 42: Semington sites and Land at A361, Seend (Blossom Hill)



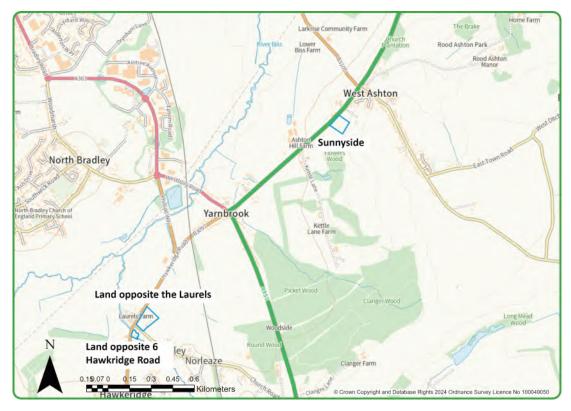


Figure 44: Land at Capps Lane, Penn Farm sites, Hedgerow Stables, Bonnie Farm, and Land at Lower Westbury Road

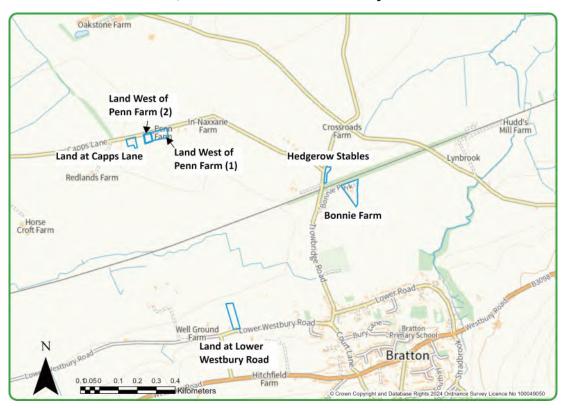


Figure 45: Fairhaven Gypsy Site, Land at White Horse View, Land adjacent Hisomley Farmhouse, and The Poplars

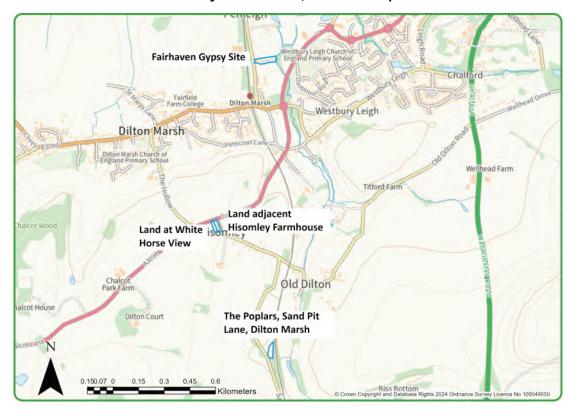


Figure 46: Ernies Yard

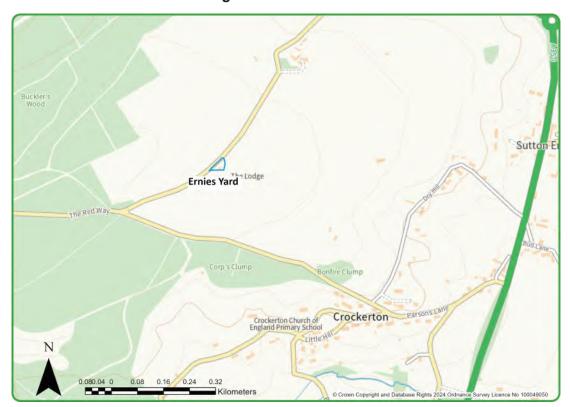


Figure 47: The Yard (No. 6 Old Court), The Caravan (No. 9 Old Court), Jacob Manor, and Former Glenville Nurseries

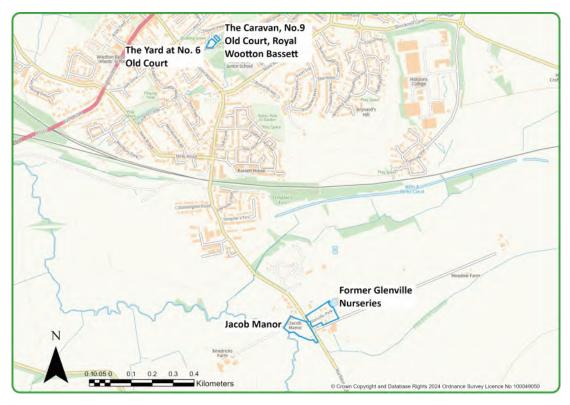


Figure 48: Nials Yard, Clanville

Nials Yard, Clanville 0.17 0.26

Figure 49: Porton Road, Amesbury

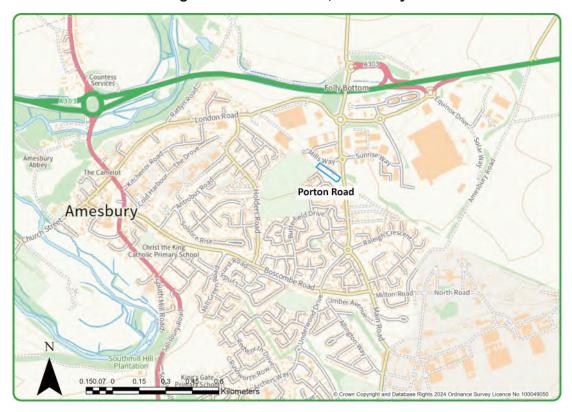


Figure 50: Land at west side of B3092 (Mapperton Hill, Mere), and Land at Jane Oaks Farm (Mere)

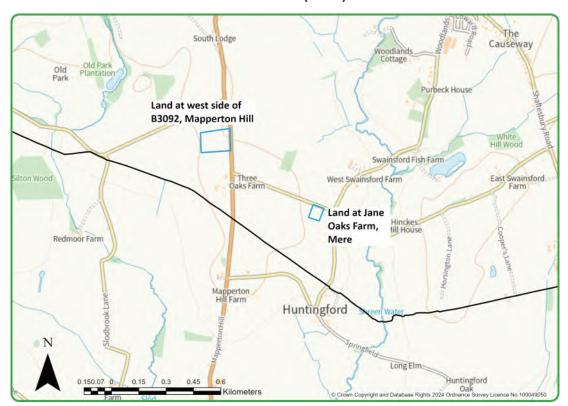
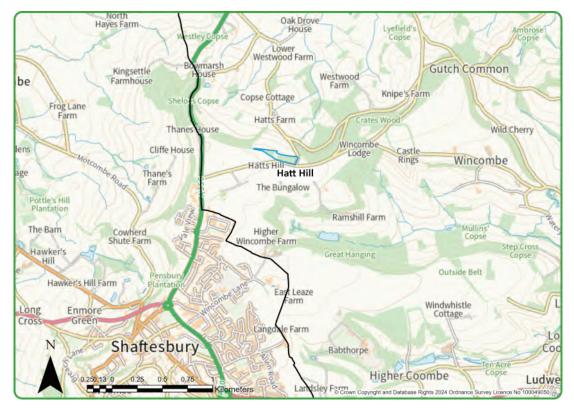


Figure 51: Hatt Hill, Shafetsbury



Bridge House

Field Down

Field Down

Figure 52: Broken Cross, Little Acre, and Viny Ridge

Figure 53: Badgers Rest

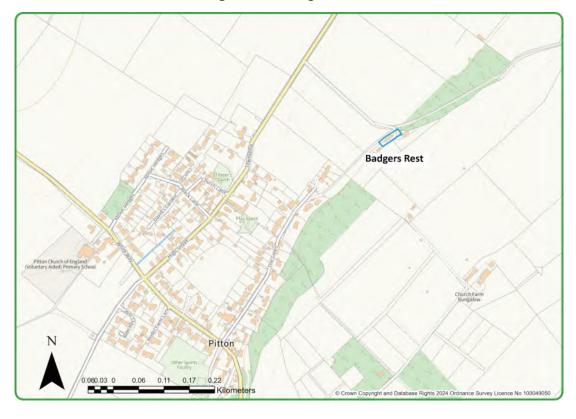


Figure 54: Salisbury Sites

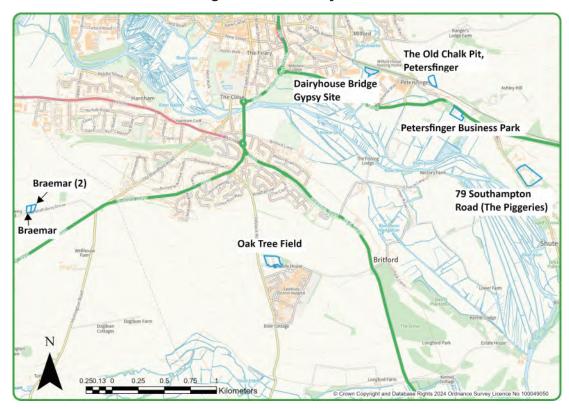


Figure 55: Valley View, and Dillons Farm



Conserved Farm

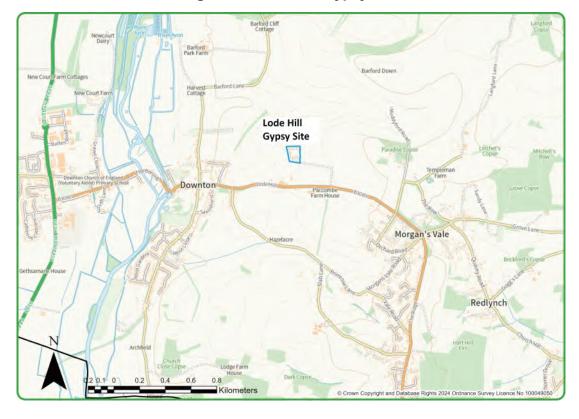
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Figure 56: Llamedos, and Tricky's Paddock





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Figure 58: Blandford Road

Wiltshire Council

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# Gypsies and Travellers Development Plan Document

Regulation 22 (1)(c)

**Consultation Statement** 

February 2025

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# 1. Introduction

# **Purpose**

- 1.1 This Consultation Statement sets out how Wiltshire Council (the council) has undertaken its duties in preparing the Draft Wiltshire Gypsies and Travellers Development Plan Document 2024 2038 (the Plan) in accordance with Regulations 18 ¹ and 19 ² of the Town and Country Planning (Local Planning) (England) Regulations 2012, hereafter referred to as the TCPR. This statement summarises the stages of consultation that have taken place, explaining who and how the public and stakeholders were invited to participate and make representations, outlining how the main issues raised from the Regulation 18 stages of consultation were taken into account in preparing the Plan whilst also presenting the main issues arising from the Regulation 19 consultation. The presentation of the main issues arising from the Regulation 19 consultation within this report, founded upon the tests of soundness and legal compliance against which the Plan is to be examined, is intended to assist in facilitating a transparent and efficient examination process led by the Planning Inspectorate.
- 1.2 This statement satisfies the requirements of Regulation 22 (1)(c) of the TCPR and demonstrates that consultation on the preparation of the Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement<sup>3</sup> <sup>4</sup>. Some stages of the preparation of the Plan took place during the COVID-19 pandemic. Due to this the 2021 consultation was carried out in line with the council's adopted Statement of Community Involvement and Temporary Arrangements Statement of Community Involvement <sup>5</sup>. The temporary arrangements document represented a response to guidance to Local Planning Authorities to review their Statement of Community Involvement in accordance with Government advice aimed at preventing the spread of COVID-19. The measures within the Temporary Arrangements document reflected the necessity to allow plan-making to progress while promoting effective community engagement by means which were reasonably practicable.
- 1.3 The Statement of Community Involvement document sets out how the council will consult and involve the public and statutory consultees in planning matters. The Statement of Community Involvement has been instrumental in shaping the way in which the Plan has been prepared from inception through to submission. The Statement of Community Involvement will also be used to guide any subsequent consultation required through the Examination process on matters such as 'Main Modifications' to the Plan.
- 1.4 The consultation exercises undertaken by the council have provided early, effective and meaningful engagement with what the TCPR and the council's Statement of Community Involvement define as 'specific' and 'general' consultation bodies. This has included the 'prescribed bodies' and neighbouring local planning authorities, as required by the duty to cooperate.
- Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies the consultation that the local planning authority must undertake before it can proceed to publish a 'publication', or 'pre-submission' version of the Gypsies and Travellers Development Plan Document
- Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 specifies that the local planning authority must make available the proposed submission documents for a period of consultation prior to submission of the Gypsies and Travellers Development Plan Document
- 3 Statement of Community Involvement Wiltshire Council (July 2020)
- Section 18 of the Planning and Compulsory Purchase Act 2004 (3) requires local planning authorities to prepare a Statement of Community Involvement
- 5 <u>Statement of Community Involvement Temporary Arrangements.</u> Wiltshire Council (July 2020) Page 490

1.5 The council has prepared a separate Duty to Cooperate Statement which sets out how the council has proactively engaged with 'prescribed bodies' and complied with the duty to cooperate in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011).

# **Background**

- 1.6 This Consultation Statement describes how the council has undertaken community participation and stakeholder involvement in the production of the Plan, setting out how such efforts have shaped the Plan and the main issues raised by the consultations and submitted representations.
- 1.7 The primary purpose of the Plan is to address and provide for the future accommodation needs of gypsies and travellers and travelling showpeople in Wiltshire. It will replace 'Core Policy 47: Meeting the needs of gypsies and travellers' of the Wiltshire Core Strategy (adopted January 2015).
- 1.8 The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. Together, both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire.
- 1.9 The Plan is being prepared in accordance with national planning policy including Planning Policy for Traveller Sites (PPTS, 2023)<sup>6</sup> and the National Planning Policy Framework (NPPF, December 2023). It is based on robust evidence in the form of a Gypsy and Traveller Accommodation Assessment (GTAA) <sup>7</sup>that establishes the accommodation needs of Wiltshire's travelling community from 1 April 2024 to 31 March 2038.
- 1.10 The council started preparing the Plan in 2020 and consulted on the proposed scope and content of the Plan in 2021 in line with Regulation 18 of the TCPR. This was informed by an up-to-date GTAA at the time. The first round of public consultation was held between 13 January and 9 March 2021. The council consulted with a range of stakeholders, including prescribed bodies, neighbouring local planning authorities, both statutory and non-statutory bodies, as well as local communities.
- 1.11 The Plan will form part of the development plan alongside the emerging Wiltshire Local Plan review, the Wiltshire Housing Site Allocations Plan, the Chippenham Site Allocations Plan, made neighbourhood plans and the council's adopted Minerals and Waste Plans.
- 1.12 The draft Pre-Submission Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 of TCPA for a six-and-a-half-week consultation period lasting from Tuesday 20 August until Friday 4 October 2024. The council consulted a range of stakeholders including specific consultation and statutory bodies, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement<sup>8</sup>. Further information on the preparation of the Plan can be found within the 'Plan Production Timeline' section of this statement.

<sup>6</sup> Planning Policy for Traveller Sites (PPTS), December 2023

<sup>7</sup> Wiltshire Gypsy and Traveller Accommodation Assessment (GTAA), 2024

<sup>8</sup> Statement of Community Involvement, Wiltshire Council (July 2020)

### Structure of the Consultation Statement

- **1.13** The Consultation Statement comprises the following sections:
  - Section 1 is an introduction to this statement, providing context.
  - Section 2 sets out the timeline which has been followed in preparing the Plan, explaining and providing the narrative for each stage of its preparation, which is in accordance with the up-to-date Local Development Scheme<sup>9</sup>.
  - Section 3 summarises the consultation process and the main issues raised during the course of the consultation carried out under Regulations 18 and 19 <sup>10</sup> and how the comments received have been considered by the council.
  - Section 3 is supported by the two Appendices providing more technical detail of how consultation
    was undertaken, the responses received at Regulation 18 and 19 stages and how these
    comments have been considered.
- **1.14** Appendix 1 of this statement explains:
  - who was invited to make representations and how under Regulation 18 (in accordance with Regulation 22 (1)(c)(i) and (ii).
  - a summary of the main issues raised by those persons under Regulation 18 (in accordance with Regulation 22 (1)(c)(iii)).
  - how those issues have been addressed in the preparation of the Plan (in accordance with Regulation 22 (1)(c)(iv)).
- **1.15** Appendix 2 of this statement explains:
  - how those issues have been addressed in the preparation of the Plan under Regulation 19 (in accordance with Regulation 22 (1)(c)(iv)). This appendix also includes a summary of the key issues raised against the Plan in the order they appear in the Plan.
- 1.16 Copies of all representations made in accordance with Regulation 20 (comments received as part of the Regulation 19 consultation) are available to view online <sup>11</sup>.

<sup>9 &</sup>lt;u>Local Development Scheme</u>, Wiltshire Council (2024)

<sup>10</sup> In accordance with Regulation 22 (1)(c)(v)

Available via the the council's consultation portal

# 2. Plan Production Timeline

- 2.1 This section of the statement sets out the timeline that has been followed in preparing the Plan. Table 2.1 outlines the main stages of consultation in the preparation of the Plan up until the date of submission.
- 2.2 Amendments to the Council's Local Development Scheme timeline were approved by <u>Cabinet on 24 March 2020</u>, which made provision to change the scope of the Wiltshire Local Plan review and progress a separate single-issue plan that meets the accommodation needs of Gypsies and Travellers. Two public consultation stages followed, in line with the up-to-date Local Development Schemes at the time of the consultation.

Table 2.1 The Plan production timeline up until the date of submission

Consultation	Dates
Wiltshire Gypsies and Travellers Development Plan Document Regulation 18 consultation	13 January to 9 March 2021 (in accordance with Regulation 18 of the TCPR)
Pre-Submission Wiltshire Gypsies and Travellers Development Plan Document Regulation 19 consultation	20 August to 4 October 2024 (in accordance with Regulation 19 of the TCPR)

2.3 Further information about these stages of consultation is provided below. Information has also been provided, as part of the commentary on the plan production timeline, on other key developments and milestones that have taken place during the preparation of the Plan to assist in illustrating the work undertaken during its preparation.

# **Regulation 18 consultation 2021**

- 2.4 Following approval by Wiltshire Council's Cabinet on 13 October 2020, a consultation on the scope and content of the Plan under Regulation 18 of the TCPR took place between 13 January and 9 March 2021 (a period of eight weeks). This took place alongside consultation on the Wiltshire Local Plan review, as reported to Cabinet on 1 December 2020.
- 2.5 This consultation was aimed at enabling the community and stakeholders to inform and comment upon how the Gypsies and Travellers Plan might deliver the required level of sites/pitches across Wiltshire. By undertaking consultation prior to any allocations being made in a draft Plan, the intention was for people to have the opportunity to put forward their views and inform the Council's thinking in this regard. These views then informed the details of the draft Plan.
- 2.6 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 guidance to Local Planning Authorities to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19. 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.
- 2.7 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 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.

- 2.8 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)' (GTAA)
- 2.9 All the information that was published is available on the Council's website at <u>Previous consultations</u> (Regulation 18) Wiltshire Council
- **2.10** As set out in the Council's up-to-date Local Development Scheme (LDS)<sup>12</sup> at the time of consultation, the role of the Plan is to:
  - "...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 and Travellers' of the Wiltshire Core Strategy."
- **2.11** In summary, the intention was that the consultation would invite comments on:
  - The scope and objectives of the Plan;
  - Wiltshire's travelling communities and their accommodation needs;
  - Findings of GTAA and level of provision to be planned for;
  - Proposed approach to meeting accommodation needs and site; assessment criteria; and
  - Call for sites to help identify land that may be suitable for new sites.
- 2.12 The 'Planning for Wiltshire's Gypsy and Traveller Communities Consultation document' set out the proposed scope of the Gypsies and Travellers Plan, which intended 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.
- 2.13 The 'Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)' as a key piece of evidence informing the Plan identified permanent and temporary accommodation needs for gypsies and travellers and travelling showpeople for the period 2019-2036.
- **2.14** The consultation documents were prepared to stimulate discussion on how the Plan should evolve.

2.15 Following the consultation, the Council also invited representations from Historic England, Natural England and the Environment Agency on the 'Sustainability Appraisal (incorporating SEA) Scoping Report' (2021)<sup>13</sup>. This proposed a Sustainability Appraisal Framework, including objectives and decision aiding questions, to be used in the assessment of draft policies and proposals as part of the plan making process.

Table 2.2 List of documents consulted upon through the Regulation 18 consultation that took place between 13th January and 9th March 2021

Document	Further information
Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document	This document sets out the proposed scope of the Gypsies and Travellers Development Plan Document, 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.

- 2.16 Overall, 64 representations were made from different stakeholders including parish and town councils and 20 travellers who responded by telephone. During the consultation the opportunity was also taken to engage with travellers on unauthorised encampments. A detailed summary of this consultation, including the process followed and outcomes arising, can be found in a the 'Gypsies and Travellers Development Plan Document Consultation Report', 2021<sup>14</sup>.
- 2.17 Following the consultation, <u>Cabinet on 13 December 2022</u>, approved a revised Local Development Scheme (December 2022) which updated the timeline for the Gypsies and Travellers Plan and extended the plan period to 2038. Aligned to this the base-date was updated to 2022. To ensure the evidence base informing the Plan remained up-to-date, the 2020 GTAA was updated in 2022 and 2024.

# **Pre-Submission Wiltshire Gypsies and Travellers Development** Plan Document Regulation 19 consultation 2024

- 2.18 In July 2024, Wiltshire Council's Cabinet (15 July 2024) and Full Council (24 July 2024) approved the Wiltshire Gypsies and Travellers Development Plan Document - Pre-submission Draft for publication in line with Regulation 19.
- In response to the Regulation 18 consultation and to take into account the more recent change 2.19 to national planning policy in relation to the definition of gypsies and travellers, the council's gypsy and traveller accommodation assessment has been updated to ensure the plan is robust and informed by up-to-date evidence.

Sustainability Appraisal Scoping Report, 2021

Gypsies and Travellers Development Plan Document Consultation Report, 2021 Page 495

- 2.20 The Gypsy and Traveller Accommodation Assessment (June 2024) (GTAA) has a base date of 1 April 2024 (forming the start of the plan period) and identifies needs across the plan period to 2038. It takes into consideration the revised definition of travellers, which includes those who for educational, health or old age have ceased to travel temporarily or permanently. Previously travellers who had ceased to travel (for whatever reason) were not included. This change was introduced by the December 2023 update to the Government's Planning Policy for Traveller Sites.
- 2.21 Core Policy 47 has been reviewed to ensure the Plan provides a sound basis on which to make provision for the needs of the travelling community and is replaced by policies that work collectively to do this. These include policies allocating new sites and existing sites to allow for additional pitches/plots<sup>15</sup> to come forward as well as safeguarding existing sites so that they can continue to meet needs in the longer term. The Plan takes a supportive approach to allowing for the siting of additional caravans on sites to meet an identified need from teenagers and young single adults, subject to grant of planning permission.
- 2.22 A criteria-based policy is also included to assess other new sites that may come forward to meet demonstrable local needs that arise during the plan period, for example from undetermined households in the GTAA that are later established to meet the planning definition. It also includes a policy to address the needs of households that do not meet the planning definition of travellers, but nonetheless have protected characteristics and may require culturally appropriate accommodation such as mobile homes. There is also a policy covering emergency stopping sites.
- 2.23 In addition, preparation of the Plan has also included the consideration of council owned land to identify sites for allocation due to the lack of private sites put forward through the call for sites exercises.
- 2.24 Wiltshire Council published the proposed submission Regulation 19 version of the draft Plan and supporting documents, including the Sustainability Appraisal, in accordance with Regulation 19 of the TCPR for a consultation period running from Tuesday 20 August to Friday 4 October 2024. The consultation represented an opportunity for all interested parties to have their say on the proposals.
- **2.25** The consultation included the following:
  - Online publication of consultation documents on the council's website including the consultation portal.
  - Consultation documents made available for viewing at the council's main office hubs and/or council libraries as appropriate.
  - Press release and publication of adverts in local newspapers covering Wiltshire advertising the start of the consultation.
  - Notifications sent to all Members and Town and Parish Councils.
  - Publicity through council newsletter.
  - Email/letter to consultees on strategic planning consultation database informing them of the consultation.
  - Social media campaign raising awareness of the consultation and how to engage.

When referring to the accommodation needs of these groups reference is made to 'pitches' when referring to gypsies and travellers and to 'plots' when referring to travelling show people.

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- In person engagement events and webinar.
- Chair's announcements where possible at Area Board meetings leading up to and at the start of the consultation to publicise the consultation and raise awareness.
- Easy read leaflet was sent to Gypsy and Traveller pitches and Travelling Showpeople plots across the county.
- The council commissioned a third party to provide additional engagement mechanisms for the Gypsy and Traveller and Travelling Showpeople communities through a mix of site visits, telephone and email channels.
- 2.26 Further information about how this consultation was undertaken can be found within Appendix 2 of this report. A summary of the main issues raised as part of this consultation, in accordance with Regulation 22 (1)(c)(v) of the TCPR, and how the comments received have been considered by the Council can be found within Section 3 of this report.

# 3. Summary of the main issues

# Summary of the consultation process

# Regulation 18

- 3.1 Public consultation under Regulation 18 of the TCPR took place in 2021. This consultation invited comments on two main documents: 'Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document' and 'Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)'.
- 3.2 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 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 and the council was able to comply with Regulation 35(1)(a) by making development plan documents available on their website.
- **3.3** Further information summarising this Regulation 18 consultation, extracting some key elements from the report in accordance with Regulation 22 (1)(c)(i) to (iv))35, can be found within Appendix 1 of this report.

# Regulation 19

- 3.4 In July 2024, Wiltshire Council's Cabinet (Monday 15 July 2024) and Full Council (Wednesday 24 July 2024) approved the Wiltshire Gypsies and Travellers Development Plan Document Pre-submission Draft publication in line Regulation 19. The proposed submission Regulation 19 version of the Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 of the TCPR for a consultation period from Tuesday 20 August 2024 to Friday 4 October 2024.
- 3.5 Appendix 2 provides details of how the requirements of Regulation 22(1)(c)(v)<sup>16</sup> have been met, detailing how this consultation was carried out, who was consulted alongside statistics regarding the number of representations made pursuant to regulation 20. Appendix 2 also presents, at Schedule 2, a summary of key issues raised in those representations, this being intended to provide a more comprehensive list of the issues consultees have raised against each part of the Plan, more comprehensive then the refined list of main issues within the body of this report. A summary of the main issues raised at Regulation 19/20 is provided in the following section of this report.

# Main issues raised pursuant to Regulations 19/20

3.6 A total of 658 comments were received in response to the Regulation 19 consultation. One petition was received with 487 signatures (Policy GT30 Land at Whistley Road, Potterne) and several representations were submitted on behalf of community groups including The Community of Little

Regulation 22(1)(c)(v) sets out the need to outline the number of representations made and a summary of the main issues. The main issues are detailed within the body of this report

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Somerford, Cleverton and Surrounding Area (206 people), Thickthorn and Preston Neighbourhood Group (56 people), Your Village Your Say (Rowde) and Potterne Residents. All the comments can be viewed verbatim within the council's consultation portal<sup>17</sup>. Within the consultation portal all representations can be viewed against the part of the Plan to which they relate whilst also being viewable based on who submitted comments.

- 3.7 Unlike earlier stages of the Plan preparation whereby engagement was aimed at shaping the Plan, at the Regulation 19 stage, the council is satisfied that the Gypsies and Travellers Development Plan Document is complete and invited representations on whether stakeholders feel the Plan is sound and / or legally compliant. These representations then define the context and the discussion within the subsequent independent examination.
- To help understand what stakeholders have said and to guide the independent examiner, as per the TCPR, it is important main issues are identified from those representations. To assist with this, and to understand what stakeholders have said against each part of the Plan, tables of key issues have been provided within Appendix 2 summarising key elements of what stakeholders have said against each part of the Plan. These key issues have then informed the formulation of main issues, a more succinct list of issues arising from the representations. Representors should understand that these lists of issues do not represent all issues raised through the consultation, rather those the council have identified as main challenges to the soundness of the draft Plan. There are sections/policies where no main issues have been identified. The more comprehensive list of key issues within Appendix 2 also provides information on who has informed each issue, providing further context behind each of the main issues.
- 3.9 The main issues are presented in plan order in a series of tables. Consideration should be given that some main issues, whilst listed against a certain part of the Plan, may reflect issues that have a wider application to simply that part of the Plan. Within each table, where applicable, main issues may have been grouped under thematic headings. The presentation of main issues is preceded by a summary of what specific consultation bodies and neighbouring authorities have said.
- 3.10 For both the tables of main issues and of what prescribed bodies and neighbouring authorities have said, council responses have been issued in some circumstances, often against thematic headings, where this was considered helpful to provide context and response to overarching strategic matters of challenge to assist the examination process. These responses are also intended to introduce and cross reference to other documents that have been prepared, such as statements of common ground, to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in many cases the strategic responses issued by the council to certain themes provide an overarching context to any more specific and detailed main issues raised by consultees, the details of which can be borne out in the examination.
- 3.11 To assist the examination process, considering the main issues raised, the council understands there may be the need for potential amendments to the proposed submission plan to clarify and improve its overall content. These, in part, may be presented within accompanying signposted documents such as statements of common ground for consideration in due course. A separate schedule of potential changes document has been prepared to help inform the inspector to potential changes to the plan for consideration and subsequently have not been the subject of public

consultation or sustainability appraisal. This schedule has been submitted in accordance with the approach set out in the Planning Inspectorate's Procedure Guide for Local Plan Examinations (updated 28 August 2024).

# Prescribed bodies and neighbouring authorities

3.12 As anticipated by the TCPR and the Statement of Community Involvement, specific consultation bodies and neighbouring authorities have been consulted on the pre-submission proposals. A high-level summary of the response from these bodies and the main issues raised is set out below.

# **Natural England**

Table 3.1 Summary of main issues raised by Natural England and Council response

### **Natural England**

The Habitats Regulations Assessment concluded that the Plan will not result in adverse effects on the integrity of European sites. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England is satisfied and thus have no objection to the proposals, providing that all mitigation measures are appropriately secured in any permission given.

### **Council response**

Noted and welcomed.

## **National Highways**

Table 3.2 Summary of main issues raised by National Highways and Council response

### **National Highways**

National Highways have identified no specific areas of concern with regards to soundness and potential adverse impacts on the Strategic Road Network. In relation to Objective 3, the reference to sites needing to be in appropriate and sustainable locations with access to services and facilities is supported.

National Highways supports the criteria set out in Policy GT3 on accessibility; vehicular and pedestrian access; impacts on highway safety; and internal site layouts.

In relation to Policy GT7 (Calcutt Park), National Highways considers that the allocation for 1 additional pitch is unlikely to impact on the nearby A419 junction.

In relation to Policy GT18 (Petersfinger Business Park), National Highways considers that, whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing A36 access arrangements, any re-arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.

With regards the proposed new sites, these appear to be in locations and of a scale that is unlikely to impact the Strategic Road Network.

### **Council response**

Noted and welcomed. In relation to Petersfinger Business Park, proposals for intensification to meet the identified need must be in accordance with Policy GT18 and Policy GT3. Policy GT3iv, v, and ix address highway safety and internal design of the site and proposals must comply with the respective technical requirements.

### **Environment Agency**

Table 3.3 Summary of main issues raised by Environment Agency and Council response

### **Environment Agency**

There are a few site allocations that are located in close proximity to current Flood Zones 2 and 3. As the Environment Agency does not know the full extent of future flood zones, it is advised that the Plan requires planning applications to include a sequential approach to site design, ensuring that all built development is outside Flood Zone 2 and 3.

There are two proposed sites which contain small amounts of Flood Zone 2 and 3: Policy GT7 – Calcutt Park (flood zone 2); and Policy GT18 – Petersfinger Business Park (flood zones 2 and 3). Any residential accommodation must not be located within current Flood Zones 2 and 3 on the above sites.

Two of the proposed site intensification sites are located on Historic Landfill sites: Policy GT22 – Melbourne view; and Policy GT9 – Easton Lane. As part of the planning application to develop these sites the developer would need to ensure that the development would not create unacceptable risk of pollution from any contamination that might exist.

To ensure the risks from historic contamination are appropriately managed, the Environment Agency would expect any planning applications to be supported by a risk assessment in line with our guidance Land contamination risk management (LCRM). Should intrusive site investigation be required following the initial Phase 1 Risk Assessment, it is essential that that is carried out with care and using appropriate techniques to ensure no new pathways are created or contamination mobilised.

Environmental Permits might be needed for any discharges (e.g., sewage or trade effluent) from these sites.

### **Council response**

Noted and welcomed. At Calcutt Park, Flood Zone 2 covers a small area at the northern end of the site. Policy GT7 directs development to Pitch 12, which is not affected by Flood Zone 2.

Regarding Policy GT18, the flood zones lie to the south and southeast of the site. The Site Selection Report Appendix 2 identifies a potential area for development on page 96 (delineated in green) outside the flood zones, but the allocation in GT18 covers the entire site. It is acknowledged there may be a need to consider a change to Policy 18 as part of the examination process to clarify that no development should be in Flood Zone 2 and 3 where they encroach into the site shown on the Policy Map. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

Regarding Policies GT9 and GT22 it is noted that the Environment Agency expects a risk assessment in line with Land Contamination Risk Management Guidance at the planning application stage. It is acknowledged there may be a need to consider a change to the supporting text to Policies GT9 and GT22 as part of the examination process to address the issue of land contamination risk management. To assist this process, a corresponding proposed change on land contamination risk assessment will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

# Historic England

Table 3.4 Summary of main issues raised by Historic England and Council response

### **Historic England**

Historic England did not provide a representation but have subsequently confirmed that they have no comments on the Gypsies and Travellers Development Plan Document.

### **Council response**

### **Historic England**

Noted.

### Swindon Borough Council

Table 3.5 Summary of main issues raised by Swindon Borough Council and Council response

### **Swindon Borough Council (SBC)**

Swindon Borough Council may request if neighbouring authorities can assist in meeting the need for Travelling Showpeople if they are unable to accommodate a site within Swindon. This issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.

Under Appendix 1 of the Duty to Cooperate Statement, it would be useful to list Swindon Borough Council, noting the above issue and that Swindon Borough Council was engaged in a similar capacity to other Neighbouring Authorities during the development of the Plan.

Swindon Borough Council looks forward to continuing to work constructively with Wiltshire Council and in particular on broad locations for emergency stopping sites and wider practical policy matters.

### **Council response**

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Swindon Borough Council on these matters, including any emerging evidence and policies on meeting needs for gypsies and travellers in Swindon Borough, in accordance with national planning policy and legislation.

The Duty to Cooperate Statement has been updated to reflect the latest position expressed by Swindon Borough Council.

### Bath and North East Somerset Council

Table 3.6 Summary of main issues raised by Bath and North East Somerset Council and Council response

### **Bath and North East Somerset Council**

Within prior meetings with Wiltshire Council, no formal request to Bath and North East Somerset to helping address unmet needs has been made. This approach is supported by Bath and North East Somerset Council. Prior discussions indicated the approach of meeting unmet need or household growth for those not meeting the planning definition of Gypsies and Travellers would be met within the Wiltshire boundary.

The approach taken in terms of local authorities addressing requirements of Gypsies and Travellers who do not meet the national Planning Policy for Traveller Sites planning definition is fairly common.

Unmet need can be met through windfall proposals that are consistent with relevant strategic settlement and housing policies in the Local Plan. This would apply for any windfall site within any local authority and should households from Wiltshire (or anywhere else) seek to purchase land to develop a site in Bath and North East Somerset their planning application would also have to comply with Bath and North East Somerset Local Plan policies.

Bath and North East Council note that Wiltshire Council is generally proactive in taking new sites and changes to existing sites (such as intensification) forward, unless they do not comply with their Local Plan policies.

### **Bath and North East Somerset Council**

Careful monitoring should be undertaken of whether and how the need for pitches for households forming in Wiltshire that do not meet the planning definition is being met. The information from this monitoring will need to inform future review of policy and may, dependent on the conclusions, require consideration to be given to identifying additional sites in areas within Wiltshire close to where the need is arising. As with previous discussions, ongoing collaboration and dialogue is requested on this matter.

Bath and North East Somerset Council welcomes the opportunity to continuing discussing the approach being taken to Gypsy and Travellers needs within Wiltshire to understand and ensure the implications for communities in Bath and North East Somerset are understood and appropriately managed.

### **Council response**

Noted and welcomed. The Plan's Monitoring chapter sets out the approach taken to monitoring of planning permissions and meeting identified need for households that do not meet the planning definition. Wiltshire Council look forward to continuing to liaise with Bath and North-East Somerset Council on these matters and others, in accordance with national planning policy and legislation.

### New Forest District Council

### Table 3.7 Summary of main issues raised by New Forest District Council and Council response

### **New Forest District Council**

Generally, the Plan is supported by New Forest District Council (NFDC) as a comprehensive approach, including support for the approach to traveller households who do not meet the definition and safeguarding existing sites.

The approach of maximising capacity and the potential of existing sites, subject to environmental, heritage and landscape constraints, is supported.

NFDC trusts that the identification and delivery of a further 2 sites in the south and west of Wiltshire, in accordance with Policy GT5 (Emergency Stopping Sites), will be subject to Appropriate Assessment screening to ascertain impacts on internationally protected sites such as the New Forest SPA/SAC/Ramsar; and that impacts upon the Cranborne Chase and West Wiltshire Downs National Landscape and its setting will also be a consideration in site selection.

The recognition of international protected sites in paragraph 3.37 is welcome, although this should be reflected in the wording of Policy GT3 as well as recognition that likely significant effects from any new sites that come forward may need fresh consideration under Appropriate Assessment, as required by the Habitat Regulations.

The overall conclusion of the Habitats Regulation Assessment that the Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and policies is welcomed. However, this will require ongoing monitoring in line with the Habitats Regulations, particularly if new sites, including Emergency Stopping Sites are to be identified in future.

Given Blandford Road site's location in the National Landscape, NFDC supports that it is not identified for intensification.

The administrative area of Wiltshire Council overlaps with the New Forest National Park in Wiltshire, which is covered by the New Forest National Park authority (NFNPA). It would be helpful if the Plan clarified this. It should be noted that New Forest District Council and the NFNPA are undertaking their own GTAA that will cover this area and will inform future Local Plan policies for the New Forest National Park area.

### **Council response**

### **New Forest District Council**

Noted and welcomed. The requirement for an appropriate assessment at planning application stage is set out in legislation and national planning policy and it is not necessary to repeat the requirements in Policy GT3 and supporting text.

The requirement for an appropriate assessment at planning application stage is set out in legislation and national planning policy and it is not necessary to repeat the requirements in Policy GT5 or supporting text as the location of the two yet to be identified emergency stopping sites is not known at this stage.

It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.

Wiltshire Council look forward to continuing to liaise with the New Forest District Council on these matters and others, in accordance with national planning policy and legislation.

### South Gloucestershire Council

Table 3.8 Summary of main issues raised by South Gloucestershire Council and Council response

### **South Gloucestershire Council**

South Gloucestershire Council is generally supportive of the approach taken through the Plan to meeting the accommodation needs of Wiltshire's travelling communities.

Policy GT5 is of particular interest to South Gloucestershire Council as, although the Gypsy and Traveller Accommodation Assessment recommends that there is no need for a formal public transit site in South Gloucestershire at that time, it did recommend that the situation should continue to be monitored and management-based approaches such as negotiated stopping should be considered.

Overall, officers consider that the Plan sets a clear and robust strategy for meeting the identified needs of Wiltshire's travelling communities. The approach set out, and its constituent parts which includes specific site allocations and setting an updated criteria-based policy framework, is considered to be positively prepared, justified, effective and consistent with national policy.

### **Council response**

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with South Gloucestershire Council on these matters and others, in accordance with national planning policy and legislation.

## Somerset Council

Table 3.9 Summary of main issues raised by Somerset Council and Council response

#### **Somerset Council**

Somerset Council has no specific observations to make on the Plan.

Somerset Council will continue to engage and work with Wiltshire Council on cross-boundary strategic planning matters including Gypsies and Travellers through the Duty to Co-operate.

#### **Council response**

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Somerset Council in accordance with national planning policy and legislation.

# Gloucestershire County Council

Table 3.10 Summary of main issues raised by Gloucestershire County Council and Council response

## **Gloucestershire County Council**

Addressing the impact of Traveller sites on climate is beneficial for all stakeholders within and outside Wiltshire Council. Transport is one of the major contributors to emissions for local authorities, and reducing emissions is a benefit to surrounding air quality. Proximity to public transport, walking and cycling infrastructures, all play a key role in reducing transport emissions. Perhaps, this can be further emphasised in the Site Selection Report.

Gloucestershire County Council notes that Policy GT3 mentions mitigation of development on air quality. This is critical as both the National Planning Policy Framework and the Planning Policy for Traveller Sites highlight impact on air quality. It is worth considering if there can be an impact to any nearby Air Quality Management Areas in Wiltshire because of the policy.

Tables with colour codes (e.g., Table 20 in the Site Selection Report) should be accompanied with a key along with some explanations of the findings.

#### **Council response**

Noted and welcomed. Wiltshire Council agrees that where possible, Traveller sites should be at or near sustainable transport nodes. However, the supporting evidence for the Plan (Site Selection Report and Planning Policy Criteria Review Report) note the rurality of Wiltshire and the need to strike a balance between accessibility and transport sustainability on the one hand, and land availability on the other. Land availability would be unduly constrained if Policy GT3 contained a stricter requirement for accessibility and sustainable transport requirements.

In terms of Air Quality Management Areas, Wiltshire Council does not consider that traffic to and from traveller sites is likely to considerably worsen air quality in those areas due to the limited growth associated with this land use.

In terms of the colour coding and assessment summaries, Table 20 summarises the detailed findings in the Sustainability Appraisal assessments where the explanation and colour coding can be found. Wiltshire Council look forward to continuing to liaise with Gloucestershire County Council on these matters and others, in accordance with national planning policy and legislation.

## **Dorset Council**

## Table 3.11 Summary of main issues raised by Dorset Council and Council response

#### **Dorset Council**

Dorset Council does not consider that the distribution of proposed allocations and safeguarded Gypsy and Traveller sites are likely to raise any significant strategic cross boundary matters or issues for Dorset Council. The broad location of search in the south-east of Wiltshire for emergency stopping sites. This search extends up to the shared boundary between Dorset and Wiltshire. Dorset Council would welcome the opportunity for further constructive and active engagement on this issue as part of ongoing co-operation between the councils.

Dorset Council will maintain constructive and active engagement with Wiltshire Council on its emerging local plan, and in particular the strategy for meeting Dorset's need for Traveller pitches and plots and any related strategic matters.

#### **Council response**

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Dorset Council on these matters and others, in accordance with national planning policy and legislation.

# **New Forest National Park Authority**

## Table 3.12 Summary of main issues raised by New Forest National Park Authority and Council response

## **New Forest National Park Authority**

It is noted that the Key Diagram in Figure 1 helpfully illustrates the boundary of the New Forest National Park around the southern part of Wiltshire. However, it is not entirely clear in this diagram alone what the extent of the Plan area is, although this is helpfully set out in paragraph 1.2. A line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful. Alternatively, a note underneath the Key Diagram explaining the extent of the Plan area would also be useful.

#### **Council response**

Noted and welcomed. It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.

Wiltshire Council look forward to continuing to liaise with the National Park Authority on these matters and others, in accordance with national planning policy and legislation.

## West Berkshire Council

## Table 3.13 Summary of main issues raised by West Berkshire Council and Council response

#### **West Berkshire Council**

West Berkshire Council supports Policies GT1, GT2, GT3, GT4 and GT5 in identifying the methods of meeting the needs of the travelling community within Wiltshire together with emergency stopping places.

Under the duty to cooperate, Wiltshire Council and West Berkshire Council have previously discussed the approach taken and whether there are any cross-boundary issues (none were raised).

#### **Council response**

Noted and welcomed.

# **West Berkshire Council**

Wiltshire Council look forward to continuing to liaise with West Berkshire Council on these matters and others, in accordance with national planning policy and legislation.

# Main issues: Gypsies and Travellers Development Plan Document Section 1

- 3.13 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document section 1, namely:
  - What is this Plan?
  - How to use this Plan?
  - How has this Plan been prepared?
  - Next steps

## Main issues: Section 1

## Table 3.14 Gypsies and Travellers Development Plan Document section 1 main issues

## Main issues raised: Section 1

#### **Consultation Process**

- Parish Councils: Consultation with parish councils at an earlier stage regarding the site selection process and the proposed sites would have been beneficial.
- Local community consultation: The Plan has not been created in consultation with local communities and does not consider the impact on settled residents.
- Advertisement of consultation: The consultation process was not widely advertised. A letter should have been sent to everyone in Wiltshire informing them of the process and proposals.

#### **Site Selection Process:**

- Sites omitted that could be expanded as alternatives: A number of existing Gypsy and Traveller sites were omitted from the existing sites in the appraisal that could be expanded as alternatives to new sites. The identified need for 81 pitches should be reduced following the recent granting of planning permissions to 68 pitches. Other planning applications in the pipeline and unauthorised pitches could be considered suitable and could prevent further development in the open countryside.
- Unauthorised pitches: Reference made to numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be suitable, even considered brownfield land rather than taking areas of open countryside.

#### The Plan:

- Accommodation needs: The Plan is not sound. Query the need to meet accommodation needs.
- The Plan is difficult to navigate: The plan is difficult to navigate and does not promote cooperation and transparency.
- **Funding development of sites:** Query how development of the sites will be funded. A financial statement to complete the justification of sites would be expected.
- The Plan is out of date and discriminatory: Considers the plan document out of date and ethnically discriminatory.

#### Monitoring of sites:

 Site Management: Questions raised over who is responsible for the managing the sites, including maintenance and waste disposal and utilities:

#### **Council responses**

#### Consultation process:

Reports have been prepared to document the consultation the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.

#### **Site Selection Process**

• Sites omitted that could be expanded as alternatives: The Site Selection Report describes the approach taken to site selection. Where possible intensification and use of existing sites has been considered to minimise the need for new sites. It is acknowledged there may be a need to consider updating the pitch supply from planning permissions granted since 1 April 2024 as a potential change as part of the

#### Main issues raised: Section 1

examination process. To assist this process, a corresponding proposed change to Tables 3 and 4 of the Plan will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

 Unauthorised pitches: Unauthorised sites were assessed in the Site Selection Report if they could be allocated.

#### The Plan:

- Accommodation needs: The Plan has been prepared in accordance with national planning policy and is based on robust evidence of need in the form of a Gypsy and Traveller Accommodation Assessment (2024).
- The Plan is difficult to navigate: The Plan has been written with the intention to explain matters to the reader sufficiently.
- Funding development of sites: For privately-owned sites, delivery costs will be met by the site owners or leaseholders. For sites on Wiltshire Council owned land, leaseholders will be responsible for delivery costs. Temporary Emergency Stopping Sites will be delivered and managed by Wiltshire Council.
- The Plan is out of date and discriminatory: The Plan is informed by up-to-date evidence, including an Equality Impact Assessment The Plan sets out a strategy to meet the needs of all members of Gypsy and Traveller communities.

## Monitoring of sites

Private sites will be managed by the landowner in accordance with the planning permission and conditions, this includes mitigation measures. Sites owned by Wiltshire Council but leased out will be managed by the leaseholder in accordance with the planning permission and the terms of the lease agreement.

# Main issues: Gypsies and Travellers Development Plan Document Section 2

- 3.14 Presented below are the main issues raised with regards to Section 2 of the Gypsies and Travellers Development Plan Document (Regulation 19 Consultation version), namely:
  - Objectives

Table 3.15 Gypsies and Travellers Development Plan Document Objectives main issues

## **Section 2 (Objectives)**

- Agricultural Land: Plan should avoid impact on the best and most versatile agricultural land in the county.
- **Environmental requirements:** The plan has no consideration towards net zero targets, noise pollution requirements, flooding and infrastructure requirements.
- **Balanced communities:** Wiltshire Council should seek to support mixed and balanced communities in plan-making and decision taking.

#### **Council responses**

- Agricultural Land: The Site Selection Report describes the approach taken to site selection. While
  brownfield land or land of poor agricultural quality would be preferred, these sites did not advance to the
  allocation stage for planning reasons. Gypsy and Traveller sites are not considered to be significant
  development of agricultural land. The effects on a working farm were considered at the early stages of
  the site selection process.
- Environmental requirements: The Plan identifies opportunities for low carbon or renewable energy
  supply at sites where mains cannot be connected to. The policies in the Plan include requirements to
  mitigate against flooding and noise pollution, and to provide on-site infrastructure to support development.
  The Sustainability Appraisal Report has also assessed the likely effects of Plan policies and individual
  sites against a range of sustainability criteria that include climate change, energy, noise pollution, flood
  risk and infrastructure provision.
- Balanced communities: The Plan has been prepared in accordance with national planning policy and
  is based on robust evidence of need in the form of a Gypsy and Traveller Accommodation Assessment
  (2024) and accompanied by an Equality Impact Assessment which sets out the evidence and Wiltshire
  Council's approach to meeting its statutory duties under the Equality Act 2010.

# Main issues: Gypsies and Travellers Development Plan Document Section 3

- 3.16 Presented below are the main issues raised with regards to Section 3 of the Gypsies and Travellers Development Plan Document (Regulation 19 Consultation version), namely:
  - Strategy for Meeting Traveller Needs
  - Policy GT1 Meeting the needs of gypsies and travellers and travelling showpeople
  - Policy GT2 Safeguarding gypsies and travellers, and travelling showpeople sites
  - Policy GT3 New sites and intensification of existing sites
  - Policy GT4 Meeting the needs of gypsies and travellers for culturally appropriate accommodation
  - Policy GT5 Emergency Stopping Sites

# Main issues: Section 3

Table 3.16 Gypsies and Travellers Development Plan Document Strategy for Meeting Travellers Needs main issues

## **Section 3 (Strategy for Meeting Travellers Needs)**

- **Key diagram:** In the key diagram, a line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful.
- Concentration of traveller sites: There is an excessive concentration of sites to a particular area. Sites
  should be more evenly distributed across Wiltshire and better use should be made of the transport corridor
  afforded by the A338 and A346.

## **Council responses**

- **Key Diagram:** It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.
- Concentration of traveller sites: While a more equal distribution is a desirable approach, the availability of land is one of the main determining factors in identifying suitable sites.

Table 3.17 Gypsies and Travellers Development Plan Document Meeting the needs of Gypsies and Travellers and Travelling Showpeople main issues

## Policy GT1 - (Meeting the needs of Gypsies and Travellers and Travelling Showpeople)

- Planning Definition: Not including elderly or disabled Gypsies and Travellers does not account for accommodation needs of the whole community and is therefore discriminatory.
- **Net pitch targets:** The supply figures for pitches in paragraph 3.2 of the Plan appear to be invalid and should consider the significant number of newly approved sites and unauthorised sites that have sprung up, thereby reducing the residual need for new pitches down from 81 pitches.
- Equality: There should be equal treatment in terms of gaining permission for residential use.

#### **Suggested Modifications:**

- **Improve clarity:** The wording of Policy GT1 is ambiguous. Concerns raised on what constitutes appropriate intensification. The terms 'authorised sites' and 'safeguarded sites' are interchanged and thus should be clarified.
- Include reference to Policy GT3: Incorporate policies GT1 and GT2 with specific reference to compliance
  with policy GT3. Incorporating this into the policy wording would strengthen the policy's effectiveness and
  soundness.

## **Council responses**

- Planning Definition: Wiltshire Council has prepared the Plan in line with national planning policy. The
  planning definition of Gypsies and Travellers in the national Planning Policy for Traveller Sites was updated
  in December 2023 to reflect case law which means that persons of ill health, disability, age or those caring
  for family members still meet the definition.
- **Net pitch targets:** Table 3 and 4 in the plan (as updated) can be updated to include pitch supply from planning permissions granted since 1 April 2024.
- **Equality:** The Plan proposes to meet identified need through site allocations and where appropriate windfall sites, consistent with national policy for travellers.

## **Suggested Modifications:**

- Improve clarity: Intensification proposals must meet the requirements in the site allocation policies (where a site is allocated for additional pitches), Policy GT3 and other development plan policy requirements. The approach to safeguarding sites is set out in policy GT2, which states that in addition to those identified in the table, any other site that is subsequently granted permanent planning permission for gypsies and travellers shall be safeguarded in accordance with the policy.
- Include reference to Policy GT3 in Policies GT1 and GT2: Policy GT3 is referenced in Policy GT1 and applies to parts i) to iv). Policy GT2 also references GT3 in the third paragraph in relation to site intensification proposals to meet the need of households that do not meet the planning definition. Policy GT3 and supporting text are clear that it applies to existing sites and new sites.

Table 3.18 Gypsies and Travellers Development Plan Document Safeguarding Gypsies and Travellers and Travelling Showpeople sites main issues

## Policy GT2 (Safeguarding Gypsies and Travellers, and Travelling Showpeople sites)

- Location of sites: Some existing sites are located over 1km away from the nearest pharmacy, as well as other facilities, as well as the potential for increases in vehicular traffic.
- Increase in traffic levels: A number of safeguarded sites under Policy GT2 are adjacent level crossings.
   any development that would materially increase levels of traffic using railway crossings should be refused unless their safety will not be compromised.
- Comprehensive and coordinated approach: Development should take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites. This includes the protection of existing utility assets.
- Clarity on development: Policy GT2 should specify the specific amount of development to be allowed at each specific site.
- Unclear which sites are allocated or safeguarded: Some sites allocated for development are also allocated to be safeguarded
- Intensification: Policy GT2 should make clearer reference to which sites are suitable for intensification.
- Supporting family cohesion: It is unclear how Policy GT2 would support family cohesion.
- **Deletion of policy:** Policy GT2 seeks to propose restrictions on existing sites, particularly 'land at Petersfinger Business Park'. The policy should be deleted alongside any references to safeguarding or protecting sites.
- Additional requirements to mitigate noise pollution: Policies should include provisions requiring developments to provide suitable mitigation of noise pollution.

#### **Council responses**

- Location of sites: The proximity of each site to nearby key facilities was one of the criteria by which each Site was assessed against. Where proposals come forward for development on safeguarded sites, Policy GT3 v. requires development to ensure that the highway network can accommodate vehicles likely to be generated by the development does not result in unacceptable impact on highway safety.
- Increase in traffic levels: Where proposals come forward for development on safeguarded sites Policy
  GT3 v. requires development to ensure that the highway network can accommodate vehicles likely to be
  generated by the site and development does not result in unacceptable impact on highway safety.
- Comprehensive and coordinated approach: The Planning Policy Criteria Review Report states that
  in terms of other significant barriers, statutory agencies and consultation bodies are responsible and
  inform the determination of planning applications. It is considered that development may still be appropriate
  depending on the view of statutory consultees. The National Planning Policy Framework emphasises that
  the focus of plan policies and decisions should be on whether development is acceptable use of land and
  not the control of processes or emissions; and assume that pollution control regimes operate effectively
  (paragraph 194).
- Clarity on development: Safeguarded sites have extant planning permissions which specify the number
  of pitches and plots permitted. Sites also vary in size, as well being subject to unique physical and planning
  policy constraints, which may impact the scope for intensification at each site.
- Unclear which sites are allocated or safeguarded: Policy GT2 sets out the approach to safeguarding sites including a table listing sites. It is the site itself that is safeguarded according to the Policy rather than the specific number of pitches.
- Intensification: The plan allocates existing sites that have an identified need and are suitable in planning terms. The Site Selection Report already qualifies which sites from the Council's perspective are not suitable for more development at this time, but any site could be subject to a proposal in the future, that does meet policy requirements

## Policy GT2 (Safeguarding Gypsies and Travellers, and Travelling Showpeople sites)

- Supporting family cohesion: Intensification of existing sites will allow members of the same family to have their own pitches or plots, without the need to relocate elsewhere. Given the exceptional nature of this, it will be important that conditions are used to manage future use of each site.
- **Deletion of policy:** Policy GT2 does not protect a site indefinitely. It seeks to protect it from change of use so it continues to form part of the supply of sites to meet identified need. If in future there is no identified need for showpeople plots then the site could be subject to a permission for change of use.
- Additional requirements to mitigate noise pollution: Policy GT3 x. requires development to not result in unacceptable levels of noise, air quality and light pollution

Table 3.19 Gypsies and Travellers Development Plan Document new sites and intensification of existing sites main issues

## Policy GT3 (New sites and intensification of existing sites)

- Vehicle access: The Plan needs to ensure that all sites are accessible to all types of vehicle.
- **Transport network:** Policy GT3 should require access to walking and cycling infrastructure as well as public transport would be essential to reduce vehicular trips. The policy should refer to the wider transport network, not only to the highway network.
- **Site constraints and provision of utilities:** The policy should be modified to require a comprehensive and co-ordinated approach to development including respecting existing site constraints and ensure provisions of utilities situation.
- Infrastructure upgrades: Policy GT3 should require developments that 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. This includes ensure adequate provision of water and wastewater infrastructure and proper provision for surface water drainage to ground, water courses or surface water sewer.
- **Communication networks:** Policy GT3 doesn't cover accessibility to communication networks, mobile data and broadband coverage.
- Surface water drainage strategy: The surface water drainage strategy should better align with the
  Wiltshire Core Strategy's sustainable drainage system principles and require a management and
  maintenance scheme, to ensure its long-term durability.
- Well-designed sites: It is unclear how the objective of providing well-designed sites will be met.
- **Impact on residential amenity:** The policy should refer to the potential impacts of nearby uses on the Gypsy and Traveller site.
- Landscape: Policy GT3 should be amended to require the scale of the development to be appropriate
  to ensure that it adequately integrates in the wider village, town or countryside. The scale (and layout) of
  the site should respond positively to the wider settlement pattern and established local character where
  possible.
- **Agricultural land**: Policy GT3 should include a requirement to avoid best and most versatile agricultural, unless no further suitable sites are available.
- Protection of habitats: The policy should require the adequate management and maintenance of buffers
  to protect sensitive habitats and lighting designed to avoid illumination of sensitive habitats to secure their
  long-term life.
- **Site selection criteria:** Clarification required as to why only primary schools considered in site selection criteria.
- Monitoring and management: It is unclear how Wiltshire Council will monitor and manage each site.

## **Council responses**

- **Vehicle access:** Policy GT3 requires safe vehicular and pedestrian access to be provided and maintained for all users including emergency vehicles and refuse collection vehicles.
- **Transport network:** The Planning Policy Criteria Review report sets an appropriate distance to services and facilities which would be acceptable for walking and cycling. Where public transport is unavailable or walking/cycling is not considered safe, school transport can be provided where sites are more than 3.2km away from the nearest school.
- Site constraints and provision of utilities: Policy GT3 covers highway, utilities, drainage. Other on site
  infrastructure that may be in or over the ground would be subject to comments by statutory agencies,
  and operators, at planning application stage, and this would inform the determination of a proposal. Policy
  GT3 requires services to be provided, such as water, power, sewerage and drainage. Where practicable,
  development should connect to the mains, or an alternative acceptable solution can be achieved.

# Policy GT3 (New sites and intensification of existing sites)

- Infrastructure upgrades: This appears to in part repeat Building Regulations. Policy GT3 requires that
  services can be provided, such as water, power, sewerage and drainage. Where practicable, development
  should connect to the mains, or an alternative acceptable solution can be achieved. The surface water
  hierarchy is referred to in the Planning Policy Criteria Review report and is applied by the Council when
  determining the merits of a site.
- Communication networks: There will be many areas within Wiltshire with limited communications
  coverage areas. Whilst this would be desirable, Planning Policy for Traveller Sites does not require access
  to communication networks.
- Surface water drainage strategy: Drainage management and maintenance scheme could be secured by condition but national guidance requires that conditions meet six tests, and where applied they would be enforceable. However it would not be justifiable to generally require this in any planning permission or indeed in planning policy as it cannot be assumed that drainage system would not be maintained by the applicant. Policy GT3 does state that all planning permissions will be subject to conditions. A corresponding proposed change to reference the Council's Drainage Betterment Strategy will be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- Well-designed sites: Good site design will be achieved through setting conditions, and the implementation
  of sites must be done in accordance with approved plans which is a standard condition.
- Impact on residential amenity: Noise, air pollution and light pollution impacts on a Traveller site would be assessed at planning application stage with input from the Council's Environmental Health Team, this is no different from the potential impacts from the traveller site on nearby land uses. Any land uses that may impact on existing or new sites in terms of noise, light and air pollution have been considered in the site assessments.
- Landscape: This is reflected in the landscape and amenity requirements of Policy GT3.
- Agricultural Land: Gypsy and Traveller sites are not considered to be significant development of agricultural land.
- Protection of habitats: Management and maintenance scheme could be secured by condition but
  national guidance requires that conditions meet six tests, and where applied they would be enforceable.
  However it would not be justifiable to generally require this in any planning permission or indeed in planning
  policy as it cannot be assumed that protection of habitats would not be ensured by the applicant. Policy
  GT3 does state that all planning permissions will be subject to conditions.
- **Site selection criteria:** Site availability would be severely constrained given the number of secondary schools in the county.
- Monitoring and management: Wiltshire Council currently manages three Gypsy and Traveller sites, but
  does not manage privately owned sites. This arrangement is anticipated to continue. Section 5 of the
  Plan sets out how the policies will be monitored.

Table 3.20 Gypsies and Travellers Development Plan Document Meeting the needs of Gypsies and Travellers for culturally appropriate accommodation main issues

# Policy GT4 (Meeting the needs of Gypsies and Travellers for culturally appropriate accommodation)

• **Monitoring:** It is suggested that careful monitoring should be undertaken for pitches and households that do not meet the planning definition. This information will inform Policy reviews and the demand for sites.

## **Council responses**

Monitoring: Noted. Section 5 of the Plan sets out how the policies will be monitored.

## Table 3.21 Gypsies and Travellers Development Plan Document emergency stopping sites main issues

# **Policy GT5 (Emergency Stopping Sites)**

Appropriate Assessment Screening: Trusts that Appropriate Assessment screening to ascertain impacts
on internationally protected sites will be a consideration in site selection.

## **Council responses**

Appropriate Assessment Screening: Any additional sites to be identified by 2029 that fall within zones
for relevant designations would be subject to Appropriate Assessment. The requirement for appropriate
assessment at planning application stage is set out in legislation and national planning policy.

# Main issues: Gypsies and Travellers Development Plan Document Section 4

- 3.17 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document section 4, namely:
  - Site Intensification
  - Travelling Showpeople
  - Site Allocations to meet pitch needs from households that do not meet the planning definition
  - New Site Allocations
  - Emergency Stopping Site

# Main issues: Section 4

#### Site Intensification

Table 3.22 Gypsies and Travellers Development Plan Document site intensification main issues

#### Main Issued raised: Site Intensification

## **Policy GT7 Calcutt Park**

• **Flood Zone 2:** Policy GT7 Calcutt Park contains small amounts of Flood Zone 2. Any residential accommodation must not be located within Flood Zones 2 and 3.

## **Policy GT8 Dillons Farm**

- Reference to New Forest Protected Sites: Welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.
- Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.

#### **Policy GT9 Easton Lane**

- **Environmental Permits:** Environmental Permits for discharges may be required for the site. There may be potential drainage restrictions to adhere to.
- Proper management of pollution and contaminants: The developer would need to ensure not to create
  unacceptable risk of pollution from any contamination that might exist. The Environment Agency would
  expect any planning applications to be supported by a risk assessment in line with current guidance. The
  outcome of such assessment would determine the appropriate techniques required to mitigate against
  contamination.
- **National Grid:** National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9).

#### **Policy GT13 The Poplars**

- **Extension of Site:** Concerns raised over the extension of the site and its location between Sand Pit Lane, the railway and the public bridleway.
- Located away from local services: The site is remote from all local services.

## Policy GT15 Land South of Bridge Paddocks

- Existing adjacent Gypsy and Traveller site: This site is located next to a site that is currently occupied by Gypsies and Traveller however is not owned by these families living on the land adjacent.
- Overall need: There is a need for new Gypsy and Travellers pitches for families.

#### **Council responses**

#### **Policy GT7 Calcutt Park**

• Flood Zone 2: Policy GT7 directs development to Pitch 12, which is not affected by Flood Zone 2.

#### **Policy GT8 Dillons Farm**

- Reference to New Forest Protected Sites: Noted.
- Development Height: Noted, development will not reach heights referenced in the comments

## **Policy GT9 Easton Lane**

Environmental Permits: Noted, to be addressed at planning application stage or before.

#### Main Issued raised: Site Intensification

- Proper management of pollution and contaminants: It is acknowledged there may be a need to
  consider a change to the supporting text to Policy GT9 as part of the examination process to address the
  issue of land contamination risk management. To assist this process, a corresponding proposed change
  on land contamination risk assessment will therefore be included within a separate schedule of potential
  changes to help inform the Inspector for their consideration.
- National Grid: The electricity pylons and lines are outside the area identified in the site assessments for development. The site has planning consent.

## **Policy GT13 The Poplars**

- Extension of Site: The site assessment demonstrates that the site could be reconfigured to host the two pitches required. The policy reflects the need for noise assessment and highway improvements. Screening would assist mitigating impacts on the public right of way.
- Located away from local services: This is an existing site with planning permission site is within a few km of Westbury which has all necessary services.

## **Policy GT15 Land South of Bridge Paddocks**

- Existing adjacent Gypsy and Traveller site: Correct, the allocation is on land owned by different families.
- Overall need: Noted.

# Travelling Showpeople

Table 3.23 Gypsies and Travellers Development Plan Document Travelling Showpeople main issues

## Main issues raised: Travelling Showpeople

#### **Policy GT18 Petersfinger Business Park**

- Access: Whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing
  A36 access arrangements, any re-arrangement of the site must ensure that a safe and suitable internal
  vehicular layout is maintained which provides for adequate turning space and safe circulation.
- Flood Zones 2 and 3: Petersfinger Business Park contains small amounts of Flood Zone 2 and 3. Any residential accommodation must not be located within Flood Zones 2 and 3.

## **Council responses**

## **Policy GT18 Petersfinger Business Park**

- Access: This will be addressed through the planning application stage. The site already benefits from approved access.
- Flood Zones 2 and 3: A modification to Policy GT18 will be proposed to clarify that development must be located outside Flood Zone 2 and 3 where they encroach into the site shown on the Policy Map. In considering this issue, an error has come to light with the allocation boundary in Figure 14 and to assist the examination process a potential change has also therefore been identified in the schedule of proposed changes for consideration as part of the examination process.

## Site Allocations to meet pitch needs from households that do not meet the planning definition

Table 3.24 Gypsies and Travellers Development Plan Document site allocations to meet pitch needs from households that do not meet the planning definition main issues

Main issues raised: Site Allocations to meet pitch needs from households that do not meet the planning definition

#### **Policy GT20 Greenfield View**

Site can accommodate allocation: Support the policy as since the Gypsy and Traveller Accommodation
 Assessment interview was conducted a need now exists for two pitches. There is adequate space to
 accommodate them.

## **Policy GT22 Melbourne View**

- Environmental permits: Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.
- Proper management of pollution and contaminants: The Environment Agency would expect any
  planning applications to be supported by a risk assessment in line with current guidance. The outcome
  of such assessment would determine the appropriate techniques required to mitigate against
  contamination.

#### **Council responses**

#### **Policy GT20 Greenfield View**

• **Site can accommodate allocation:** Any planning application will be required to demonstrate the need for the additional pitch and that two pitches can be accommodated.

## **Policy GT22 Melbourne View**

Proper management of pollution and contaminants: It is acknowledged there may be a need to
consider a change to the supporting text to Policy GT22 as part of the examination process to address
the issue of land contamination risk management. To assist this process, a corresponding proposed
change on land contamination risk assessment will therefore be included within a separate schedule of
potential changes to help inform the Inspector for their consideration.

## New site allocations

Table 3.25 Gypsies and Travellers Development Plan Document new site allocations main issues

# Main issues raised: New site allocations

- Brownfield sites: Brownfield sites should be identified in preference to greenfield sites.
- Delivery costs: No delivery costs for Wiltshire Council owned sites have been considered.

## **Council responses**

- **Brownfield sites:** The Site Selection Report includes brownfield sites but they weren't available to be taken forward to the next stage in the assessment process. However, where possible existing sites have been identified to accommodate needs thus reducing the amount of greenfield sites.
- Delivery costs: Land in Council ownership will be leased with all costs of site delivery resting with the leaseholder.

## Policy GT24 Bushton North Farm, Breach Lane, Bushton

Table 3.26 Gypsies and Travellers Development Plan Document Policy GT24 Bushton North Farm, Breach Lane, Bushton main issues

# Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton

#### Highways and Transport (including access)

- Highways safety: Accessing the site is not considered safe for pedestrians due to a lack of walkways
  and an unlit road. Breach Lane is not suitable to accommodate the largest vehicles required to enter or
  exit the site.
- Access to farm: A potential change to the policy will be considered to address the issue of alternative
  access arrangement.

## **Utilities and Drainage**

- Lack of mains sewer connection: Concern over absence of mains sewerage. Due to the proposed site
  being on clay, output from any on-site sewerage treatment plant presents a risk to local ecology. Any
  solution removing foul waste on a regular basis would impact the ongoing site costs.
- Financial implications of drainage and utilities connection: Lack of electricity and mains sewage
  would present a prohibitive cost to development. No evidence that 'the site can enable off-grid power
  supply and off-grid foul drainage', as stated in the document, in a sustainable and ecologically sensitive
  way.
- **Drainage field needed:** If the site had a small sewage treatment plant and it failed, the only possible route for sewage discharge would be the field immediately below the site, the Woodyard business and stabling beyond. The impermeable clay subsoil discounts the possibility of a soak-away arrangement.
- Inadequate existing drainage solution: Land drainage system around Breach Lane is already inadequate with surface water settling on the road even after short periods of heavy rainfall. Due to clay in the area little rainwater permeates the ground and it drains off the land as surface water
- Increase in surface water flood risk: Caravans are particularly vulnerable to flood risk and should be
  located away flood risk areas. The site is poorly drained and prone to groundwater flooding due to soil
  being blue clay based. Hardstanding at the proposed site would speed the run-off of floodwater and would
  likely impact neighbouring fields and businesses. Water runs into a maintained ditch system which leads
  to east side of Bushton village, flooding occurs on a regular basis in two locations on Royal Wotton Bassett
  Road.

## Site Design (including privacy)

• **Impact on character and appearance of the area:** The site is currently greenfield land and the proposal would adversely change the character and appearance of the surrounding area and the amenity of neighbouring properties. The site could be sensitively designed to mitigate any impact.

## Landscape

Impact on the landscape: Development of the site would be detrimentally to the open countryside setting
of the North Wessex Downs National Landscape. Potential light pollution impacts.

### **River Quality and Biodiversity**

- **Impact on ecology and protected species:** The site assessment's biodiversity comments identify impacts on ecology and habitats and high risk area for great crested newts.
- No protections against wildlife: Concerns over lack of control and mitigation to protect local wildlife from damage.

#### Scale

## Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton

• **Site is larger than necessary:** The 0.5 hectares is larger than necessary for this number of pitches. It is not efficient use of land.

#### Other Issues

- Lack of consultation with landowners and tenant farmers: Site assessed without any site visit or consultation of tenant farmer.
- **Financial impacts to tenant farmer:** Proposal will have financial and unsustainable implications on the tenant farmer.
- Loss of good quality agricultural land: Making this site allocation will require grade 2 productive farmland being taken out of production, and possibly adjoining land to accommodate required BNG and sewage treatment facilities.
- Too many sites for the location: With the proposed site, the unauthorised site at land north of 34-49 Clyffe Pypard, two further occupied sites on the Bushton to Calne Road and the proposed transit site at Thickthorn, the number of sites within this location is already excessive.

## **Sustainability Appraisal**

• **Site is incorrectly assessed:** Several of the categories have been incorrectly assessed and the Sustainability Appraisal score should be much lower. The weighting has bias.

#### **Council responses**

## **Highways and Transport (including access)**

- Highways safety: The Site Selection Report assessment states that pedestrian and cyclist access would require these road users to share the carriageway due to the lack of alternative facilities. The highway evidence also confirms that the surrounding highway network is of a suitable geometry to accommodate the size and types of vehicles likely to be generated by the site.
- Access to farm: A potential change to the policy will be considered to address the issue of alternative
  access arrangement.

#### **Utilities and Drainage**

- Lack of mains sewer connection: The evidence in the Site Selection Report assessment confirms that
  there is no flood risk at this site. No evidence has been provided to demonstrate that the effluent from
  foul drainage treatment on site would result in flood risk. The clay soil would preclude use of soakaway
  features. Foul system should either be sealed or small treatment plant should be installed.
- **Financial implications of drainage and utility connection:** Any off-grid solution costs would be borne by the leaseholder provided they are policy compliant and form part of the permitted scheme.
- **Drainage field will be needed:** The permeability of the site will be tested through the drainage strategy required by the policy. A sewage treatment plant does not necessarily need a drainage field.
- Inadequate existing drainage solution: The permeability of the site will be tested through the drainage strategy required by the policy at planning application stage. The evidence in the Site Selection Report assessment suggest that there is no on site flood risk. Where infiltration is not possible on site attenuation would be required as the next suitable technological solution. The highway surface water infrastructure is being reviewed by Wiltshire Council and will need checking and updating where needed to prevent flooding. Culverting would be subject to land drainage consent if required for access.
- Increase in surface water flood risk: The evidence in the Site Selection Report assessment does not identify on-site flood risk. The permeability of the site will be tested through the drainage strategy required by the policy. Where infiltration is not possible, on-site attenuation would be required as the next suitable technological solution. The highway surface water infrastructure is being reviewed by Wiltshire Council to reduce the risk of flooding.

## Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton

## Site Design (including privacy)

• **Impact on character and appearance of the area:** The policy requirements would ensure that the site can be assimilated into the local area, including hedgerow and woodland planting

### Landscape

 Impact on the landscape: The interrelationship with the National Landscape is noted in the assessment but screening through hedgerow and woodland planting would be effective mitigation. Screening through hedgerow and tree planting would be effective mitigation.

## **River Quality and Biodiversity**

- Impact on ecology and protected species: A small number of pitches (three) is proposed and buffers
  to hedgerows will be required. The presence of protected species can be assessed at application stage.
  The mitigation measures identified in Policy GT24 would make the development acceptable in planning
  terms. Great crested newts mitigation can be achieved through district licencing.
- No protections against wildlife: The risk of harm from development to wildlife will be assessed at the
  planning application stage. Mitigation approaches for the species which are likely to occur on site are
  well established.

#### Scale

• **Site is larger than necessary:** There is no requirement in national policy or guidance as to the density of traveller sites. The notional pitch size is at the lower end of the average pitch size in Wiltshire based on the dimensions evidenced in Appendix 1. The remainder of the site requires buffers to hedgerows and some open space remains which is required for other mitigation measures such as drainage fields. Paragraph 4.110 and criterion i. seek to ensure efficient use of land and retention of greenfield land within the site.

### Other Issues

- Lack of consultation with landowners and tenant farmers: The representations made by tenants
  have been considered and responded to. Where appropriate, the Council will engage with tenants to
  discuss any issues raised.
- Financial impacts to tenant farmer: It is acknowledged there may be a need to consider a change to
  the policy as part of the examination process to address the issue of agricultural access to the field to
  enable access at all times.
- Loss of good quality agricultural land: Traveller sites are not considered to be significant development
  of agricultural land. The effects on a working farm were considered at the early stages of the site selection
  process. There is no policy requirement to use 'adjoining land' to accommodate mitigation measures.
- Too many sites for the location: Wiltshire Council's evidence in the Site Selection Report is that there are approximately 25 properties that constitute the nearest settlement so the addition of 2 pitches at Clyffe Pypard if permitted and the 3 pitches at Bushton North Farm do not result in excessive development over and above the number of dwellings (and local residents) in the area.

#### **Sustainability Appraisal**

Site is incorrectly assessed: The Sustainability Appraisal has assessed all potential sites on a consistent
basis against the same set of sustainability criteria. Each site has been assessed taking into account
their individual circumstances and proposals for the site. It is considered that the assessment of Bushton
North is appropriate given available evidence and using professional judgement.

# Policy GT25 Housecroft Farm 1, Bratton Road, Edington

Table 3.27 Gypsies and Travellers Development Plan Document Policy GT25 Housecroft Farm 1, Bratton Road, Edington main issues

# Main issues raised: Policy GT25 Housecroft Farm 1, Bratton Road, Edington

#### **Highways and Transport (including access)**

- **Existing traffic concerns:** Policy GT25 is not an appropriate site due to existing traffic and traffic safety concerns due to commuting.
- Access to agricultural land: Housecroft Farm 1 proposes using an existing agricultural access, which
  is overgrown but still in place. This is the only agricultural access to the Housecroft Estate fields from the
  Bratton Road. While not currently in use, this does not mean that agricultural access will not be required
  from the Bratton Road in future.

#### **Utilities and Drainage**

- Utilities: The cost of installing new utilities for the site would be too high to justify.
- Drainage: The site has poor drainage.

## **River Quality and Biodiversity**

- **Protected species:** Protected species such as owls and bats have been sighted near to the site and the development may affect their habitats. The land provides ecological value.
- Incorrect biodiversity assessment of the site: Incorrect assumptions about the 'low' biodiversity of the Site. Concerns that biodiversity hasn't been properly assessed.
- Lighting impacts: The development will harm the landscape especially from lighting impacts.
- **Hedgerows:** Existing hedgerows have had additional planting of native species to them by farm tenants and therefore the habitat value of the site has not properly been assessed.

#### Other Issues

- Unaware of proposals: Some members of the community were unaware of the plans set out in the Plan.
- **Location:** The site is unsuitably located as there are few nearby key facilities, including health facilities. As well as this, there are a number of existing Gypsy and Traveller sites located nearby.

#### **Council responses**

#### **Highways and Transport (including access)**

- Existing traffic concerns: Visibility splays of 2.4m x 160m are reasonable based on a 50mph speed limit. The site is located on outside of a bend so siting of access will require careful consideration. No highway safety risks have been identified in the Site Selection Report assessment.
- Access to agricultural land: A potential change to the policy will be considered to address the issue of alternative access arrangement.

#### **Utilities and Drainage**

- Utilities: The site would require off grid foul drainage and power.
- **Drainage:** Off grid foul drainage and infiltration of effluents and surface water are possible based on the assessment in the Site Selection Report.

#### **River Quality and Biodiversity**

• **Protected species:** No specifics are provided and the biodiversity section of the Site Selection Report assessment doesn't identify any presence of protected species at the site.

## Main issues raised: Policy GT25 Housecroft Farm 1, Bratton Road, Edington

- Incorrect biodiversity assessment of the site: Given the scale of development and nature of the
  habitats involved, a desk based review is considered appropriate for this site to be allocated in this plan.
  The applicant will be required to submit a full site survey and Biodiversity Net Gain assessment during
  the planning application process. Full mitigation details will also be required at that stage so they can be
  conditioned as necessary.
- **Lighting impacts:** The Site Selection Report assessment acknowledges the rural and exposed location with potential for unacceptable amounts of noise and light pollution but this is amongst other the reason for restricting the development to no more than two pitches.
- Hedgerows: Given the scale of development and nature of the habitats involved, a desk based review
  is considered appropriate for this site to be allocated in this plan. The applicant will be required to submit
  a full site survey and Biodiversity Net Gain assessment during the planning application process. Full
  mitigation details will also be required at that stage so they can be conditioned as necessary.

#### Other Issues

- Unaware of proposals: Reports have been prepared to document the consultation the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.
- Location: The principle that Gypsy and Traveller sites can be acceptable outside settlement boundaries
  is established through national Planning Policy for Traveller Sites and the adopted Wiltshire Core Strategy.
  The site falls within the area of search which is defined using what is deemed a reasonable distance to
  services and facilities. The Bratton surgery is still open and operates. The nearest lawful sites are not
  close to the site.

# Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington

Table 3.28 Gypsies and Travellers Development Plan Document Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington main issues

## Main issues raised: Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington

#### **Highways and Transport (including access)**

• Lack of pedestrian infrastructure: There are a lack of public transport options available close to the site. Some commenters also refer to a general lack of pedestrian infrastructure servicing the site.

## **Utilities and Drainage**

Flood risk and permeability: Local knowledge would indicate that the clay soil on this site has very poor
drainage capability. Water runs from the site either to a nearby ditch or on the roadside. The natural levels
of the land makes the risk of contamination of the nearby Milebourne Brook more likely. Infiltration in the
Winter months would be minimal. The neighbouring land has standing water on it each Winter despite a
comprehensive drainage system. Surface water run off does occur and adds to pollution risk and flooding
risk off neighbouring land.

#### Landscape

 Loss of farmland: Proposal will result in loss of land from farm for grazing. Mitigation will still lead to impacts to this.

#### Other Issues

- Excessive number of existing sites nearby: Too many sites proposed in this local area as well as existing Gypsy and Traveller sites in the area.
- **Wiltshire Climate Emergency Strategy:** The policy does not support the aims and objectives of the Wiltshire Climate Emergency Strategy and is not carbon neutral.
- **Need for monitoring scheme:** No clear monitoring scheme proposed to ensure that occupants of these sites meet the definitions of Gypsies and Travellers.
- Lack of communication of consultation: Some members of the community were unaware of the proposals set out in the Plan. The consultation document is difficult to read.

## Council responses

#### **Highways and Transport (including access)**

• Lack of pedestrian infrastructure: It is accepted that there is no pedestrian infrastructure at the site. The highway assessment in the Site Selection Report does not identify a risk to highway safety.

#### **Utilities and Drainage**

• Flood risk and permeability: The Site Selection Report evidence confirms that there is low/no flood risk at the site (the Site is located wholly within Flood Zone 1, and is at the lowest risk of surface water flooding). Infiltration should be acceptable in this area. There does not appear to be any watercourses nearby that could be used.

## Landscape

Loss of farmland: Traveller sites are not considered to be significant development of agricultural land.
 The impact on the loss of farmland was considered at Stage 4 of the site selection methodology, see
 Table 8 in Site Selection Report.

#### Other Issues

## Main issues raised: Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington

- Excessive number of existing sites nearby: The nearest lawful sites are not close to the site.
- Wiltshire Climate Emergency Strategy: The National Planning Policy Framework states that the planning system should support the transition to a low carbon future in a changing climate. The development could be supplied by renewable energy as set out in Policy GT26 in view of the distance to the nearest power mains.
- Need for monitoring scheme: This can be addressed at planning application stage, setting of conditions
  and also through the terms of the lease i.e. only persons that meet the planning definition in Planning
  Policy for Traveller Sites Annex 1 can occupy the land.
- Lack of communication of consultation: The representations made by tenants have been considered and responded to. Where appropriate, the Council will engage with tenants to discuss any issues raised.

# Policy GT27 Land at Cleverton, Cleverton

Table 3.29 Gypsies and Travellers Development Plan Document Policy GT27 Land at Cleverton, Cleverton main issues

## Main issues raised: Policy GT27 Land at Cleverton, Cleverton

## Highways and Transport (including access)

- **Increase in traffic and pollution:** The site will lead to increased traffic, noise, car fumes, and strain on local resources affecting the quality of life for local residents.
- **Visibility is insufficient**: Further visibility than 160m will be required as vehicles travel 70mph and not 50mph. 160m is not achievable because of road curvature and verge topography. Safe vehicular access cannot be achieved based on distances measured from the access point, which is inconsistent with Policy GT3 (criterion iv) in the Plan.
- Increase in vehicular movements: There may be 600-900 vehicle movements per week from the site onto a fast B-road due to the lack of public transport and the number of on-site residents including teenagers, business vans and lorries etc. On the basis of 80 vehicle trips per day it is highly unlikely that a safe means of vehicular access can be secured to service the site and quantum of development proposed without harm to the local highway network and its existing users.
- No consideration of vehicle trip numbers: Taking into account other types of vehicle movements and teenage children's accommodation needs which the plan doesn't consider, vehicle trips may amount to 90 or more per day.
- Road accident history: Crash map evidence shows 24 no. road traffic incidents over the decade to 2022 in the vicinity, three of which were identified as serious.
- **Pedestrian Access:** No pedestrian infrastructure is available and pedestrian access is not achievable in this location.

#### **Utilities and Drainage**

- Surface-water runoff: Site is located on impermeable clay which will increase surface water runoff. Numerous flooding events have been reported in this local area. Little Somerford has a flooding problem when water washes down from the hill where the site is, this will be exacerbated by effluent run-off from the development as there is no sewer.
- Ditches: Query how will be kept clear of debris to enable free flowing of rainwater drainage.
- **Insufficient sewerage infrastructure:** A sewage treatment plant will fail to function and would result in contamination to the ground both locally and into the River Avon.

#### Site Design (including privacy)

- Sites should be located within existing housing developments: Gypsy and Traveller sites should be
  allocated within large housing developments in Chippenham as done elsewhere for example in Hampshire
  and Berkshire.
- Air quality impacts on surrounding properties and no buffer zones proposed: The property on the
  eastern boundary would be exposed to poor air quality as a result of development. There is no mention
  of buffer zones and separation distances.
- Site will be visible when hedgerows do not leaf: During the six months of the year when the current mature hedgerows and trees are not in leaf, neighbouring properties are in direct line of sight of the proposed site.
- Third Party access rights: Third party access rights affect the land.

#### Landscape

• **Development would be clearly visible:** The development would be clearly visible from the road and nearby footpaths and would substantially alter the character of the area.

# Main issues raised: Policy GT27 Land at Cleverton, Cleverton

- Failure to consider North Wiltshire Landscape Character Assessment: Development would offend CP51as it fails to consider the North Wilts Landscape Character Assessment which identifies a rich evidence of archaeological features and a largely medieval field pattern, local landscape features including mature hedgerows, trees etc.
- Landscaping may not be effective: On site planting may not work given the waterlogged nature of the site and there is no evidence how landscaping will be maintained, or prevent removal in the future.

## **River Quality and Biodiversity**

• **Impact on protected species:** Protected species have been observed in neighbouring properties including great crested newts, their habitats therefore may be impacted by the development, noise and light pollution

#### **Historic Environment**

• Impacts to appearance of village which goes against Conservation Area Statement: Development would have a detrimental effect on the appearance of the village, contrary to the Guidance Recommendations in Little Somerford's Village Design Statement and Conservation Area Statement.

#### **Scale**

- **Impact on the local area:** Development would be inconsistent with national planning policy as the scale of the site will dominate the local area and will result in tensions between communities.
- Scale is unjustified: The scale of the proposal in terms of pitches and population is unsound and
  unjustified when considered against Noise Policy Statement for England because it does not demonstrate
  the effective management and control of environmental, neighbour and neighbourhood noise within the
  context of Government policy.

#### Other Issues

- Lack of engagement with Parish Council: Overall lack of engagement with Little Somerford Parish Council as a neighbouring authority to this allocation.
- Affordable pitches: Small sites should include affordable pitches to address the needs of existing members of the Gypsy and Traveller community resident in the area.

#### **Council responses**

## **Highways and Transport (including access)**

- Increase in traffic and pollution: The Site Selection Report states that the likely trip generation from 10 pitches would not be considered a significant increase in traffic on the surrounding network. While the site is distinctly rural, it is not remote or tranquil and would be unlikely to generate unacceptable levels of light or noise pollution, although the scale of development will be a factor on this locally.
- **Visibility is insufficient:** Any access with the increased use will require the visibility of 2m x 160m to the nearside carriageway edge cleared of obstruction at and above 900m. This should be achievable if the original access is used, and this remains correct. The road is straight at this location so forward visibility of turning vehicles is good.
- Increase in vehicular movements: For a residential site the Highway Authority would usually go upon
  movements of between 8-10 for a house per day. For a traveller site a slight reduction to between 4-6
  movements would be deemed appropriate. This would result at the top end in approx. 60 movements a
  day. The access is off a B-road which in its geometry and capacity is suitable to accommodate these
  types of numbers. The road is straight at this location so forward visibility of turning vehicles is good.
- No consideration of vehicle trip numbers: For a residential site the Highway Authority would usually
  go upon movements of between 8-10 for a house per day. For a traveller site a slight reduction to between
  4-6 movements would be deemed appropriate. This would result at the top end in approx. 60 movements

## Main issues raised: Policy GT27 Land at Cleverton, Cleverton

- a day. The access is off a B-road which in its geometry and capacity is suitable to accommodate these types of numbers. The road is straight at this location so forward visibility of turning vehicles is good.
- Road accident history: According to the Highway Authority's records, there have only been 2 personal
  injury accidents in the last 10 years and nothing in the last 3 years. Within 30m west of the site there has
  been 3 accidents within the last 3 years.
- **Pedestrian Access:** It is accepted that there is no pedestrian infrastructure at the site. The highway assessment in the Site Selection Report does not identify a risk to highway safety.

#### **Utilities and Drainage**

- **Surface-water runoff:** It is acknowledged there may be a need to consider a change to Policy GT27 as part of the examination process to ensure that applicants consider the Wiltshire Council Drainage Betterment Strategy. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- Ditches: Clearance of the ditches is responsibility of the land owners under the provisions of Land
  Drainage Act and riparian ownership responsibility. Lack of maintenance is enforceable under the provisions
  of Land Drainage Act.
- **Insufficient sewerage infrastructure:** The effluent from treatment plants is considered to be free from pollutants and safe to discharge into the ground.

## **Site Design (including privacy)**

- Sites should be located within existing housing developments: The Plan must identify deliverable sites to meet identified accommodation needs. Large housing developments have long lead in times and this would not address a pressing immediate need for new pitches and plots.
- Air quality impacts to surrounding properties and no buffer zones proposed: The policy seeks to
  secure suitable separation distances to neighbouring residential properties, in the interest of safeguarding
  amenity of future residents of the site and neighbouring residents. Effects in relation to air quality and
  other forms of environmental pollution are considered to be neutral.
- Site will be visible when hedgerows do not leaf: Residential amenity is a separate matter to public visual amenity. Sites do not need to be completely screened, but integrated into the landscape in a character supporting way. In this case through recommended standoff buffers to existing residential properties that share a boundary (largely backing onto the site) with the site with a mix of new tree/hedgerow/woodland planting, some of which could include a native evergreen component. It is acknowledged that it would take time to achieve this.
- Third Party access rights: Those rights should already be protected by an easement deed between the
  land owner and the property owners if they are not then they should be. If there is already an easement
  then it would remain in force and if there isn't it's a matter for the property owner and the land owner to
  agree this.

#### Landscape

- Development would be clearly visible: The Site Selection Report assessment states that the site is
  large enough to accommodate on site planting which would be necessary to integrate development into
  this exposed field area in a similar way to existing residential settlement bordering the site and within the
  local area.
- Failure to consider North Wiltshire Landscape Character Assessment: Landscape character has been considered in the Site Selection Report assessment taking into consideration appropriate Landscape Character Assessments.
- Landscaping may not be effective: Soil types and underlying geology inform and influence what species
  of trees and other vegetation would be appropriate to specify within any planting proposals, whether that
  be on the heavier clay soils (more prone to waterlogging) or lighter chalk soils in Wiltshire (more prone

## Main issues raised: Policy GT27 Land at Cleverton, Cleverton

to drought). This is a detailed design matter that will need to be considered in combination with appropriate maintenance and management of planting.

## **River Quality and Biodiversity**

• **Impact on protected species:** The presence of protected species can be assessed at application stage. Mitigation approaches for the species which are likely to occur on site are well established.

#### **Historic Environment**

Impacts to appearance of village which goes against Conservation Area Statement: The site is large enough to accommodate adequate mitigation in the form of buffers and landscaping to ensure that any development will comply with the guidance set out in the Village Design Statement and Conservation Area Statement. The policy requirements ensure that this will be carried forward in due course with a minimum of the site to be developed and clear requirements for good design and landscape mitigation.

#### Scale

- **Impact on the local area:** The separation distance between the existing residential development and the site would minimise the impact if development is located near the existing access to the east. Good design of a site, and mitigation measures, assist in successful integration of development into the surrounding area.
- Scale is unjustified: The site is large enough to devise a scheme that incorporates substantial standoffs
  from neighbouring properties, planting and screening. It is not considered that development of the site
  would contravene extant legislation or policy on noise pollution.

#### Other Issues

- Lack of engagement with Parish Council: Reports have been prepared to document the consultation
  the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes
  involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken
  consultation in accordance with its legislative duties and Statement of Community Involvement, has been
  summarised within this Regulation 22 (1)(c) Consultation Statement.
- Affordable pitches: Affordable sites would have to be rented out on a below market value basis.
   Opportunities to secure funding to support the provision of affordable sites could be explored as part of the delivery of the site.

## Policy GT28 Land at Oxhouse Farm, Rowde

Table 3.30 Gypsies and Travellers Development Plan Document Policy GT28 Land at Oxhouse Farm, Rowde main issues

# Main issues raised: Policy GT28 Land at Oxhouse Farm, Rowde

#### Highways and Transport (including access)

- Unsafe access: Unsafe access as the site is close to a blind bend and opposite a junction.
- Lack of pedestrian infrastructure: There is no pedestrian infrastructure which is unsafe and will increase car usage and traffic.
- Access to farmland: Position of the site will prevent access to another 13 acres of productive farmland.

## **Utilities and Drainage**

- Flooding: Concerns raised in relation to on-site flooding and flooding of the adjacent highway.
- **Sewer capacity:** There are existing problems with sewer capacity. A drainage solution would require substantial investment.

#### Landscape

- **High grade agricultural land:** The land is high grade agricultural land and should not be lost to development.
- **Impact on landscape:** Development will cause light and noise pollution. This would have a detrimental effect, also on the neighbouring National Landscape.

## **River Quality and Biodiversity**

- Impact on habitats: The field is often flooded from October to April most years, this 'winterbourne lake' is the habitat for species of frogs, toads, and newts and it is unclear that the Wiltshire Council inspection of the site covered this period of the year. The brook along the east side hosts water voles.
- **Impact on fauna and flora:** Site development, including hedgerow removal for access, would disrupt and impact on on-site fauna and flora.

#### **Historic Environment**

• Impact on heritage asset: If a bund is included, this could be visible from Oliver's Castle/Roundway Hill from the North Wessex Downs National Landscape.

## Other Issues

Impact on local area: The site would dominate the local area on Devizes Road.

## Council responses

#### **Highways and Transport (including access)**

• **Unsafe access:** This is an existing access which will have a level of existing number of movements. Any residential use of the site will increase movements but it is located far enough into the 30mph speed limit that there is adequate forward visibility for vision of right turning and left turning vehicles. Visibility splays of 2m x 90 should be achievable within the highway. It is recognised that Conscience Lane is close to the proposed access but it is clear that there is good intervisibility between junctions which will allow drivers to be aware of vehicles at each location so there is no significant risk to allowing the arrangement.

## Main issues raised: Policy GT28 Land at Oxhouse Farm, Rowde

- Lack of pedestrian infrastructure: The highway assessment in the Site Selection Report does not
  identify the lack of a footway adjacent the site as a risk to highway safety as there is a footway immediately
  opposite the proposed site entrance.
- Access to farmland: A potential change to the policy will be considered to address the issue of alternative
  access arrangement.

#### **Utilities and Drainage**

- **Flooding:** Opportunities for bespoke infiltration sustainable drainage system and a drainage strategy considering flood risk from surface water may be required. On-site attenuation storage would be required.
- **Sewer capacity:** The sewer is 150m away. As public sewers are available any other non mains discharge methods (small treatment plant) must be consulted with the Environment Agency.

## Landscape

- High grade agricultural land: Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process.
- Impact on landscape: The site lies adjacent to and accessed from the busy A342 Devizes Road, close
  to some existing outlying dispersed linear rural settlement located opposite in the rural gap separating
  Rowde from Devizes. The site, while rural, is not remote or tranquil and would be unlikely to generate
  unacceptable levels of light or noise pollution.

#### **River Quality and Biodiversity**

- **Impact on habitats:** The Site Selection Report assessment states that ecological features can be retained provided the western boundary is adequately buffered and protected. Potential for ground nesting birds and water voles to be considered at planning application stage.
- Impact on fauna and flora: The Site Selection Report assessment and policy requires sufficient mitigation, including provision of 15m wide buffer to western hedgerow / stream secured with substantial fencing to prevent future incursion and planting new hedgerow within buffer to create a habitat corridor. The policy requires secure protection of existing boundary features, erection of fencing and retention of a corridor.

### **Historic Environment**

Impact on heritage asset: Tree planting within new and existing/replanted native perimeter hedgerows
and development offsets from existing field ditches/small tributary watercourse feeding into Summerham
Brook (western site boundary) would be necessary. Additional native tree/woodland planting within the
site and at its corners would help assimilate the site into its wider local countryside context.

#### Other Issues

Impact on local area: The nearest residential properties are opposite the proposed site, numbering
approximately 13 properties. Another 8 properties lie to the north-east of the site on the bend of Devizes
Road. The number of pitches identified would be less than the number of residential properties in the
immediate surrounding area. The development would respect the scale of the local area.

#### Policy GT29 Land at Upper Seagry Farm, Upper Seagry

Table 3.31 Gypsies and Travellers Development Plan Document Policy GT29 Land at Upper Seagry Farm, Upper Seagry main issues

#### Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry

#### Highways and Transport (including access)

- Pedestrian safety: Access to local bus stop and village requires walking along the road which has no
  footpath, no street lighting, is on a bend in the road and at national speed limit, thus increasing the risk
  of accidents. Suggest policy changes to provision street lighting, footpath and removing a substantial
  length of hedgerow.
- Highways safety: Narrow lanes to and from site are used for heavy and large agricultural vehicles.
- **Visibility splay:** Limited sight line from the entrance on a national speed limit road, despite the proposed removal of hedgerow. This increases the risk of accidents.

#### **Utilities and Drainage**

- **Drainage:** The underpinning evidence in the Site Selection Report states that the site should be developed for no more than five pitches.
- **Sewerage run-off:** Sewerage provision will cause polluted run-off into the local environment and worsen biodiversity quality.
- **Sewage back-up:** Sewage must have emergency overflows to cover for breakdown or power failure. These can only be routed to the above waterway.
- Flood risk and drainage: The Plan acknowledges that there is evidence of high groundwater, and there
  is a lack of drainage infrastructure which has caused flooding in the village and near the site. Pitches will
  compact the soil reducing its ability to adsorb water, resulting in increased runoff, erosion, loss of fertile
  topsoil. This will impact drainage patterns.
- **Electricity and water connection:** Electricity and water mains are not on site, so it would be a significant cost to install this infrastructure.
- **Renewable energy:** Site is unlikely to have a positive effect regarding the generation of energy from renewable sources as there would be insufficient supply for cooking.

#### **Site Design (including privacy)**

• **Proximity to Seagry Village Hall:** Site is adjacent to Seagry Village Hall. Any hedge planted would take years to mature to provide privacy.

#### **River Quality and Biodiversity**

- **Impact on ecology:** There is potential presence of great crested newts and several other species that use the pond as a water source so would be prevented access by development of this site. There are insects, birds, deer and bats which will be impacted by the site placement.
- **Disturbance of bats:** There has not been an assessment of bat populations that could be disturbed by development.
- Oak tree: Oak Tree is subject to a Tree Preservation Order which will be affected by the site.

#### **Historic Environment**

• **Development on agricultural and historical land:** Development could cause irreversible damage to agricultural land with historical and cultural value (through the presence of a medieval ridge).

#### Other Issues

#### Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry

- **Inappropriate location:** The site is in proximity to Upper Seagry, which is a small village and an unsuitable location for development.
- **Impact on farming:** The site is on Grade 2 agricultural land and development impact the operation of the current farming use cattle. The tenant was not informed by Wiltshire Council. The existing access is needed by the farmer and a new access will be required for the development.
- **Policy wording:** Inconsistencies in policy wording. Policies GT30, GT26 and GT24 all state 'no more than x gypsy traveller pitches', whereas Policy GT29 states the site 'is allocated for the development of 5 gypsy and traveller pitches'. Limitation of 'no more than' should be added to policy wording.

#### Sustainability Appraisal

• **Environmental impact:** The statement that the site is of neural impact is inconsistent with the Plan. Adverse effects will arise from the removal of hedgerows, vehicular pollution (due to increased private car ownership), noise and light pollution.

#### Council responses

#### **Highways and Transport (including access)**

- **Pedestrian safety:** The Site Selection Report identifies that access by pedestrians and cyclists would be achievable by sharing the carriageway.
- Highways safety: The Site Selection Report assessment states that the access roads leading to the site
  are of acceptable geometry to accommodate the vehicles likely to be generated by the site.
- Visibility splay: A suitable visibility splay can be achieved within the adopted highway but it may require
  some setting back of the hedgerow to the south to achieve visibility beyond 60 m and the 30 mph sign
  entering the village. Any new access toward the centre of the site or south of the northern field access
  will likely require more hedgerow set back to achieve a suitable visibility. Further discussions with the
  tenant farmer will be had to agree a suitable solution that preserves the existing agricultural access.

#### **Utilities and Drainage**

- Drainage: Table 11 in the Site Selection Report notes the drainage requirements and states that
  development should be restricted to no more than five pitches. It is acknowledged there may be a need
  to consider a change to Policy GT29 as part of the examination process to clarify that development should
  be restricted to no more than five pitches. To assist this process, a corresponding proposed change will
  therefore be included within a separate schedule of potential changes to help inform the Inspector for
  their consideration.
- **Sewerage run-off:** There is no evidence on this. If a sewer connection cannot be achieved, off-grid foul drainage would be required in the form of package treatment plants which treat fouls to an acceptable standard effluent that can be discharged into a watercourse or into the ground by way of infiltration if on site geology permits.
- **Sewage back-up:** If a sewer connection cannot be achieved, off-grid foul drainage would be required in the form of package treatment plants which treat fouls to an acceptable standard effluent that can be discharged into a watercourse or into the ground by way of infiltration if on site geology permits.
- Flood risk and drainage: High groundwater does not mean that the site cannot be developed. Means
  of discharge is limited with infiltration likely to be limited by the high groundwater. There are watercourses
  to the east of the site which could be utilised to deal with the surface water runoff from the. Policy GT29
  identifies the need to provide sufficient drainage measures to manage surface water, groundwater and
  foul water drainage.
- **Electricity and water connection:** Mains water is available within 5m of the site according to the Site Selection Report assessment. Mains power would require wayleave consent. In the case of refusal this would necessitate the installation of off-grid power generation.
- Renewable energy: Occupants should achieve renewable and low carbon power supply where possible.

#### Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry

#### Site Design (including privacy)

Proximity to Seagry Village Hall: Physical agricultural land separation remains between proposed site
and village hall site. New hedgerow and hedgerow tree planting along the sites southern boundary would
reduce intervisibility between the site and village hall over the medium term.

#### **River Quality and Biodiversity**

- **Impact on ecology:** The Site Selection Reprot advises that the pond in the north-west corner of the site may contain great crested newts, survey required, therefore a licence may potentially be required. The applicant will be able to apply for district level licensing whereby mitigation is provided by a third party at another location.
- **Disturbance of bats:** The impact of development on any potential bat habitats will be assessed during the planning application stage. Key habitats for bats are likely to be the hedgerows and pond which can be retained and protected through a mitigation scheme secured by condition.
- Oak tree: There is no Tree Preservation Order for the oak tree, but the site entrance can be adjusted to retain any such trees.

#### **Historic Environment**

• **Development on agricultural and historical land:** The Site Selection Report assessment identifies no evidence of historical or cultural value.

#### Scale

 Site size and mitigation measures: The buffer requirements were considered in Appendix 1 to the Site Selection Report and the land area identified in the Plan is sufficient to accommodate buffers.

#### Other Issues

- **Inappropriate location:** Gypsy and Traveller sites are an exception to the principle that residential development must be located within settlement boundaries. The Site Selection Report identifies an evidenced area of search within which available sites would could be assessed.
- Impact on farming: The Site Selection Report assessment considers that this allocation would not have
  a detrimental effect on the operation of a working farm. While land of poorer agricultural quality would be
  preferred for development, such sites did not advance to the allocation stage for planning reasons. The
  council is investigating alternative access arrangements for the site. A potential change to the policy will
  be considered to address the issue of alternative access arrangement.
- Policy wording: Table 11 in the Site Selection Report notes the drainage requirements and states that
  development should be restricted to no more than five pitches. It is acknowledged there may be a need
  to consider a change to Policy GT29 as part of the examination process to clarify that development should
  be restricted to no more than five pitches. To assist this process, a corresponding proposed change will
  therefore be included within a separate schedule of potential changes to help inform the Inspector for
  their consideration.

#### **Sustainability Appraisal**

• **Environmental impact:** Policy GT29 identifies measures designed to avoid impacts on existing hedgerows; plant new hedgerows and secure mitigation for protected species based on the evidence available.

#### Policy GT30 Land at Whistley Road, Potterne

Table 3.32 Gypsies and Travellers Development Plan Document Policy GT30 Land at Whistley Road, Potterne main issues

#### Main issues raised: Policy GT30 Land at Whistley Road, Potterne

#### Highways and Transport (including access)

- Existing heavy traffic and congestion: Whistley Road is suffering from heavy traffic and congestion.
- Footpath safety concerns: If footpath is retained, users will feel intimidated.
- **Highways safety:** Whistley Road is a narrow single-lane highway and cars use driveways to pass each other. There is limited visibility. There is no street lighting and no footpath.

#### **Utilities and Drainage**

- **Exacerbating flood risk:** The fields on and around the site are prone to flooding which also affects the road. Hardstanding would increase water run off towards properties and the frequency and severity of flooding. The ground on the site is poorly drained.
- Odour consultation zone: The site is within the Odour Consultation Zone of the Potterne Wastewater Recycling Centre. Preliminary Odour Risk Assessment indicates that there is a slight adverse to medium adverse effect. Tests should be undertaken to predict the likelihood of future residents experiencing poor amenity.

#### Site Design (including privacy)

- **Site doesn't comply with design requirements:** The site does not comply with design requirements for Gypsy and Traveller sites as per 2008 Designing Gypsy and Travellers Sites A Good Practice Guide.
- Hedgerow removal: Development would require removal of significant section of hedgerow.
- Noise pollution: Noise pollution is a concern for residents, given the open nature of the fields.

#### Landscape

• **Unacceptable landscape harm:** Development would result in unacceptable harm to the landscape character of Whistley Road and the setting of the village and to the character and appearance of the area.

#### **River Quality and Biodiversity**

- Damaging impacts: The effects this site would have on important wildlife is both irresponsible and damaging.
- Land is of ecological importance: The land is of ecological importance in the rural setting, with an ancient and well-established hedge and old wall along the full boundary length of the road.
- **Protected species:** Site assessment's biodiversity comments identify impacts on ecology and habitats and high risk area for great crested newts.

#### **Historic Environment**

Increase in traffic would contravene the Conservation Area: Increase in traffic from the site will be
in contravention of the Potterne Conservation Area Statement 2002 which identifies traffic as a key issue.
It states that efforts will need to be made to protect the special character of the village to ensure its long
term survival for the benefit of existing and future residents, businesses and visitors.

#### Other Issues

• **High agricultural value land:** The land is of high agricultural value with fertile soil and should not be developed for this reason.

#### Main issues raised: Policy GT30 Land at Whistley Road, Potterne

- Consultation period was too short: Representor submits that the consultation period is too short and should have adhered to Government advice in the Gunning principles. i.e. 12 weeks.
- Lack of key facilities: Lack of amenities, no Doctors surgery, no school and only a small shop. The bus
  service is light and would require complete reliance on cars, ease of access to such facilities from this
  site is unsuitable.
- Salisbury Plain Special Protection Area buffer zone: The site is within 6.4km buffer of Salisbury Plain Special Protection Area and a greenfield site question if impacts can be mitigated.
- Procedural impropriety: The Plan also appears to meet the threshold of procedural impropriety in the
  numerous examples detailed above where Wiltshire Council has failed to adhere to the National Guidance,
  stated incorrect assessments based on flawed evidence and failed to submit evidence to support its
  subjective decisions. In conclusion, the Plan is not legally compliant and fails to meet the test of Soundness
   it is not justified, effective, nor consistent with national policy.

#### **Sustainability Appraisal**

- Objective 1: Site should be left in natural state for biodiversity purposes.
- Objective 2: Land should be preserved for food production.
- Objective 3: No existing water or sewage connections.
- Objective 4: Adverse environmental impacts.
- Objective 5: Development will increase flood risk on road.
- Objective 6: Need assurances of sustainable construction practices.
- Objective 7: There are many sites of archaeological significance close to the site.
- Objective 8: The adverse effect should be major because numerous buildings would be proposed.
- Objective 11: Lack of public transport.
- Objective 12: The assessment is wrong because Potterne Primary School is closed.

#### Council responses

#### **Highways and Transport (including access)**

- Existing heavy traffic and congestion: If a small number of pitches are provided then the road network should be able to accommodate 8-10 movements a day without significant detriment.
- **Footpath safety concerns:** Policy provides for new tree planting and hedgerows around the site that would screen the footpath.
- **Highways safety:** The lack of pedestrian infrastructure is acknowledged in the Site Selection Report and the restriction of the allocation to no more than two pitches.

#### **Utilities and Drainage**

- Exacerbating flood risk: The subsurface is potentially suitable for infiltration sustainable drainage system, although the design will be influenced by the ground conditions. The site drainage will be required to be designed around flood risk and without increasing flood risk elsewhere. Flooding will need to be investigated as part of the application submission and drainage strategy.
- **Odour consultation zone:** Further technical evidence consistent with the advice from Wessex Water would be required to support development of this site. However, as the site is no longer available for development, this has not been given further consideration.

#### **Site Design (including privacy)**

#### Main issues raised: Policy GT30 Land at Whistley Road, Potterne

- Site doesn't comply with design requirements: It is considered that the sustainability appraisal of this
  site has adequately assessed likely effects of developing this site using available evidence sources and
  professional judgement.
- Hedgerow removal: It is possible to replant a new characteristic roadside hedgerow on an adjusted
  alignment, but this is likely to require hedgerow removal and replanting that extends beyond the frontage
  boundary limits of the site.
- **Noise pollution:** The site assessment evidence acknowledges the reduced sense of privacy and potential increase of noise and light but not to a degree that it would result in discounting the site.

#### Landscape

 Unacceptable landscape harm: The Site Selection Report assessment does not identify harm to the National Landscape or its setting. Replanting of hedgerows can address any harm to local landscape character.

#### **River Quality and Biodiversity**

- **Damaging impacts:** Policy GT30 identifies required mitigation to make the site acceptable in planning terms.
- Land is of ecological importance: This is noted in the Site Selection Report and the site must accommodate no more than two pitches near the road access to avoid impacts on the hedgerows within the interior of the site.
- Protected species: The risk of harm from development to wildlife will be assessed at the planning application stage. Mitigation approaches for the species which are likely to occur on site are well established.

#### **Historic Environment**

Increase in traffic would contravene the Conservation Area: Development will be required to avoid
or minimise harm to the significance of designated and non-designated heritage assets, including by
development within their setting.

#### Other Issues

- High agricultural value land: Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process.
- Consultation period was too short: Noted. There is a minimum consultation length requirement of 6 weeks which has been exceeded. The consultation took place between 20 August and 4 October 2024.
- Lack of key facilities: The site falls within the area of search which is defined using what is deemed a reasonable distance to services and facilities.
- Salisbury Plain Special Protection Area buffer zone: A potential change to Policy GT30 to address this could be considered. However, as the site is no longer available for development, this has not been given further consideration.
- **Procedural impropriety:** The Council has consulted on a Plan it considers sound, and justified by its evidence, and any objections will be considered through public examination.

#### **Sustainability Appraisal**

It is considered that the sustainability appraisal of this site has adequately assessed likely effects of developing this site using available evidence sources and professional judgement. However, it is acknowledged that Potterne Primary School is closed and the Sustainability Appraisal should have referred to the nearest primary school being in Devizes, not Potterne, which is approximately 3.5 km from the site. This is within

#### Main issues raised: Policy GT30 Land at Whistley Road, Potterne

the 6km distance in the site selection methodology that is used when considering access to primary schools. Further information about this is in the Planning Policy Criteria Review report that was published alongside the draft Plan.

#### Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham

Table 3.33 Gypsies and Travellers Development Plan Document Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham main issues

#### Main issues raised: Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham

#### **Highways and Transport (including access)**

- **Highway safety:** The site proposes safety risks as it is located on a 60mph road and there is no pavement or street lighting.
- **Site access:** Access to A3102 is not accessible. Entrance is via narrow country lanes which have speed bumps, awkward turns, vegetation overgrowth and are often flooded.

#### **Utilities and Drainage**

- **Flood risk:** Increase of flood risk in the immediate surrounding area, due to evidence of medium/ high groundwater risk on site. This will have multiple impacts. The installation of hard standing will also cause challenges for site drainage.
- Drainage infrastructure: Additional residents will put pressure on drainage infrastructure and watercourses.
- Access to infrastructure: No access to water, sewerage, electricity or gas. There is no electricity supply
  running past the site and nearest mains sewer is over 2km away, the provision of this infrastructure will
  be expensive.
- **Surface and groundwater quality:** Pitches on this site will adversely affect surface, ground and drinking water quality/quantity due to information presented above.

#### Site Design (including privacy)

• **Impact on residential amenity:** Concerns over potential impact on residential amenity resulting from increased levels of noise, air and light pollution.

#### Landscape

• Adverse impact on the surrounding landscape: The site's basic facilities will not be temporary which will change the character of the rural area.

#### **River Quality and Biodiversity**

• **Biodiversity Net Gain:** The proposal will result in adverse impacts on the biodiversity of the existing agricultural field as it may not be possible to deliver Biodiversity Net Gain on the site.

#### Other Issues

- Access to farm: Site allocation will block access to 26.77 acres of agricultural land for the tenant. This
  will subsequently impact their farming business. Loss of the best and most versatile grade 2 agricultural
  land.
- **Informing tenants:** Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm.
- Brownfield sites: Not all brownfield options have been included in the site assessments.

#### **Council responses**

#### **Highways and Transport (including access)**

#### Main issues raised: Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham

- Highways safety: The Site Selection Report assessment states that the access roads leading to the site
  are of acceptable geometry to accommodate the vehicles likely to be generated by the site.
- Site access: There is an existing access which has operated without any highway safety issues, personal
  injury accident data for the location does not indicate a safety issue. The surrounding highway network
  is of a suitable geometry to accommodate the size and types of vehicles likely to be generated by the
  site.

#### **Utilities and Drainage**

- **Flood risk:** The Emergency Stopping Place site selection report notes that the site is in a medium/high area of groundwater risk meaning that infiltration may be difficult. Other than the groundwater risk the site does not have any outstanding flood concerns and should be able to be drained. If infiltration tests return poor results, on-site attenuation storage would be required.
- **Drainage infrastructure:** The site does not require mains connection due to its temporary use. The Emergency Stopping Place Strategy and the Plan (at paragraph 3.49) explain that emergency stopping sites are basic sites with limited facilities equipped with hardstanding, fence, and rubbish disposal as a minimum but portable toilets, water and sewage disposal could also be made available, consistent with Government advice.
- Access to infrastructure: The site does not require mains connection due to its temporary use. The
  Emergency Stopping Place Strategy and the Plan (at paragraph 3.49) explain that emergency stopping
  sites are basic sites with limited facilities equipped with hardstanding, fence, and rubbish disposal as a
  minimum but portable toilets, water and sewage disposal could also be made available, consistent with
  Government advice.
- Surface and groundwater quality: The drainage evidence confirms that technical solutions in the form
  of on-site attenuation should be pursued if infiltration cannot be achieved. It is considered that this would
  address any flood risk on site without increasing it anywhere else in accordance with national planning
  policy and guidance.

#### Site Design (including privacy)

• **Impact on residential amenity:** On site mitigation measures will assist screening the site to limit the impacts on the surroundings. Any engagement in hostile behaviour would be a civil matter.

#### Landscape

 Adverse impact on the surrounding landscape: Policy 31 requires the provision of additional hedgerows and additional tree/copse planting to mitigate landscape impacts from the development.

#### **River Quality and Biodiversity**

Biodiversity Net Gain: The Emergency Stopping Sites report assessment states states that the field is
improved and of low biodiversity value. Depending on the number of pitches, meeting the Biodiversity
Net Gain requirements may not be achievable on-site, therefore off-site delivery may be required.

#### Other Issues

- Access to farm: A potential change to the policy will be considered to address the issue of alternative
  access arrangement.
- **Informing tenants:** The Council remedied this by communicating directly with tenants the week after the Cabinet report was published. The Council accepts that this should have been handled better to avoid this situation
- Brownfield sites: The Emergency Stopping Sites assessment considers sites within the extended areas
  of search that were considered available, but also sites ruled out for permanent traveller sites. No brownfield
  sites were considered available for this use.

# Main issues: Gypsies and Travellers Development Plan Document Sustainability Appraisal

3.18 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document Sustainability Appraisal.

#### Main issues: Section 5

Table 3.34 Gypsies and Travellers Development Plan Document section 5 main issues

#### Main issues raised: Sustainability Appraisal

- **Plan is not sound:** The Plan is not sound and scores poorly against Sustainability Appraisal objectives, Objective 2 of the Plan and national guidance regarding the location of such sites.
- Sustainability of the plan: The sustainability of this Plan is unsatisfactory.
- Limiting open-countryside development: Local planning authorities should very strictly limit new
  development in open countryside that is away from existing settlements or outside areas allocated in the
  development plan. They should ensure that sites in rural areas respect the scale of and do not dominate
  the nearest settled community and avoid placing an undue pressure on the local infrastructure.

#### **Council responses**

The Sustainability Appraisal has assessed the likely effects of the Plan using available evidence sources and professional judgement in accordance with the relevant legislation and guidance.

## **Appendix 1**

#### Introduction

- 4.1 This appendix is intended to address how the requirements of Regulation 22(1)(c) (i) to (iv) have been met and sets out:
  - Which bodies and persons the local planning authority invited to make representations under Regulation 18
  - ii. How those bodies and persons were invited to make representations under Regulation 18
  - iii. A summary of the main issues raised by the representations made pursuant to Regulation 18
  - iv. How any representations made pursuant to Regulation 18 have been taken into account.
- 4.2 In addressing how these legislative requirements have been met this appendix will also, in part, signpost to other reports that have been prepared to demonstrate legislative conformity.
- 4.3 Public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 took place over eight weeks from 13 January to 9 March 2021<sup>18</sup>, on the proposed scope and content of the Gypsies and Travellers Development Plan Document (the Plan). Overall, more than 45 representations were made from circa 44 people and organisations. In addition, more than 1,300 people attended the live consultation events held as part of the consultation.

## Structure of Appendix 1

- 4.4 Section 2 of this Appendix sets out which bodies and persons were consulted and how that was undertaken.
- 4.5 Section 3 of this Appendix provides links to the reports that provide further information and summarise the main issues raised in response to the consultation and the response of the Council indicating how the comments were taken into account in the next stage of Plan preparation.
- **4.6** Section 4 of this Appendix sets out a conclusion on the efficacy of the Regulation 18 consultation process.

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In accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England)
Regulations 2012
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## Regulation 18: How consultation was undertaken

### Who was consulted and how was this undertaken?

- Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council's 4.7 adopted Statement of Community Involvement (SCI)<sup>19</sup> and Temporary Arrangements<sup>20</sup> The temporary arrangements document represented a response to guidance<sup>21</sup> to Local Planning Authority's to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19. 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. The Council could instead comply with Regulation 35(1)(a) by making development plan documents available on their website.
- 4.8 A wide range of methods were used to raise awareness about the consultation and to encourage people to respond, these methods ensuring they reached stakeholders including:
  - 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 had previously requested to be informed about updates relating to Wiltshire planning policy.
- 4.9 The methods used for contacting people included those outlined within Table 4.1

Statement of Community Involvement, Wiltshire Council (July 2020) 19

Statement of Community Involvement Temporary arrangements, Wiltshire Council (July 2020) 20

Planning Practice Guidance: Plan Making https://www.gov.uk/guidance/plan-making (Paragraphs 077 and 078)  $Page \ 553$ 

## Table 4.1 Lists various means by which consultees were made aware of the Gypsies and Travellers Plan consultation at Regulation 18

#### **Consultation method**

Notification emails sent to Spatial Planning mailing list (circa 1,500 recipients on mailing list)

Notification letters sent to Spatial Planning mailing list (circa 78 recipients on mailing list requested postal notifications)

Inclusion within Wiltshire Council email newsletter sent to residents (circa 23,000 recipients on mailing list)

Inclusion within Wiltshire Council email newsletter sent to two stakeholder mailing lists (circa 1,500 recipients on mailing list)

Inclusion within newsletter sent to Wiltshire Council members (98 recipients on mailing list)

Inclusion within newsletter sent to Wiltshire town and parish councils (circa 250 recipients on mailing list)

Social Media (reach 764,775) 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).

Public Notice placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.

Press releases: A series of press releases were released and placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town and Parish councils along with local/regional and some national media.

Spatial Planning online events: The consultation on the Gypsies and Travellers DPD was also advertised during 17 online consultation events for the Wiltshire Local Plan Review.

- 4.10 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 associated with each consultation paper. 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.
- 4.11 A more detailed breakdown of how consultation was undertaken and who responded can be found within the consultation report<sup>22</sup> that was produced to document the process and findings of this consultation.

## Regulation 18: Main issues raised and Council consideration

- **4.12** A summary of the main issues raised as part of the Wiltshire Gypsies and Travellers Plan consultation is provided within section 6 of the consultation report<sup>23</sup> published following the consultation. Further detail on how this consultation helped to shape and inform the timeline of the Plan is included within section 2 of this report, documenting the plan production timeline.
- **4.13** Summary of actions arising from the consultation:

<sup>22</sup> Gypsies and Travellers Development Plan Document Consultation Report (2021)

<sup>23</sup> Gypsies and Travellers Development Plan Document Consultation Report (2021)

- 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 stopping sites.
- Gathering evidence on pitch delivery and preferred products.

#### **4.14** A response to each action point is set out below.

- The GTAA was updated during the preparation of the Plan, including in 2022 and most recently 2024 (with a base date of 1 April 2024). The GTAA has informed the setting of pitch targets for gypsies and travellers and plot targets for travelling showpeople in the Plan.
- Engagement with neighbouring authorities and prescribed bodies is set out in the Duty to Cooperate Statement published alongside the Regulation 19 consultation version of the Plan and has informed Plan preparation. Where appropriate, the Council will prepare Statements of Common Ground with neighbouring authorities and prescribed bodies.
- The Council effectively operates a tolerating approach to unauthorised encampments as set out on its website1. Provision of emergency stopping sites will assist to accommodate transient groups in a safe location if they cannot be tolerated where the encampment has first occurred. In terms of private transit pitches, it would be more appropriate for site owners to apply for planning permission for one or more permanent pitches that can be occupied by visitors or family members as and when required. This need not be a fully developed pitch with a dayroom but could be simple with few facilities to enable short-term stay.
- Policy GT3 and Policy GT5 now set out the criteria proposals for new permanent sites and emergency stopping sites must meet. The criteria review is documented in the Planning Policy Criteria Review report (August 2024) and the Emergency Stopping Sites Site Selection Report (August 2024) published alongside the Regulation 19 consultation version of the Plan.
- Policy GT5 in the Plan, and its supporting text, detail the approach to planning and delivery of new emergency stopping sites. A capital budget is in place to construct the first allocated site at Thickthorn Farm GT31. Revenue budget will be identified to cover the ongoing maintenance of this site. Additional sites will be identified and delivered by 2029 in accordance with Policy GT5. The 2018 Emergency Stopping Places Strategy will be updated as necessary to include more detail on site management and maintenance.
- The Delivery Section of the Site Selection Report published alongside the Regulation 19 consultation version of the Plan contains the information on pitch deliverability and preferred products for allocated sites in Council ownership. The preferred product is long leasehold with no services. On private land allocated for new sites, it is within the landowner's gift to decide if they wish to deliver them or if they would be sold. The Council will engage with private landowners of sites (Policies GT27 and GT30) to confirm the preferred option for site delivery. Where the plan allocates additional pitches and plots at existing traveller sites some of the landowners have submitted representations in support of the respective plan policy. It is expected that additional pitches or plots can be delivered at the expense of the owner/applicant.

### Conclusion

4.15 The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out within the Council's Statement of Community Involvement at the time of each consultation. A link has been provided to the summary and full reports of the main issues raised by the representations made pursuant to Regulation 18, and explanation provided of how these were taken into account in the preparation of the Gypsies and Travellers Plan. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

## **Appendix 2**

#### Introduction

- 5.1 This appendix addresses the requirements of Regulation 22(1)(c)(v):
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations.
- 5.2 In July 2024, Wiltshire Council's Cabinet (15 July 2024) and Full Council (24 July 2024) approved the Wiltshire Gypsies and Travellers Development Plan Document Pre-submission Draft for publication in line with Regulation 19. The proposed submission Regulation 19 version of the draft Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 of the TCPR for a consultation period running from Tuesday 20 August to Friday 4 October 2024. The consultation represented an opportunity for all interested parties to have their say on the proposals. This Appendix is intended to set out who was consulted and how this was undertaken alongside providing information on the response to the consultation and the main issues raised. Schedule 1 of this Appendix provides further examples of the publication/notification materials produced.
- 5.3 The information contained within this appendix explains which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations<sup>24</sup> and the Council's Statement of Community Involvement<sup>25</sup>. This Appendix also sets out the number of representations made pursuant to regulation 20 whilst the report as a whole summarises the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

## Regulation 19: Who was consulted and how was that undertaken?

- In accordance with the Statement of Community Involvement<sup>26</sup> and the legislative criteria governing the regulatory stages of plan making<sup>27</sup>, notifications were sent inviting comments on the draft Gypsies and Travellers Development Plan Document that included the following organisations, groups and individuals being contacted:
  - Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and, Highways England)
  - · Neighbouring local authorities
  - All parish and town councils

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

<sup>25 &</sup>lt;u>Statement of Community Involvement</u>, Wiltshire Council (July 2020)

<sup>26</sup> Statement of Community Involvement, Wiltshire Council (July 2020)

<sup>27</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012

- Wiltshire Councillors
- Individuals, community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy and the Wiltshire Gypsies and Travellers Development Plan Document.
- 5.5 Consultees were made aware or formally notified of the consultation through a variety of means as outlined within Table 5.1

Table 5.1 Lists various means by which consultees were made aware of the Wiltshire Gypsies and Travellers Regulation 19 consultation

Consultation method	Further information
Notification email or letter sent to those on Strategic Planning mailing list (over 7000 emails or letters sent to recipients on mailing lists)	Notification sent to consultee's and organisations on Strategic Planning mailing list including those who have requested to be kept informed of the progress of the Gypsies and Travellers Development Plan as the plan has progressed.  The initial notification email contained information with regards the local plan, how to respond and the availability of documents (linking to the webpage) whilst also attaching copies of both the public notice and statement of representation procedure.  • Email notification sent 14/08/2023 is provided at Schedule 1 of this Appendix.
Notification letter and leaflet sent to Gypsies and Travellers, and Travelling Showpeople (over 400 letters and leaflets sent)	Notification sent to all sites within the County with an accompanying leaflet explaining the consultation and how to respond.
Inclusion within Wiltshire Council email newsletter sent to residents (over 27,000 recipients on mailing list)	Information advising residents of the consultation was included within newsletters sent to residents on the mailing list five times between the dates 26/07/24 and 20/09/24.  • Email newsletter sent 20/08/2024 is provided at Schedule 1 of this Appendix
Inclusion within email newsletter sent to Wiltshire Council members (over 100 recipients on mailing list)	Information advising Wiltshire Council members of the consultation was included within newsletters sent to members on the mailing list four times between the dates 26/07/24 and 20/09/24.

Consultation method	Further information
	The full list of events were contained within the emails.
Inclusion within email newsletter sent to Wiltshire town and parish councils (over 240 recipients on mailing list)	Information advising Wiltshire Council town and parish councils of the consultation was included within newsletters sent to all town and parish councils three times between the dates 26/07/24 and 20/08/24.  • Email newsletter sent 20/08/24 is provided at Schedule 1 of this Appendix. The full list of events were contained within the email.
Social Media (reach 47,300)	Information advertising the consultation was shared across 21 posts in total, 12 on Facebook and 9 on X (formally Twitter) between 20/08/24 to 18/10/24. This facilitated 783 clicks to the consultation webpage and had a reach of 47,300.
Public Notice	Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.  • The public notice published during week commencing 12/08/24 can be viewed at Schedule 1 of this Appendix.
Press releases	A series of press releases were issued advertising the Wiltshire Gypsies and Travellers Development Plan consultation, namely:  • 25/07/2024 "Wiltshire's Gypsies and Travellers Development Plan moves to the next stage – with public consultation to begin in August" [available to view via this link]  [Press release provided at Schedule 1 of this Appendix]  • 15/08/2024 "Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week" [available to view via this link]

Consultation method	Further information
	[Press release provided at Schedule 1 of this Appendix]
	20/08/2024 "Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month"[available to view via this link]
	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.

- As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge). The following documents: the draft Gypsies and Travellers Development Plan Document, draft Sustainability Appraisal Report, draft Habitats Regulations Assessment and Evidence base reports were made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury. Electronic access to all submission documents was available at all Wiltshire Council libraries. 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.
- 5.7 A statement of representations procedure (guidance note) explaining how to comment was produced for the consultation and could be viewed both online [available here to download] and in hard copy format at the locations referred to above. The statement of representation procedure also set out information including what the local plan was about, the period for submitting representations, the availability of documents, explanation as to the tests of soundness and how to submit comments. The representation form (produced broadly following the format recommended in the Planning Inspectorate's procedural guidance on local plan examinations) was attached as an appendix to this guidance document whilst also being made available on the consultation website [available here to download] alongside hard copies being available alongside the consultation material at deposit points.
- Respondents were able to respond to the consultation via post, email or via the Council's consultation portal. The consultation portal enabled people to view the plan electronically, both via mobile and computer, and comment directly on the part(s) of the plan they wished to comment on. Instructions on how to use the consultation portal were provided on the consultation webpage [available to view here]. The consultation was also supported by an interactive version of the Plan created using ArcGIS StoryMaps [available to view here]. This enabled people to view the plan alongside an interactive policy map. By navigating to a part of the plan (e.g., site allocation) users were able to view proposals in detail to understand the exact extent and location of, for instance, site allocations and proposals around a specific place.

5.9 An easy read leaflet was produced and posted to all gypsy and traveller pitches and travelling showpeople plots in Wiltshire. This simplified the main information in the Plan in the interests of clarity. The council also commissioned consultants ORS to provide support to residents on sites which included a mix of visits, a dedicated telephone number and email address. A report summarising the engagement undertaken by ORS is set out in Schedule 1 of this Statement.

#### Consultation events

- As part of the consultation there were 5 drop-in events at libraries and leisure centres across the county. At each event there were a series of display boards (available at Schedule 1 of this Appendix) to inform attendees about the Gypsies and Travellers Development Plan Document and how to comment alongside copies of the proposed submission documents and several officers present to inform attendees about the consultation and answer any questions. A live webinar was also held on 3 September, a recording of which was made available on the Council's website and YouTube channel for those who may wish to view it back [available to view here].
- **5.11** The list of consultation events is provided in Table 5.2

Table 5.2 List of Regulation 19 consultation events and attendance

Location	Date	Sign in attendance*	
Online webinar	Tuesday 3rd September	368 attending live	
Salisbury (Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury, SP1 3NR)	Wednesday 4th September	8	
Devizes (Devizes Library, Sheep Street, Devizes, SN10 1DL)	Thursday 5th September	26	
Chippenham (Olympiad Leisure Centre, Sadlers Mead, Chippenham, SN15 3PA)	Monday 9th September	20	
Royal Wootton Bassett (Royal Wootton Bassett Library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX)	Wednesday 11th September	32	
Trowbridge (Atrium, County Hall, Bythesea Road, Trowbridge, BA14 8JN)	Thursday 12th September	13	
*not all attendees signed in so numbers represent an underestimate of attendance			

**5.12** Schedule 1 of this Appendix provides some examples of the publication/ notification materials produced.

## **Regulation 19: Response to consultation**

5.13 A number of responses were received in relation to the consultation. Overall 658 comments were received from 448 submissions. The number of submissions broadly aligns with the number of items (e.g., an email/letter/email plus attachments/portal submission) received from consultees

(note, a consultee may have submitted multiple items amounting to multiple submissions). The number of comments represents the breakdown of these submissions, following officer analysis, against parts of the plan to which they relate. For instance, a single submission (e.g., email) from a consultee may contain comments on 5 policies within the plan amounting to 5 comments. Officer judgement was often required to allocate comments to parts of the Plan within the consultation portal given a number of responses were received by means other than via the consultation portal or the representation form.

- 5.14 All the comments can be viewed verbatim within the Council's consultation portal<sup>28</sup>. Within the consultation portal all representations can be viewed against the part of the Gypsies and Travellers Development Plan Document to which they relate whilst also being viewable based on who submitted comments.
- **5.15** One petition was received as part of the consultation.
  - Policy GT30: Land at Whistley Road, Potterne, with 487 signatures.

In addition, several representations were submitted on behalf of community groups including The Community of Little Somerford, Cleverton and Surrounding Area (206 people), Thickthorn and Preston Neighbourhood Group (56 people), Your Village Your Say (Rowde) and Potterne Residents.

**5.16** A breakdown of the number of comments received against each part of the plan is contained within Table 5.3

Table 5.3 Provides a statistical overview of the number of comments received against each part of the plan

Part of the Plan	Number of comments received
Introduction	49
What is the Plan?	16
How to use this Plan?	4
How has the Plan been prepared?	11
Next Steps	3
Objectives	10
Strategy for Meeting Traveller Needs	7
Policy GT1: Meeting the needs of gypsies and travellers, and travelling showpeople	9
Policy GT2: Safeguarding gypsies and travellers, and travelling showpeople sites	12
Policy GT3: New sites and intensification of existing sites	23
Policy GT4: Meeting needs of gypsies and travellers for culturally appropriate accommodation	2
Policy GT5: Emergency Stopping Sites	6
Site Allocations	12

Part of the Plan	Number of comments received
Site Intensification	10
Policy GT6: Braemar and Braemar (2)	3
Policy GT7: Calcutt Park	5
Policy GT8: Dillons Farm	3
Policy GT9: Easton Lane	8
Policy GT10: Lansdowne	2
Policy GT11: Oak Tree Field	2
Policy GT12: Poplar Tree Residential Park	3
Policy GT13: The Poplars	2
Policy GT14: Rose Field Caravan Site, Hullavington	0
Policy GT15: Land South of Bridge Paddocks	3
Travelling Showpeople	0
Policy GT16: Land opposite the Laurels	1
Policy GT17: Land adjacent Nursteed Park	1
Policy GT18: Petersfinger Business Park	6
Site Allocations to meet pitch needs from households that do not meet the planning definition	1
Policy GT19: Former Glenville Nurseries	1
Policy GT20: Greenfield View, Leigh	3
Policy GT21: Land at Capps Lane	3
Policy GT22: Melbourne View	2
Policy GT23: 79 Southampton Road	3
New Site Allocations	5
Policy GT24: Bushton Farm North	16
Policy GT25: Land at Housecroft Farm (1)	32
Policy GT26: Land at Housecroft Farm (2), Edington Road, Edington	41
Policy GT27: Land at Cleverton, Cleverton	29
Policy GT28: Land at Oxhouse Farm, Rowde	58
Policy GT29: Land at Upper Seagry Farm, Upper Seagry	113
Policy GT30: Land at Whistley Road, Potterne	95
Emergency Stopping Site	4
Policy GT31: Land at Thickthorn Farm, Preston Lane, Lyneham	6

Part of the Plan	Number of comments received
Monitoring and Implementation	2
Appendix 1: Glossary	0
Appendix 2: Changes to Policies Map - Safeguarded Sites identified in Policy GT2	0
Sustainability Appraisal	31

## Regulation 19: Main issues raised and Council response

5.17 A summary of the main issues raised in response to the consultation is contained within Section 3 of this report<sup>29</sup>. More comprehensive tables of key issues have also been provided within Schedule 2 of this Appendix summarising key elements of what stakeholders have said against each part of the Plan. These more detailed key issues are intended to provide a little more information about what consultees have said against each part of the plan and have informed the formulation of the main issues. For the key issue tables contained at Schedule 2, every effort has been made to include information on who has raised each issue to provide further context.

## Schedule 1: Extracts of Regulation 19 consultation advertisement

- 5.18 Schedule 1 of Appendix 2 contains some extracts of the advertisement material produced as part of undertaking the Regulation 19 consultation and the consultants report detailing activity undertaken directly with the Gypsy and Traveller community. Schedule 1 contains the following information:
  - 1. Notification email sent 14/08/2024 to those on Strategic Planning mailing list
  - 2. Residents email newsletter sent 20/08/2024
  - 3. Town and Parish Council email newsletter sent 20/08/2024
  - 4. Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 12/08/2024
  - 5. Press release published 25/07/2024 "Wiltshire's Gypsies and Travellers Development Plan moves to the next stage with public consultation to begin in August"
  - 6. Press release published 15/08/2024 "Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week"
  - 7. Press release published 20/08/2024 "Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month"
  - 8. Display boards available at 5 drop in events held within Wiltshire
  - 9. Regulation 19 consultation report by consultants ORS (including leaflet shared with the gypsy and traveller community)

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In accordance with the requirements to provide a summary of the main issues made pursuant to regulation 20 as per Regulation 22 (1)(c)(v)

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### Notification email sent 14/08/2024 to those on Strategic Planning mailing list

## Consultation on the pre-submission draft Gypsies and Travellers Development Plan Document

Wiltshire Council has published the draft Gypsies and Travellers Development Plan Document (DPD) along with accompanying evidence reports, for formal consultation. The Gypsies and Travellers DPD sets out the vision and framework to allocate land for Gypsies and Travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036 (since revised to 2038), in line with Government planning policy and legislation. Once adopted, relevant planning applications will be determined against the Plan, making it an important document in meeting accommodation need for Gypsy and Traveller communities in Wiltshire.

Comments are invited on the Gypsies and Travellers DPD and supporting evidence base documents during the consultation period, which runs from 9am on Tuesday 20th August to 5pm on Friday 4th October 2024.

In-person events are being held across the county on selected dates from Wednesday 4th September to Thursday 12th September to enable you to find out more information as part of the consultation. You can just turn up to the in-person events, there is no need to book. There will also be an online webinar event on Tuesday 3rd September, however you must register beforehand to attend the online event. To see the full list of in-person events or to register for the online webinar event, see <a href="https://www.wiltshire.gov.uk/planning-gypsy-travellers">https://www.wiltshire.gov.uk/planning-gypsy-travellers</a>. Officers will be available during all sessions to answer questions about the Gypsies and Travellers DPD and we would encourage people to attend and find out more about what the DPD proposes in their area.

#### How to respond

The Gypsies and Travellers DPD and supporting evidence documents are available to view and download at <a href="https://www.wiltshire.gov.uk/planning-gypsy-travellers">https://www.wiltshire.gov.uk/planning-gypsy-travellers</a> from 9am on Tuesday 20th August, and people can also download a representation form and a simplified guidance note from this page.

We welcome your comments via the following means:

- Online via the council's dedicated consultation portal: <a href="http://consult.wiltshire.gov.uk/portal">http://consult.wiltshire.gov.uk/portal</a>. This is the most efficient and effective way to make representations. Further information on how to use the portal can be found at www.wiltshire.gov.uk/local-plan
- By email using the representation form available at https://www.wiltshire.gov.uk/planning-gypsy-travellers and returned to strategicplanning@wiltshire.gov.uk
- By post in writing by completing a representation form and submitting this to:

Strategic Planning
Planning Directorate
Wiltshire Council
County Hall

Bythesea Road

Trowbridge

Wiltshire

BA14 8JN.

Please note that copies of all comments (including your personal details) will be made available for the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

Copies of all the consultation documents can be viewed during normal opening hours at the Council's main offices at Monkton Park in Chippenham, Bourne Hill in Salisbury, and County Hall in Trowbridge.

The following documents: the draft Gypsies and Travellers Development Plan Document, draft Sustainability Appraisal Report, draft Habitats Regulations Assessment and Evidence base reports will be made available to view at the following libraries during normal opening hours:

- Amesbury Library, Smithfield Street, Amesbury, SP4 7AL
- Bradford on Avon Library, Bridge Street, Bradford on Avon, BA15 1BY
- Calne Library, The Strand, Calne, SN11 0JU
- Chippenham Library, Timber Street, Chippenham, SN15 3EJ
- Springfield Community Campus, Beechfield Road, Corsham, SN13 9DN
- Devizes Library, Sheep Street, Devizes, SN10 1DL
- Malmesbury Library, 24 Cross Hayes, Malmesbury, SN16 9BG
- Marlborough Library, 91 High Street, Marlborough, SN8 1HD
- Melksham Community Campus, Market Place, Melksham, SN12 6ES
- Pewsey Library, Aston Close, Pewsey, SN9 5EQ
- Royal Wootton Bassett Library, Borough Fields, Royal Wootton Bassett, SN4 7AX
- Salisbury Library, Market Walk, Salisbury, SP1 1BL
- Tidworth Library, Tidworth Leisure Centre, Nadder Road, Tidworth, SP9 7QA

- Tisbury Library, Nadder Community Campus, Tisbury, SP3 6HJ
- Trowbridge Library, County Hall, Bythesea Road, Trowbridge, BA14 8JN
- Warminster Library, Three Horseshoes Walk, Warminster, BA12 9BT
- Westbury Library, Westbury House, 15 Edward Street, Westbury, BA13 3BD

Information on library opening times can be found at:

https://apps.wiltshire.gov.uk/librariesinformation. Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Following the consultation, the council will consider the comments received before submitting the Gypsies and Travellers DPD and supporting evidence to the Secretary of State for examination. All comments received during this consultation will be passed on to the appointed independent Planning Inspector at that stage.

Any representation received may be accompanied by a request to be notified at a specific address of any of the following: that the Gypsies and Travellers DPD has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the DPD has been published; and that the Gypsies and Travellers DPD has been adopted.

Should you require further information, please email: <a href="mailto:strategicplanning@wiltshire.gov.uk">strategicplanning@wiltshire.gov.uk</a> or call 01225 713223.

If you no longer wish to receive emails to do with the Gypsies and Travellers Development Plan Document, please let us know by emailing strategicplanning@wiltshire.gov.uk

#### Strategic Planning Services



Email: strategicplanning@wiltshire.gov.uk

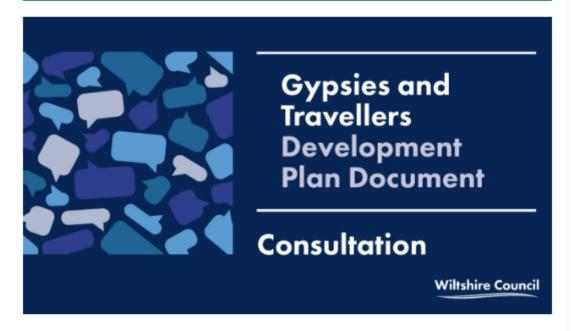
Gypsies and Travellers Development Plan Document consultation webpage:

https://www.wiltshire.gov.uk/planning-gypsy-travellers

#### Residents email newsletter sent 20/08/2024



20 August 2024



# Gypsies and Travellers Development Plan consultation begins today, with engagement events to start next month

You can now have your say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable you to find out more about the Development Plan Document and ask questions, we are holding five engagement events at different locations around the county in September where you can drop-in to find out more, and one online engagement event.

You can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on our website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many of our libraries.

You can share your views through our online portal, and anyone without internet access can visit a library to use the computers, or contact us to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues you can comment on will be available on our website.

The list of engagement events is as follows. You can just turn up at any time during the in-person events, which are drop-in sessions – there is no need to book. However, if you wish to attend the online event, you must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events – they do not need to choose the one nearest to them.

Event	Date	Time	Location
General information webinar	Tuesday 3 September	6pm- 7.30pm	Online
Salisbury	Wednesday 4 September	4.30pm- 7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Devizes	Thursday 5 September	4.30pm- 7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
Chippenham	Monday 9 September	4.30pm- 7pm	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA
Royal Wootton Bassett	Wednesday 11 September	4.30pm- 7pm	Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX
Trowbridge	Thursday 12 September	4.30pm- 7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

Find out more, take part in the consultation and sign up for the engagement event

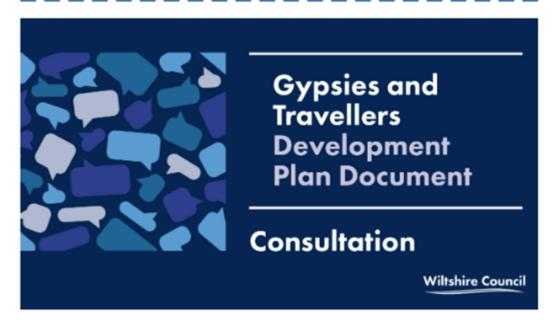
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#### Town and Parish Council email newsletter sent 20/08/2024



20 August 2024



# Gypsies and Travellers Development Plan consultation begins today, with engagement events to start next month

Your communities can now have their say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable people to find out more about the Development Plan Document and ask questions, we are holding five engagement events at different locations around the county in September where you can drop-in to find out more, and one online engagement event.

People can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on our website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many Wiltshire Council libraries.

Anyone can share their views through our online portal, and anyone without internet access can visit a library to use the computers, or contact us to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues people can comment on will be available on our website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions – there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events – they do not need to choose the one nearest to them.

Event	Date	Time	Location
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Trowbridge	Thursday 12 September	4.30pm- 7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

Find out more, take part in the consultation and sign up for the engagement event







## Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 12/08/2024

#### Wiltshire Gypsies and Travellers Development Plan Document

Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012
(Regulation 19)

The Environmental Assessment of Plans and Programmes Regulations 2004

## Notice of Publication of the draft Wiltshire Gypsies and Travellers Development Plan Document

Notice is hereby given that Wiltshire Council has published the draft Wiltshire Gypsies and Travellers Development Plan Document ("the draft Plan") for a formal consultation period beginning on **Tuesday 20<sup>th</sup> August 2024** during which representations may be made.

Following consultation, the Council will register and consider the comments received before submitting the draft Plan to the Secretary of State for Housing, Communities and Local Government.

The draft Plan addresses the accommodation needs of Wiltshire's travelling communities to 2038 and updates Core Policy 47 'Meeting the needs of Gypsies and Travellers' of the Wiltshire Core Strategy. The draft Plan contains policies that collectively make provision for the permanent and temporary accommodation needs of the travelling community. These include policies allocating new sites and existing sites for additional pitches and plots. The draft Plan also safeguards existing sites so that they can continue to meet on-site needs in the longer term.

The proposed submission documents include: the draft Plan, the draft Sustainability Appraisal report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004), the draft Habitat Regulations Assessment and a number of other supporting documents that form part of the evidence base for the draft Plan.

The period for submitting representations relating to the draft Plan begins 9am

Tuesday 20<sup>th</sup> August 2024 and closes at 5pm on Friday 4<sup>th</sup> October 2024.

Representations received beyond this date may not be considered. A statement of the representations procedure (guidance note) explaining how to comment can be viewed alongside the proposed submission documents. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential. Anonymous comments cannot be accepted.

The proposed submission documents can be viewed on the Council's website at: <a href="https://www.wiltshire.gov.uk/planning-gypsy-travellers">www.wiltshire.gov.uk/planning-gypsy-travellers</a> and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge).

The following documents: the draft Plan; the draft Sustainability Appraisal Report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004); the draft Habitat Regulations Assessment, and various evidence base reports will be made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury.

Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Representations can be submitted via the following means:

- online via the Council's consultation portal accessible via this link: www.wiltshire.gov.uk/planning-gypsy-travellers
- by email using the form available at: <a href="www.wiltshire.gov.uk/planning-gypsy-travellers">www.wiltshire.gov.uk/planning-gypsy-travellers</a> and returned to mailto:strategicplanning@wiltshire.gov.uk; or
- by post in writing to: Strategic Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

The form has an accompanying statement of the representations procedure (guidance note) to assist in its completion. Please use a separate form for each representation you wish to make.

Address details will not be made publicly available. All personal data will be handled in line with the council's Strategic Planning privacy policy. You can view the Council's privacy notice at https://www.wiltshire.gov.uk/planning-privacy-notice.

Any representation may be accompanied by a request to be notified at a specified address (email/postal) of any of the following: that the draft Plan has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the draft Plan has been published; and that the draft Plan has been adopted.

There will be a general information live webinar on Tuesday 3<sup>rd</sup> September 2024 at 6:00pm to 7.30pm and five drop-in events held around the county where you can ask questions and gain further information about the consultation. More information on these events can be found at: <a href="https://www.wiltshire.gov.uk/planning-gypsy-travellers">www.wiltshire.gov.uk/planning-gypsy-travellers</a>

If you require more information or would like to request copies of documents, please contact Strategic Planning via email (mailto:strategicplanning@wiltshire.gov.uk), phone (01225 713223) or post to Strategic Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

Nic Thomas

Director of Planning

# Press release published 25/07/2024 "Wiltshire's Gypsies and Travellers Development Plan moves to the next stage - with public consultation to begin in August"

Home > News and communications

## Wiltshire's Gypsies and Travellers Development Plan moves to the next stage - with public consultation to begin in August

Following its approval at Wiltshire Council's Cabinet meeting last week and yesterday's Full Council meeting (Wednesday 24 July), Wiltshire's Gypsies and Travellers Development Plan will now move to the next public consultation stage.

Published 25 July 2024

The Regulation 19 public consultation begins on Tuesday 20 August until 5pm on Friday 4 October. To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county and one online engagement event.

Wiltshire Council, like all Local Planning Authorities, must plan for all members of the community, including Gypsies and Travellers. It must make provision to meet the accommodation needs of travellers, which includes Gypsies, Travellers and travelling showpeople, including the allocation of sites in development plans to meet this need.

The Development Plan Document, which is based on robust evidence, sets out how it will provide pitches for Gypsies and Travellers over the plan period, from 2024-2038.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "Wiltshire Council is meeting its statutory obligations in planning for all members of the community, and that includes the Gypsy and Traveller communities."

"Wherever possible, the provision of additional pitches is on existing Gypsy and Traveller sites. Elsewhere, seven potential new sites have been proposed, five of which are on Wiltshire Council land."

"All of the allocations have been selected taking account of the availability of sites as well their proximity to local facilities. This information can be read on our website. I would strongly urge anyone interested to attend the engagement events and have their say once the consultation starts in August."

Once adopted, the Plan will sit alongside the Wiltshire Local Plan review. Together they will form the Local Plan for Wiltshire and complete the update of the Wiltshire Core Strategy. If found sound by the Inspector, the Plan would be adopted later in 2025.

The list of engagement events is as follows. People can just turn up at the in-person events - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

To find out more and to sign up for the online engagement event, people should go to <a href="www.wiltshire.gov.uk/planning-gypsy-travellers">www.wiltshire.gov.uk/planning-gypsy-travellers</a>

Town	Date	Time	Location
General information webinar	Tuesday 3 September	6pm- 7.30pm	Online
Salisbury	Wednesday 4 September	4.30pm- 7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Devizes	Thursday 5 September	4.30pm- 7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
Chippenham	Monday 9 September	4.30pm- 7pm	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA
Royal Wootton Bassett	Wednesday 11 September	4.30pm- 7pm	Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX
Trowbridge	Thursday 12 September	4.30pm- 7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

Explore the topic Planning news











## Press release published 15/08/2024 "Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week"

Home > News and communications

## Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week

In just a few days people in Wiltshire will be able to take part in the Gypsies and Travellers Development Plan Document consultation and have their say on the proposals.

Published 15 August 2024

The Regulation 19 public consultation begins on Tuesday 20 August and runs until 5pm on Friday 4 October. To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county and one online engagement event.

The council has a statutory obligation to plan for all members of the community, including Gypsies and Travellers, and the draft Development Plan Document sets out how their housing needs will be provided for over the plan period, from 2024-2038.

Many of the required pitches and plots will be on existing Traveller sites, and once the plan is adopted, they would be subject to further consultation as part of the planning application process to help ensure proposals are brought forward in the right way.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "The council is planning for all members of the community here in Wiltshire and our Business Plan commits to seek to improve health outcomes for the Gypsy, Roma and Traveller communities."

"Meeting the housing needs of this community is a key part of why the draft Gypsies and Travellers Development Plan Document, which looks ahead to 2038, has been prepared."

"I'd urge people to take part in the consultation when it begins on Tuesday 20 August and let us know their views."

"Everyone is welcome to attend our engagement events and sign up for our online webinar to find out more."

Following the public consultation and consideration of all comments received, it is anticipated that the Plan will go to Cabinet and Full Council again in December. It will then be submitted for examination by an independent Planning Inspector appointed by the Government, who will consider all comments received on the Plan. If found sound by the Inspector, it is anticipated the Plan will be adopted later in 2025.

Information about what types of issues people can comment on will be provided on the council's website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

To find out more and sign up for the engagement event, people should go to www.wiltshire.gov.uk/planning-gypsy-travellers.

Event	Date	Time	Location
General information webinar	Tuesday 3 September	6pm - 7.30pm	Online
Salisbury	Wednesday 4 September	4.30pm - 7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Devizes	Thursday 5 September	4.30pm - 7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
Chippenham	Monday 9 September	4.30pm - 7pm	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA
Royal Wootton Bassett	Wednesday 11 September	4.30pm - 7pm	Royal Wootton Bassett Library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX
Trowbridge	Thursday 12 September	4.30pm - 7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

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Press release published 20/08/2024 "Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month"

Home > News and communications

## Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month

Published 20 August 2024

People in Wiltshire can now have their say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county in September where people can drop-in to find out more, and one online engagement event.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "The draft Gypsies and Travellers Development Plan Document sets out how we propose to plan growth for the housing needs of Gypsies, Travellers and travelling showpeople in Wiltshire up to 2038.

"At this stage in the process, it's very important that we get feedback and comments from everyone with an interest in the plan. To enable people to ask questions and find out more, we are holding five in-person drop-in engagement events and one online, and people can sign up for the online event now - there is no need to sign up for the in-person events ahead of time."

Wiltshire Council, like all Local Planning Authorities, must plan for all members of the community, including Gypsies and Travellers. It must make provision to meet the accommodation needs of travellers, which includes Gypsies, Travellers and travelling showpeople, including the allocation of sites in development plans to meet this need.

People can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on the council's website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many Wiltshire Council libraries.

People can share their views through the council's online portal, and anyone without internet access can visit a library to use the computers, or contact the council to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues people can comment on will be provided on the council's website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

People can share their views through the council's online portal, and anyone without internet access can visit a library to use the computers, or contact the council to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues people can comment on will be provided on the council's website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

Find out more and sign up for the engagement event Regulation 19 consultation summer 2024.

Date	Time	Location
Tuesday 3 September	6pm- 7.30pm	Online
Wednesday 4 September	4.30pm- 7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Thursday 5 September	4.30pm- 7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
Monday 9 September	4.30pm- 7pm	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA
Wednesday 11 September	4.30pm- 7pm	Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX
Thursday 12 September	4.30pm- 7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN
	Tuesday 3 September  Wednesday 4 September  Thursday 5 September  Monday 9 September  Wednesday 11 September  Thursday 12	Tuesday 3 September 6pm- 7.30pm  Wednesday 4 4.30pm- 7pm  Thursday 5 4.30pm- 7pm  Monday 9 September 4.30pm- 7pm  Wednesday 11 4.30pm- 7pm  Wednesday 11 4.30pm- 7pm  Thursday 12 4.30pm-









#### Display boards available at drop in events

Please see overleaf

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## Gypsies and Travellers Development Plan Document

### **Consultation**



## What is the Gypsies and Travellers Plan and why are we doing it?

National planning policy requires councils to plan for the accommodation needs of all groups within the community, including travellers. The aim is to ensure fair and equal treatment of travellers in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. In summary, authorities are required to:

- · Assess the permanent and temporary accommodation needs of travellers.
- Identify land in the right locations to meet need through sustainable development.
- · Address unauthorised encampments.
- Reduce tensions between traveller and settled communities in plan-making and decision taking.

The Gypsies and Travellers Development Plan Document sets out Wiltshire Council's strategic planning policies for meeting the accommodation needs of gypsies and travellers and travelling showpeople.

It will replace 'Core Policy 47: Meeting the needs of Gypsies and Travellers' of the Wiltshire Core Strategy (adopted January 2015).

The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. Together both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire; except for the small part in the New Forest National Park.

The Plan has been prepared in accordance with national planning policy. It is based on robust evidence in the form of a Gypsy and Traveller Accommodation Assessment (GTAA) to establish the accommodation needs of Wiltshire's travelling community across the plan period from 1 April 2024 to 31 March 2038. The GTAA considers the need for transit provision and permanent accommodation within the plan area.

While this Plan is the starting point when determining planning applications for traveller sites, all other relevant policies within the development plan and national policy will be taken into account, along with other material considerations.

The following four objectives have been developed for the Plan:

#### Objective 1:

To meet identified accommodation needs for Gypsies and Travellers pitches and travelling showpeople plots to 2038 through site allocations, broad locations for growth and a policy framework for assessing proposals.

#### Objective 2:

To make provision for three council-managed emergency stopping places to provide temporary accommodation.

#### **Objective 3:**

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

#### **Objective 4:**

To set out the approach to meeting needs for culturally appropriate accommodation for Gypsies and Travellers that do not meet the planning definition.



Table 1: Pitch need for Gypsies and Travellers meeting the planning definition

Year period	0-5	6-10	11-14	Plan period
Dates	2024-29	2029-34	2034-38	2024-2038
Pitch need	81	25	22	128

#### How many pitches and plots are needed?

There are 85 sites with around 380 pitches and plots for Gypsies and Travellers and travelling showpeople in Wiltshire. The majority are authorised private sites for Gypsies and Travellers. There are also three sites with 50 pitches for gypsies and travellers that are owned and managed by Wiltshire Council.

The GTAA identifies for the plan period – 1 April 2024 to 31 March 2038 – the need for 128 Gypsy and Traveller pitches for households that meet the planning definition comprising:

- · 60 concealed or doubled-up households or single adults
- 11 households on unauthorised developments
- 4 from in migration/roadside
- · 6 households living in bricks and mortar
- · 47 from future household formation

For travelling showpeople, a need for 9 plots has been identified over the plan period comprising:

- · 8 from concealed households
- · 1 from future household formation

It also identifies that 54 teenagers may need accommodation of their own in the next five years but that this could be met by siting additional caravans on family sites.

Tables 1 and 2 shows that most need is within the first five years of the plan period. In line with national policy, the plan needs to provide sites allocations to ensure that need in the first 5 years of the plan can be met and policies to address need across the remainder of the plan period.

As there are no transit sites in Wiltshire the GTAA also identifies the need for three emergency stopping sites in the north, south and west of Wiltshire to provide a network of sites.

Table 2: Plot need from travelling show people meeting the planning definition

Year period	0-5	6-10	11-14	Plan period
Dates	2024-29	2029-34	2034-38	2024-2038
Pitch need	8	0	1	9

#### What policies does the plan include?

There are 31 policies in total that collectively deliver the plan objectives, as follows:

**Policy GT1** sets out the target numbers of pitches and plots to be provided over the period and the type of sites to address this.

**Policy GT2** safeguards sites and exceptionally allows for additional provision on existing sites for travellers that do not meet the planning definition.

**Policy GT3** sets out criteria for new sites and intensification of existing sites.

**Policy GT4** sets out the approach to meeting needs of ethnic gypsies or travellers who do not meet the planning definition as they have never travelled.

**Policy GT5** sets out criteria for emergency stopping sites to be provided by the council.

**Policies GT6 to GT31** set out polices for individual site allocations.

Consistent with national policy, the Plan focuses on addressing the accommodation needs of gypsies and travellers and travelling showpeople who meet the following definitions:

#### **Gypsies and travellers**

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

#### Travelling showpeople

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

#### What sites have been allocated?

Table 1: Allocations for site intensification (planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers			
Policy GT6	Braemar	5	Salisbury
Policy GT7	Calcutt Park	1	Cricklade
Policy GT8	Dillions Farm	1	Grimstead
Policy GT9	Easton Lane	3	Corsham
Policy GT10	Lansdowne	7	Semington
Policy GT11	Oak Tree Field	14	Britford
Policy GT12	Poplar Tree Residential Park	7	Southwick
Policy GT13	The Poplars	2	Dilton Marsh
Policy GT14	Rose Field Caravan Site	2	Hullavington
Policy GT15	Land to the South of Bridge Paddocks	2	Purton
Total		44	
Travelling showped	ople		
Policy GT16	Land Opposite the Laurels	3	North Bradley
Policy GT17	Land adjacent Nursteed Park	4	Devizes
Policy GT18	Petersfinger Business Park	1	Clarendon Park
Total		8	

Table 2: Allocations for site intensification (do not meet planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers	i i		
Policy GT19	Former Glenville Nurseries	1	Royal Wootton Bassett
Policy GT20	Greenfield View	1	Cricklade
Policy GT21	Land at Capps Lane	1	Bratton
Policy GT22	Melbourne View	1	Great Someford
Policy GT23	79 Southampton Road	2	Clarendon Park
Total		6	

Table 3: New site allocations (planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers			
Policy GT24	Bushton North Farm, Bushton	3	Royal Wootton Bassett
Policy GT25	Housecroft Farm 1, Edington	2	Edington
Policy GT26	Housecroft Farm 2, Edington	2	Edington
Policy GT27	Land at Cleverton, Cleverton	10	Lea and Clevedon
Policy GT28	Oxhouse Farm, Rowde	10	Rowde
Policy GT29	Upper Seagry Farm, Upper Seagry	5	Seargry
Policy GT30	Whistley Road, Potterne	2	Potterne
Total		34	

#### How do I respond?

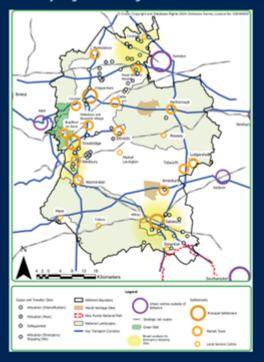
The Council has published the Plan so that you can make comments on it before it is submitted for examination by a government appointed Planning Inspector.

Comments can be submitted online via the Council's consultation portal accessible via this link or via the QR code:

#### www.wiltshire.gov.uk/planning-gypsy-travellers

The purpose of the examination is to see whether the plan meets the test of soundness defined in the National Planning Policy Framework (NPPF) and in particular whether the plan is positively prepared, justified, effective and consistent with national policy and meets all the relevant legislative requirements.

#### Wiltshire key diagram including overview of allocated sites:



#### Please consider the following questions:

- 1. Is the Plan positively prepared?
- 2. Is the Plan justified?
- 3. Is the Plan effective?
- 4. Is the Plan consistent with national policy?

The consultation begins at 9am on Tuesday 20 August 2024 and closes at 5pm on Friday 4 October 2024. Representations received beyond this date may not be considered. To make representations and to read the Gypsies and Travellers Development Plan Document and supporting documents, please go to:

#### www.wiltshire.gov.uk/planning-gypsy-travellers

The above webpage also contains information on how to comment. Please note we cannot accept anonymous representations, as we must ensure that the names of people who make a representation can be made available and be taken into account by the Planning Inspector at the examination.

Anyone without internet access can visit their local library to view documents online. Hard copies of all documents are available in the Council's main offices and some libraries.

If you would like more information or would like to request copies of the documents, please contact Strategic Planning via email (strategicplanningpolicy@wiltshire.gov.uk), phone (01225 713223) or post to Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

#### Next steps

After the Regulation 19 consultation period, the council will consider the response to the consultation before submitting the Plan, accompanying evidence, and all representations received to the Secretary of State who will appoint a Planning Inspector to undertake independent examination. This submission is anticipated to take place in early 2025 with the examination and hearings anticipated to take place following this.



Scan me to have your say



## Consultants reports (including leaflet shared with the gypsy and traveller community)



# Wiltshire Gypsies and Travellers Development Plan Document Pre-Submission Draft (Regulation 19) Consultation

November 2024

Opinion Research Services - The Strand - Swansea - SA1 1AF - www.ors.org.uk - info@ors.org.uk



Opinion Research Services, The Strand, Swansea SA1 1AF

Steve Jarman, Michael Bayliss, Elliot Muldoon, Hanna Lloyd, Jonathan Lee and Nigel Moore

Enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

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#### 1. SUMMARY

- 1.1 Between Tuesday 20th August and Friday 4th October 2024 Wiltshire Council completed a Regulation 19 Consultation on their Gypsies and Travellers Development Plan Document (DPD).
- As part of the consultation process the Council prepared information that set out the reasons for the consultation and the proposed site and yard allocations that they were including in the DPD to meet need that had been identified in the Gypsy and Traveller Accommodation Assessment (GTAA) that was completed by ORS.
- 1.3 As well as communicating widely with the settled community, an easy read leaflet, Statement of Representation Procedure and a copy of the representation form was sent by the Council to all known Gypsy and Traveller sites and Travelling Showpeople yards in Wiltshire prior to the consultation commencing on 20th August 2024.
- 1.4 To maximise engagement with the Gypsy and Traveller and Travelling Showpeople communities, the Council engaged the services of ORS to support the Regulation 19 consultation process.
- 1.5 The purpose of the engagement that was completed by ORS was to seek to encourage members of the Travelling Community living on sites and yards in Wiltshire to engage with and respond to the DPD consultation process.
- 1.6 The Council agreed a list of sites and yards to be visited by ORS and also provided additional consultation materials including copies of the DPD, Statement of Representation Procedure and Representation Forms as well as additional easy read leaflets to support the engagement.
- 1.7 The focus of the site and yard visits agreed between ORS and the Council was to engage with site/yard owners and residents on existing sites/yards which were allocated for intensification in the DPD.
- 1.8 To prioritise the resource provided by ORS, the Council provided additional support through its Housing Management Team for the Council run sites.
- 1.9 Further support was provided by the site management company for two of the commercial run sites
- 1.10 Access was provided to both a dedicated ORS email address and telephone number for any enquiries from the Gypsy and Traveller or Travelling Showpeople sites across Wiltshire who needed support.
- 1.11 The Council also offered an online webinar and five face-to-face consultation sessions around the County which anyone was able attend.
- 1.12 A copy of the easy read consultation leaflet can be found in Appendix A.
- 1.13 The allocations that were proposed in the DPD were on a total of 25 Gypsy and Traveller sites or Travelling Showpeople yards, out of which 18 were existing sites/yards proposed for additional pitches or plots, and 7 new sites for Gypsy and Traveller pitches.

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Figure 1 - Sites and Yards Visited in Wiltshire (August-October 2024)

DPD Policy	Site/Yard Name	Outcome
GT6	Braemar and Braemar 2	DPD Consultation Form was completed by ORS and posted back to the Council. The site owners need the pitches for children in the future.
GT7	Calcutt Park	ORS spoke to owner of the site who said they will complete the DPD Consultation Form and return it to the Council as a pitch is needed for a child who is getting married.
GT8	Dillons Farm	Owner was given a DPD Consultation Form by ORS to complete and they said they would return it to the Council.
GT9	Easton Lane (Notton Stables, Notton Park)	DPD Consultation Form was completed by ORS and posted back to the Council.
GT10	Lansdowne	DPD Consultation Form was completed by ORS and posted back to the Council.
GT11	Oak Tree Field	The site owner is going to complete DPD Consultation Form online for this site and for Dairy House Bridge.
GT12	Poplar Tree Residential Park	DPD Consultation Form was completed by ORS and posted back to the Council.
GT13	The Poplars	ORS spoke to owner of the site who will complete the DPD Consultation Form and return it to the Council
GT14	Rose Caravan Site	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.
GT15	Land to the South of Bridge Paddocks	Form was completed by ORS and posted back to the Council.
GT16	Land opposite the Laurels	Site owners are going to go online to complete the DPD Consultation Form.
GT17	Land adjacent Nursteed Park	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.

<sup>1.14</sup> During the course of the consultation period ORS attempted to visit each of the 18 existing sites and yards up to 3 times to engage with site/yard owners/residents to explain the DPD process and to encourage them to respond to the Regulation 19 Consultation. Where owners/residents were unable to complete the consultation response form themselves ORS provided assistance or completed the form on their behalf.

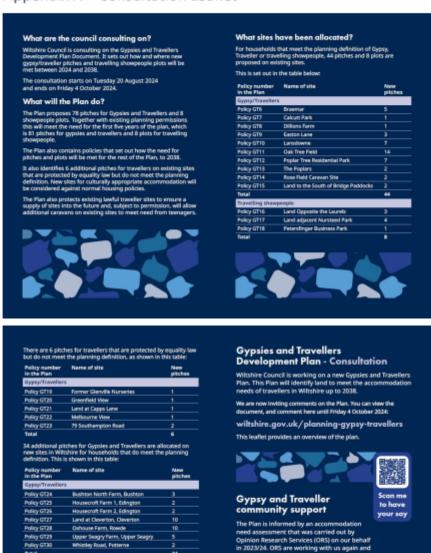
<sup>1.15</sup> ORS were able to visit all of 18 of the existing sites and yards where allocations have been made in the DPD and a summary out the outcomes of these visits can be found in the table below.

GT18	Petersfinger Business Park (The Dormers)	Site owners were given the DPD Consultation Form by ORS. They will complete once they have spoken with their Planning Agent.
GT19	Former Glenville Nurseries	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.
GT20	Greenfield View	DPD Consultation Form was completed by ORS and posted back to the Council.
GT21	Land at Capps Lane (Shellbrooke View)	Site owners are going to go online to complete the DPD Consultation Form.
GT22	Melbourne View	ORS spoke to owner on the phone as they were away. They will complete the DPD Consultation Form when they return.
GT23	79 Southampton Road	Site owners are going to go online to complete the DPD Consultation Form.

<sup>1.16</sup> In addition an ORS email address was included on the consultation leaflet. During the course of the consultation period no responses were received.

<sup>1.17</sup> Finally, telephone details for ORS were included in the consultation leaflet but no incoming calls were received other than to arrange suitable times to visit sites or yards.

#### Appendix A – Consultation Leaflet



Gill Craddock: 07539 999901

Lee Craddock: 07419 241925

Email: WiltshirePlan@ors.org.uk

Wiltshire Council

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o allocates a site at Thickthorn Farm, Lyneham for tergency Stopping Site and commits to two further touth and west of Wiltshire.

## Schedule 2: Summary of the key issues raised by the Regulation 20 representations

- 5.19 Schedule 2 provides a series of tables that outline the key issues raised pursuant to Regulation 19/20 and the comments received. These are presented in plan order.
  - Please note, the tables that follow are not intended to provide a verbatim list of all issues raised from each and every representation, rather they present a judgement of key issues that have arisen following analysis of all comments received to provide an illustration of the key issues raised against each part of the plan. They are also intended to provide an indication of who has contributed to any key issue(s).
- **5.20** Each table will be presented in the format as illustrated in the template table below.

Table 5.4 [Insert policy number / part of plan being referred to] key issues

Key issues raised (Insert policy xx / local plan part)	Respondent(s)		
(Sub headings used to group key issues of a similar theme)			
Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 10 individuals)		
Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 60 individuals)		
best summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue ording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 100 individuals)		
(Sub headings used to group key issues of a similar theme)			
Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.	Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 300 individuals)		

## **Gypsies and Travellers Development Plan Document Section 1: Introduction**

- 5.21 Please see below the key issues tables listing the key issues raised for the parts of the plan within section 1: Introduction namely:
  - What is the Plan?
  - How to use this Plan?
  - How has the Plan been prepared?
  - Next steps

Table 5.5 Introduction key issues

Key issues raised (Introduction)	Respondent(s)		
General Comments			
Suggests No Changes: Lydiard Millicent Parish Council suggest no changes to the Plan.	Lydiard Millicent Parish Council.		
<b>No comment:</b> The Canal and River Trust have reviewed the consultation documentation and make no comments on the plan.	Canal and River Trust.		
Potential for consultation with statutory body: If any works are in the vicinity of any Exolum Pipeline apparatus, then please contact Exolum Pipeline System Ltd.	Exolum Pipeline System Ltd.		
<b>Earlier consultation would have been beneficial:</b> The Council should have consulted with parishes at an earlier stage regarding the site selection process and the proposed sites.	Little Somerford Parish Council.		
Supports provisions being made for the Gypsy and Traveller community: Welcomes the presence of Sypsies and Travellers in the community.	Individual x1.		
mate Emergency: The plan does not tackle the global climate emergency.	Individual x1.		
Han is inconsistent and unjustified: Plan is not consistent with national planning policy and is not justified.	Individuals x5.		
Duty to Cooperate: Wiltshire Council has not adequately consulted with neighbouring authorities.	Individual x1.		
Unsound: The overall plan is unsound.	Individual x1.		
<b>Planning enforcement action</b> : To date, experience with enforcement action taken on Gypsies and Travellers sites has been negative with little progress being made.	Semington Parish Council.		
<b>Lack of overall need:</b> No need for more Gypsy and Traveller sites as there are already some unauthorised pitches at Frampton Farm, Sutton Benger.	Individual x1.		
<b>Touring vans:</b> Section 3.6 mentions that extra touring vans can be used as single adult/teenage accommodation as well as 'those soon to need accommodation' which is ambiguous wording and hard to quantify.	Individual x1.		
Site Specific Comments (see relevant policy for further comments)			
Access to dairy farm site: Land will remove access of farmer to dairy farm on site. (Comment in relation to unknown site)	Individual x1.		

Table 5.6 What is the plan? key issues

Key issues raised (What is the plan?)	Respondent(s)
General comments	
Funding: Query how development of the sites will be funded.	Individual x1
Unsound: The Plan is not sound. Query the need to meet accommodation needs.	Individual x1
<b>Financial Statement:</b> The Plan is well prepared with great detail. A financial statement to complete the justification of sites would be expected. A summary explaining if they are to be funded by Wiltshire Council or the national government and if there are any financial benefits such as rental income, council tax etc.	Individual x1
Paragraph 1.2: Text in paragraph 1.2 clarifying the extent of the Plan area and that it excludes the New Forest National Park area is welcomed. However, Figure 1 could be clarified. The administrative area of Wiltshire Council overlaps with the New Forest National Park, which is covered by the New Forest National Park Authority. It should be noted that New Forest District Council and the New Forest National Park Area are undertaking their own GTAA to cover this area which will inform future Local Plan policies.	New Forest National Park Authority, New Forest District Council
Difficulty Navigating the Plan: The Plan is difficult to navigate and does not promote cooperation and parsparency.	Individual x1
<b>Monitoring</b> : Questions raised over who is responsible for the policing of the sites - check in, check out, managing good behaviour, overstay and capacity. Who is responsible for maintenance of sites - hedges, trees, watering new plants, pruning, maintenance of waterways, hard surfaces and paths and rubbish disposal. What are the arrangements for sewerage, how will chemical toilets be emptied. How will utilities e.g. water and electricity be paid for.	Individual x2
Habitats Regulations	
<b>Appropriate Assessment:</b> It is noted an appropriate assessment under the provision of the Habitats Regulations has been undertaken by LUC. The assessment concludes the proposal will not result in adverse effects on the integrity of European sites. Natural England is satisfied and have no objections to the proposal, providing that all mitigation measures are appropriately secured in any permission given.	Natural England
Site Selection	
<b>Site Selection Process:</b> A number of existing Gypsy and Traveller sites were omitted from the existing sites in the appraisal documentation that could be expanded as alternatives to new sites. Whilst acknowledging the identified need for 81 pitches, following a number of recent planning decisions, the need has reduced to 68	Chippenham Without Parish Council, Kington St Michael Parish Council

Key issues raised (What is the plan?)	Respondent(s)
pitches. Other planning applications in the pipeline could reduce that number further. There are numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be considered suitable and could prevent further development in the open countryside.	

Table 5.7 How to use this Plan? key issues

Key issues raised (How to use this Plan?)	Respondent(s)
General Comments	
Plan length and language: The Plan is too long with a lot of technical language.	Individuals x2
Communication of Plan: Plan was communicated ineffectively to Erdington community.	Individual x1.

Table 5.8 How has the plan been prepared key issues

Key issues raised (How has the Plan been prepared)	Respondent(s)
General comments	
Plan is out of date and discriminatory: Considers the plan document out of date and ethnically discriminatory.	Individual x1.
<b>Too much and too complicated consultation material:</b> Too many complex documents, a short summary of salient points should have been prepared, which would limit the need to seek assistance from others to gain an understanding of the document/process.	Individual x1.
Residents do not all have access to computers: Implied computer literacy, the majority of the public are not computer literate or have access to a printer.	Individual x1.
<b>Difficulty using consultation portal:</b> The portal was difficult to use due to use of 'planning/government' speak, confusing where to add comments relating to spite-specific elements and the general consultation process and what was considered compliant.	Individual x1.
the process was not widely notified/advertised, with publicity of the process, meetings and deadlines being haphazard and hidden in manner. A letter should be been sent to everyone in Wiltshire informing them of the process and proposals.	Individual x1.
<b>Onknown Site:</b> One comment received in relation to an unknown site under this policy. Concerns raised with regard to the road and site location, access to local facilities, sanitation and the effects on local nature stability.	Individual x1.
Site Selection	
<b>Unauthorised pitches could be considered:</b> Reference made to numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be suitable, even considered brownfield-land rather than taking areas of open countryside.	Langley Burrell Parish Council.

#### Table 5.9 Next Steps key issues

Key issues raised (Next Steps)	Respondent(s)
Support the Policy	
Support policy: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.

## **Gypsies and Travellers Development Plan Document Section 2: Objectives**

- 5.22 Please see below the key issues table listing the key issues raised for the part of the plan within section 2:
  - Objectives:

Table 5.10 Objectives key issues

Key issues raised (Objectives)	Respondent(s)
General Comments	
Agricultural land: The Plan should avoid impact on the best and most versatile agricultural land in the county.	Individual x1.
Support: Dorset Council supports the four broad objectives.	Dorset Council.
<b>Consultation:</b> The Plan has not been created in consultation with local communities and does not consider the impact on settled residents.	Clarendon Park Parish Council.
<b>Environmental requirements</b> : The Plan has no consideration towards net zero targets, noise pollution requirements, flooding and infrastructure requirements. There should be an Environmental Impact Assessment.	Clarendon Park Parish Council.
<b>Balanced communities:</b> Wiltshire Council should seek to support mixed and balanced communities in plan-making and decision taking.	Clarendon Park Parish Council.

## **Gypsies and Travellers Development Plan Document Section 3: Strategy for Meeting Travellers Needs**

- 5.23 Please see below the key issues table listing the key issues raised for the part of the plan within section 3: Strategy for Meeting Travellers Needs namely:
  - Policy GT1: Meeting the needs of gypsies and travellers, and travelling showpeople
  - Policy GT2: Safeguarding gypsies and travellers, and travelling showpeople sites
  - Policy GT3: New sites and intensification of existing sites
  - Policy GT4: Meeting needs of gypsies and travellers for culturally appropriate accommodation
  - Policy GT5: Emergency Stopping Sites

**Table 5.11 Strategy for Meeting Traveller Needs key issues** 

Key issues raised (Strategy for Meeting Traveller Needs)	Respondent(s)
Support	
Support the strategy: Support the Plan strategy.	Individuals x2.
<b>Meeting need:</b> Support the allocation of suitable sites which would work in the interest of meeting needs and improving the relationship between settled and traveller communities.	Individual x1.
<b>Meeting need:</b> Support Policies GT1-GT5 in identifying the methods of meeting the needs of the travelling community within Wiltshire.	Individual x1.
<b>Meeting need:</b> Swindon Council is seeking to meet its needs in full. Should this not be possible following the outcome of the site appraisal work, Swindon Borough Council would like to continue further constructive engagement with Wiltshire Council and other Local Authorities on this matter	Swindon Borough Council
Duty to Cooperate: Will continue to engage and work with Wiltshire Council on cross-boundary strategic planning matters including Gypsies and Travellers through the Duty to Co-operate.	Somerset Council.
Diagram: In the Key Diagram (Figure 1), a line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful so it is clear that New Forest National Park, which has its local planning authority does not form part of the Plan area. Alternatively a note under the diagram could helpful.	New Forest National Park Authority.
<b>Concentration of sites:</b> Excessive concentration of sites to a particular area. It is considered that sites should be more evenly distributed across the county of Wiltshire, better use should be made of the transport corridor afforded by the A338 and A346.	Individual x1.

Table 5.12 Policy GT1 - Meeting the needs of gypsies and travellers, and travelling showpeople key issues

Key issues raised (Policy GT1 Meeting the needs of gypsies and travellers, and travelling showpeople)	Respondent(s)
General Comments	
More sites needed: The Plan is an improvement but more sites will be needed.	Individual x1.
<b>Supportive of approach:</b> Generally supportive of the approach taken to meeting permanent and temporary accommodation needs of the traveller communities.	Individual x2.
Support safeguarding: Support safeguarding existing sites.	Individual x1.
<b>Strategy is consistent with national policy:</b> The strategy, specific site allocations and setting an updated criteria-based policy framework, is considered to be positively prepared, justified, effective and consistent with national policy.	Individual x1.
<b>Distribution of sites:</b> The council does not consider that the distribution of proposed allocations and safeguarded aveller sites are likely to raise any significant strategic cross boundary matters or issues for Dorset Council.	Dorset Council
<b>Meeting need:</b> no formal request to Bath and North East Somerset Council to consider helping to address met needs has been issued. Prior discussions indicated the approach of meeting unmet need or household with for those not meeting the planning definition would be within the Wiltshire boundary. This approach is supported by Bath and North East Somerset Council.	Bath and North East Somerset Council
<b>Windfall sites:</b> Bath and North East Somerset Council understands that any unmet need falls within the Wiltshire boundary. However, taking note of further Windfall proposals that may take place, should households from Wiltshire seek to purchase land in Bath and North East Somerset the application would need to comply with local planning policies. Discussions/ongoing collaboration is requested on this matter.	Bath and North East Somerset Council
Planning Definition of Gypsies and Travellers	
<b>Still discriminatory</b> : The planning definition for Gypsies and Travellers was challenged in 2015 but is still discriminatory.	Individual x1.
<b>Approach to meeting need:</b> The approach to meeting the need from households that do not meet the planning definition for Gypsies and Travellers is fairly common.	Individual x1.
Accommodation needs of the whole community: Not including elderly or disabled Gypsies and Travellers does not account for accommodation needs of the whole community and is therefore discriminatory.	Individual x1.

Key issues raised (Policy GT1 Meeting the needs of gypsies and travellers, and travelling showpeople)	Respondent(s)
Approach to meeting need: The approach taken through Policy GT1 to meeting needs is considered to be sound, sensible and pragmatic, and is broadly consistent with approach the Council is taking to meeting needs in South Gloucestershire, set out through its Phase 3 Local Plan consultation document. Notably, Wiltshire's approach and that of the Council diverge as this policy relates only to the needs of those travellers who meet the planning definition of "gypsies and travellers" and "travelling showpeople" as per Planning Policy for Traveller Sites. The needs of those who do not meet these definitions are instead addressed through Policy GT4. The Council however, raises this as an observation and matter of fact only.	South Gloucestershire Council
Monitoring	
<b>Pitch numbers</b> : Careful monitoring should be undertaken if the need for pitches from households that do not meet the planning definition of Gypsies and Travellers is being met, to inform future review of policy and potential for identifying additional sites closely to where need arises.	Individual x1.
<b>Net pitch targets:</b> The supply figures for pitches in para 3.2 of the Plan appear to be invalid and should consider the significant number of newly approved sites and unauthorised sites that have sprung up, thereby reducing the residual need for new pitches down from 81 pitches.	Individual x2.
equality	
Seed for fair treatment for all in relation to planning applications for residential use.	Individual x1.
Stuggested modifications	
<b>Improve clarity:</b> The wording of Policy GT1 is ambiguous. Concerns raised on what constitutes appropriate intensification. The terms authorised sites and safeguarded sites are interchanged and thus should be clarified. What are the parameters that would define the appropriateness of a proposal for intensification? Give a clear expectation on what could be delivered through an intensification proposal.	Amesbury Town Council.
<b>Insert reference to Policy GT3 into Policies GT1 and GT2:</b> Incorporate Policies GT1 and GT2 with specific reference to compliance with policy GT3. Incorporating this into the policy wording would strengthen the policy's effectiveness and soundness.	Amesbury Town Council.

Table 5.13 Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites key issues

Key issues raised (Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites)	Respondent(s)
Highways and Transport (including access)	
<b>Poor accessibility:</b> The nearest pharmacy is over 1km away and other key facilities are not located close to Fairview Park.	Amesbury Town Council.
No specific concerns: No specific concerns regarding soundness or impacts to the Strategic Road Network.	National Highways.
<b>Minimising Traffic Increase:</b> A number of safeguarded sites under Policy GT2 are adjacent to level crossings. Any development that would materially increase levels of traffic using railway crossings should be refused unless their safety will not be compromised.	Network Rail.
<b>Site-specific comment:</b> Specific site at Sunnyside is over-occupied and surface water from the site floods the highway which has not been investigated by Wiltshire Council. It is in the interest of communities that all regulatory requirements are applied equally.	West Ashton Parish Council.
(b)tilities and Drainage	
Brovisions to protect existing utility assets: To ensure that Policy GT3 'New Sites and Intensification of Sisting Sites' is consistent with national policy we would request the inclusion of a policy strand such as: Development should take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.	Avison Young on behalf of National Gas Transmission.
Site Design (including privacy)	
<b>Deletion of Policy</b> : Policy GT2 seeks to propose restrictions on existing sites, particularly 'land at Petersfinger Business Park'. Policy should be deleted alongside any references to safeguarding or protecting sites.	Individual x1.
Other	
<b>Planning definition of Gypsies and Travellers is not inclusive:</b> This definition is still discriminatory of disabled and elderly people being able to live on their own.	Individual x1.
<b>Consideration of cross-boundary impacts</b> : The New Forest National Park Authority welcomes the reference to the consideration of impacts on the New Forest protected areas.	New Forest National Park Authority.
<b>Safeguarding existing sites:</b> New Forest District Council supports the approach to safeguard existing sites and the decision not to identify Blandford Road for intensification.	New Forest District Council.

Key issues raised (Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites)	Respondent(s)
<b>Travelling showpeople need:</b> Swindon Borough Council may request if neighbouring authorities can assist in meeting the need for Travelling Showpeople if they are unable to accommodate a site within Swindon. This issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.	Swindon Borough Council
Plan is sound: Overall the approach to preparing this Plan is sound, sensible and pragmatic.	South Gloucestershire Council.
<b>Unclear which sites are allocated or safeguarded:</b> Some sites allocated for development are also allocated to be safeguarded.	Amesbury Town Council.
<b>Specific quantums of development should be defined</b> : Policy GT2 should specify the specific quantums of development to be allowed at each specific site.	Amesbury Town Council.
<b>Exception:</b> It is unclear how Policy GT2 would support family cohesion. It is also unclear what mechanisms Wiltshire Council has to control intensification.	Amesbury Town Council.
Intensification: Policy GT2 should make clearer reference to which sites are suitable for intensification.	Amesbury Town Council.
Planning history not compatible with proposed development: Previous planning application for intensification of Fairview Park site was objected to for several reasons including utilities connections, access (including sibility) and fire risk. All of these issues still persist.	Amesbury Town Council.
Additional requirements to mitigate noise pollution: Policies GT2 and GT3 should include provisions equiring developments to provide suitable mitigation of noise pollution.	Amesbury Town Council.
<b>Sunnyside</b> : West Ashton Parish Council supports the inclusion of Sunnyside as an allocation; but would like to raise concerns with the level of occupancy at the existing site far exceeding the permitted limit and poor drainage provisions to deal with surface water flooding.	West Ashton Parish Council.

Table 5.14 Policy GT3 - New sites and intensification of existing sites key issues

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
General Comments	
No comment: No comment to make, unaffected by the proposals.	Bristol Water x1
Vehicle access: The plan needs to ensure that all sites are accessible to all types of vehicle.	Melksham Town Council
Opening hours: Site opening hours must be set to allow for late arrivals.	Melksham Town Council
Monitoring: It is unclear how Wiltshire Council will monitor and manage each site.	Grimstead Parish Council
Utilities: Sites need to have all basic services/utilities.	Melksham Town Council
<b>Public Transport</b> : Proximity to public transport, walking and cycling infrastructures, all play a key role in reducing transport emissions. Perhaps, this can be further emphasised in the Site Selection Report.	Gloucestershire County Council
Mitigation of air quality: If there can be an impact to any nearby Air Quality Management Areas because of epolicy. A reference to "Wiltshire Council's Air Quality Action Plan" may also be drawn from.	Gloucestershire County Council
Ste Selection Process: In the site selection process, sites ruled out at Stage 5 should be reconsidered during Sequential Test at Stage 6.	Individual x1
Well-designed sites: It is unclear how Wiltshire Council will meet its objective of providing 'well designed' sites.	Grimstead Parish Council
<b>Protected sties</b> : Policy GT3 should recognise internationally protected sites as well as the potential for appropriate assessment of new sites that have likely significant effects.	Individual x1
Thorough policy: Support Policy GT3 as it is very thorough.	Individual x1
Site Selection Criteria (primary schools): Why are only primary schools considered in site selection criteria?	Individual x1
<b>Approach to meeting need:</b> Agree with the approach to meeting need in the Plan, by way of site allocations and criteria based policy framework.	Individual x1
Site Selection Criteria: Stage 5 reasons for excluding sites should not carry more weight than flooding.	Individual x1
<b>Flood risk</b> : The Plan should state that sites at lower risk of flooding should be developed in preference to those at higher risk.	Individual x1
<b>Modification:</b> Representor proposes a modification that the Plan includes a reference to using the sequential approach for flood risk and those with lower risk being developed in preference.	Individual x1

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
<b>Thorough approach:</b> Policy GT3 is very thorough and covers similar issues to those covered in the draft policy South Gloucestershire Council published.	South Gloucestershire Council
<b>Recognition of protected sites:</b> The recognition of international protected sites in paragraph 3.37 is welcome, although this should be reflected in the wording of Policy GT3 as well as recognition that likely significant effects from any new sites that come forward may need fresh consideration under Appropriate Assessment, as required by the Habitat Regulations. Minor comment: formatting issues xiii to v. Two bullets	New Forest District Council
Site Specific Comments	
Access: No mention of how the tenant farmer will access the field.	Individual x1.
Impact on farming: Development would impact 'organic' farm and its farming practises.	Individual x1.
Schools: Nearby schools are not within walking distance.	Individual x1.
Location: Isolation from the village makes integration into community unlikely.	Individual x1.
Hilities and Services	
comprehensive and Coordinated approach: Policy GT3 should include requirement that development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints could be constraints including utilities situated within sites.	Individual x1.
Water and sewerage infrastructure: Support for reference to water and sewerage infrastructure in Policy GT3 (iv) but should be strengthened to require engagement with water/wastewater companies at the earliest opportunity in accordance with national planning policy and guidance (as set out in the modifications section below):  For any new sites in the Thames Water area, early engagement between the developers and Thames Water would be beneficial to understand: What drainage requirements are required on and off site; Clarity on what loading/flow from the development is anticipated; Water supply requirements on and off site.	Thames Water.
<b>Communication networks</b> : Policy GT3 doesn't cover accessibility to communication networks, mobile data and broadband coverage.	Individual x1.
Poor signal: Poor phone signal in this area which would affect the travellers living at the Site.	Individual x1.
Connection to national grid: National Grid Electricity Transmission notes there is increasing pressure for development sites entering the planning process on land that is crossed by National Grid Electricity Transmission	Avison Young on Behalf of National Grid.

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
infrastructure. They also go on to state a creative approach is required in developing around high voltage overhead lines and other National Grid Electricity Transmission assets.	
<b>Support for access and highways criteria:</b> National Highways particularly welcomes the inclusion of criteria ii, iv, v and ix.	National Highways
Suggested modifications	
<b>Consideration of communities:</b> Update Policy GT3 to include equal respect and consideration in planning for the nomadic and settled community as PPTS.	Individual x1.
<b>Consider site constraints:</b> The inclusion of the following policy strand: "Development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situation within sites"	Avison Young on Behalf of National Grid.
Agricultural land: Policy GT3 should include a requirement to avoid best and most versatile agricultural, unless further suitable sites are available.	Individual x1.
Water/wastewater infrastructure and drainage: Thames Water proposes inclusion of the following in the plicy/section of the Plan:	Thames Water.
"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" and "The Local Planning Authority will seek to ensure that there is adequate water and waste/water 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".	
<ul> <li>"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) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met"</li> </ul>	

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
<ul> <li>"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."</li> </ul>	
• "Surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha)."	
Suggested policy wording	
Supportive of the need to intensify sites but considers wording not strong enough. Amesbury Town Council considers that the policy requirements should be strengthened and made clearer to ensure that the text of the policy is unambiguous and effective. Policy rewording is suggested for some of the criteria:	Amesbury Town Council.
• Criterion iii: The scale of the development should not only be seen in terms of domination of the settled community but also as an urban grain relationship with the settlement. The scale of the development should be appropriate to ensure that it adequately integrates in the wider village, town or countryside. The scale (and layout) of the site should respond positively to the wider settlement pattern and established local character where possible.	
Criterion v: Access to walking and cycling infrastructure as well as public transport would be essential to reduce vehicular trips. Therefore, the policy should refer to the wider transport network, not only to the highway network.	
• Criterion vi: The proposed wording is not strong enough. 'Where practicable' is an undefined term and leads to different interpretations, therefore not being effective in securing the necessary foul water connections to the mains, which are essential for the protection of the environment. Alternative solutions should only be allowed where connecting to the mains is not possible and appropriate conditions should be added to planning permissions to secure an adequate foul water treatment plant as well as management and maintenance.	
• <b>Criterion vi:</b> The proposed wording is not strong enough. 'Where practicable' is an undefined term and leads to different interpretations, therefore not being effective in securing the necessary foul water connections to the mains, which are essential for the protection of the environment. Alternative solutions should only be allowed where connecting to the mains is not possible and appropriate conditions should be added to planning permissions to secure an adequate foul water treatment plant as well as management and maintenance.	
• Criterion vii: The proposed text is too specific and does not address the negative impact that bins cause to the street scene, the public realm and the prominent presence within residential properties (in this case traveller site). We would recommend rephrasing it to: 'Bin storage should be well integrated, accessible, discreet, safe and secure and aligned with the local Waste Authority collection service.	

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Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
<ul> <li>Criterion viii: The surface water drainage strategy should better align with the Wiltshire Core Strategy's sustainable drainage system principles and require a management and maintenance scheme, to ensure its long-term durability. The policy requirement, as currently worded, is not strong enough as to secure an effective surface water drainage system and the adequate responsibilities that would ensure its long-term viability.</li> </ul>	
• <b>Criterion x:</b> It would be important, to ensure the appropriate living conditions of gypsies and travellers on site that the policy refer to the potential impacts of nearby uses on the gypsy and traveller site. Neither the development, nor the nearby uses and activities should result in unacceptable levels of noise, air quality, and light pollution. Referring to nearby uses and activities would be necessary to ensure that there is no intensification of use (more residents) where there are inadequate living conditions due to uses nearby that disturb living conditions.	
<ul> <li>Criterion xiv: Adequate management and maintenance of buffers should be included in the policy to secure their long-term life.</li> </ul>	

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Table 5.15 Policy GT4 - Meeting the needs of gypsies and travellers for culturally appropriate accommodation key issues

Key issues raised (Policy GT4 Meeting needs of gypsies and travellers for culturally appropriate accommodation)	Respondent(s)
Monitoring	
Monitoring for pitches and households that do not meet the planning definition: The approach taken in terms of local authorities addressing requirements of Gypsies and Travellers who do not meet the national Planning Policy for Traveller Sites planning definition is fairly common. It is suggested that careful monitoring should be undertaken for pitches and households that do not meet the planning definition. This information will inform Policy reviews and the demand for sites.	Bath and North East Somerset Council
Support	
<b>Support the approach:</b> New Forest District Council supports the approach for traveller households who do not meet the definition and safeguarding existing sites.	New Forest District Council

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Table 5.16 Policy GT5 - Emergency Stopping Sites key issues

Key issues raised (Policy GT5 - Emergency Stopping Sites)	Respondent(s)
Monitoring of Future Emergency Stopping Sites	
<b>Appropriate Assessment Screening:</b> Trusts that Appropriate Assessment screening to ascertain impacts on internationally protected sites will be a consideration in site selection.	New Forest District Council.
<b>Monitoring Emergency Stopping Site Need:</b> No need for a formal public transit site in South Gloucestershire currently. But the situation should continue to be monitored and management-based approaches such as negotiated stopping should be considered.	South Gloucestershire Council.
<b>Broad location of search:</b> Dorset Council notes the broad location of search in the south east of Wiltshire Council area for emergency stopping sites. This search extends up to the shared boundary between Dorset and Wiltshire Councils. Dorset Council would welcome the opportunity for further constructive and active engagement on this issue as part of ongoing co-operation between the councils.	Dorset Council

# **Gypsies and Travellers Development Plan Document Section 4: Site Allocations**

- 5.24 Please see below the key issues table listing the key issues raised for the part of the plan within section 4: Site Allocations namely:
  - Site Allocations
  - Site Intensifications
  - Policy GT6: Braemar and Braemar (2)
  - Policy GT7: Calcutt Park
  - Policy GT8: Dillons Farm
  - Policy GT9: Easton Lane
  - Policy GT10: Lansdowne
  - · Policy GT11: Oak Tree Field
  - Policy GT12: Poplar Tree Residential Park
  - Policy GT13: The Poplars
  - Policy GT14: Rose Field Caravan Site, Hullavington (No representations received)
  - Policy GT15: Land South of Bridge Paddocks
  - Travelling Showpeople (No representations received)
  - GT16: Land opposite the Laurels
  - GT17: Land adjacent Nursteed Park
  - GT18: Petersfinger Business Park
  - Site Allocations to meet pitch needs from households that do not meet the planning definition
  - GT19: Former Glenville Nurseries (No representations received)
  - GT20: Greenfield View, Leigh
  - GT21: Land at Capps Lane
  - GT22: Melbourne View
  - GT23: 79 Southampton Road
  - New Site Allocations
  - GT24: Bushton North Farm
  - GT25: Land at Housecroft Farm (1)
  - GT26: Land at Housecroft Farm (2) Edington Road, Edington
  - GT27: Land at Cleverton, Cleverton
  - GT28: Land at Oxhouse Farm, Rowde

- GT29: Land at Upper Seagry Farm, Upper Seagry
- GT30: Land at Whistley Road, Potterne
- GT31: Land at Thickthorn Farm, Preston Lane, Lyneham

**Table 5.17 Site Allocations key issues** 

Key issues raised (Site Allocations)	Respondent(s)
<b>Environmental impacts:</b> Concerned about the sewerage going into the local environment and nature by destroying hedgerows to create bigger access into field to get mobile homes in.	Individual x1.
Pollution concerns: Concerned about noise, light and smell pollution from generators.	Individual x1.
Loss of farmland: Loss of farmland from our local farmers.	Individual x1.
<b>Surface water:</b> Concerned about concrete pads for mobile homes displacing surface water and discharge of water from the site itself creating a higher risk of flooding to road and properties at a lower elevation to the proposed site.	Individual x1.
<b>Local amenities:</b> The site is not close to local amenities, shops, doctors, schools and there is no public transport. Therefore cars would have to be used creating more traffic and pollution on a small country road which goes against council policy.	Individual x1.
Blood zones 2 and 3: The majority of the proposed site allocations (Policy GT6 - GT31) be located outside of flood zones 2 and 3 however, there are a few site allocations that are located in close proximity to current flood zones 2 and 3. As we do not know the full extent of future flood zones we advise that the document requires planning applications to include a sequential approach to site design, ensuring that all built development is outside flood zone 2 and 3.	Environment Agency.
Support the Policy	
<b>Policy support:</b> Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council
<b>Site allocations:</b> Specific site allocations are made under Policies GT6 to GT30 and include existing sites identified as suitable for intensification as well as having new sites. With regards to the proposed new sites, these appear to be in locations and of a scale that is unlikely to impact the SRN. Any site specific applications that come forward through the planning process will be considered based on network conditions and their merits under the prevailing policy at the time.	National Highways
Objection	

Key issues raised (Site Allocations)	Respondent(s)	
Concentration of sites in West Wiltshire: There is an excessive concentration of sites in West Wiltshire. The plan should make better use of the A338 and A346 transport corridor. There is no need to concentrate sites along the A350 as in the current plan.		
Improvements		
<b>Brownfield sites:</b> Brownfield sites should have been identified for the Gypsies and Travellers sites as there are a lot of industrial estates which would provide better access.	Individual x1	

Table 5.18 Site Intensification key issues

Key issues raised (Site Intensification)	Respondent(s)
nfrastructure	
Policy should ensure that developments do not impact utility assets: National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9) and Frampton Farm. Need to ensure that Policy GT3 is consistent with national policy and would request the inclusion of policy strand such as; "Development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites". National Grid Electricity Transmission are happy to provide advice and guidance to Wiltshire Council concerning their networks.	Avison Young on behalf of the National Grid
General Comments	
Support site intensification: Supportive of the approach to maximise capacity and potential of existing sites, subject to environmental, heritage and landscape on straints.	New Forest District Council
<b>Expactive approach:</b> It is noted Wiltshire Council is generally proactive in taking we sites and changes to existing sites (such as intensification) forward, unless they do not comply with their Local Plan Policies.	
102 Melksham Forest Farm 1 and 103 Melksham Forest Farm 2	
<b>Support:</b> Support elimination of the Forest Farms for the reasons supported in the site selection report.	Melksham Without Parish Council

Table 5.19 Policy GT6 Braemar and Braemar (2) key issues

Key issues raised (Policy GT6 Braemar and Braemar (2))	Respondent(s)
Site Design	
<b>Support</b> : Support the allocation of five further pitches. There will be a number of children who will require accommodation in the next few years and this allocation will ensure that their needs are met.	Individual x1.
Request for consultation where required: The MOD recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT6 it is affected by the MOD Boscombe Down (height, birdstrike safeguarding zones) and Central WAM Network (technical safeguarding zone).	Ministry of Defence
River Quality and Biodiversity	
Support cross boundary mitigation: The New Forest National Park Authority welcomes the reference to New Ferest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
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Table 5.20 Policy GT7 - Calcutt Park Key Issues

Key issues raised (Policy GT7 - Calcutt Park)	Respondent(s)	
Support the Policy		
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.	
<b>Unlikely to impact the A419 junction:</b> The allocation is for 1 additional pitch created through the sub - division of an existing pitch. We consider this scale of intensification is unlikely to impact on the nearby A419 junction.	National Highways.	
Other		
Existing sites close to Cricklade: No clear reference to existing sites in neighbouring authorities that are close to Cricklade.	Cricklade Town Council.	
<b>Monitoring of sites:</b> Anecdotal evidence that not all sites are occupied by the travelling community e.g. Two traveller sites at Tadpole lane. How is it to be monitored?	Cricklade Town Council.	
Wilities and Drainage		
mood Zone 2: Policy GT7 Calcutt Park contains small amounts of Flood Zone 2. Any residential accommodation must not be located within current Flood Zones 2 and 3.	Environment Agency.	
<b>Proposed allocations are outside flood zones 2 and 3:</b> The majority of the proposed site allocations (Policy GT6 - GT31) are located outside of flood zones 2 and 3 however, there are a few site allocations that are located in close proximity to current flood zones 2 and 3. As we do not know the full extent of future flood zones we advise that the document requires planning applications to include a sequential approach to site design, ensuring that all built development is outside flood zone 2 and 3.	Environment Agency.	
Site Design		
<b>Consultation requirement:</b> Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.	
Development to be formed temporarily if environment attractive to bird species:  Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	MOD - Defence Estates Organisation.	

Table 5.21 Policy GT8 - Dillons Farm key issues

Key issues raised (Policy GT8 - Dillons Farm)	Respondent(s)	
River Quality and Biodiversity		
Reference to New Forest Protected Sites: Welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest Park Authority.	
Site Design		
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.	

Table 5.22 Policy GT9 Easton Lane key issues

Key issues raised (Policy GT9 - Easton Lane)	Respondent(s)
Utilities and Drainage	
<b>Utilities and Drainage:</b> Under Policy GT9, Easton Lane is required to provide sufficient drainage, sufficient landscaping and retention of 25m wide habitat adjacent to the railway lines. Network Rail would expect to be consulted on plans relating to this site to ensure any works do not adversely impact the railway and are to Network Rail standards.	Network Rail.
<b>Environmental Permits:</b> Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.	Environment Agency.
National Grid: National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9) and Frampton Farm. National Grid Electricity Transmission would like to ensure that Policy GT3 is consistent with national policy and would request the inclusion of policy strand such as: "Development would take a comprehensive and co-ordinated approach to development including respecting sisting site constraints including utilities situated within sites" National Grid Electricity Transmission go on to the they are happy to provide advice and guidance to the Council concerning their networks.	Avison Young on behalf of the National Grid.
bandscape	
Proper management of pollution and contaminants: The developer would need to ensure not to create unacceptable risk of pollution from any contamination that might exist. Any groundworks that have potential to disturb waste deposits, disposal of surface water leading to mobilisation of contaminants.	Environment Agency.
<b>Contamination Risk Assessment:</b> The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination.	Environment Agency.
Site Design	
Support: In support of the pitch and site allocation.	Corsham Town Council, Individual x1.
<b>Ministry of Defence:</b> The site is within the safeguarding zones for two Ministry of Defence sites; RAF Colerne and RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the MOD, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.	Ministry of Defence - Defence Infrastructure Organisation.

Key issues raised (Policy GT9 - Easton Lane)	Respondent(s)
<b>Fly-tipping:</b> Rubbish and fly tipping are already an issue. Concern that the presence of the site will make this worse.	Individual x1.
Impacts to wider area: Concerns raised on the impact on the surrounding area.	Individual x1.

## Table 5.23 Policy GT10 - Lansdowne key issues

Key issues raised (Policy GT10 Lansdowne)	Respondent(s)
Site Design	
<b>General Support:</b> Supports the inclusion of additional pitches on the site given growing need for family accommodation.	Individual x1.
<b>MOD Safeguarding Zones</b> : Where sites are located within the relevant safeguarding zones (GT10 is located in the RAF KEEVIL Safeguarding zone), if any development exceeds 45.7m in height, the MOD will need to be consulted upon.	

## Table 5.24 Policy GT11 - Oak Tree Field key issues

Key issues raised (Policy GT11 - Oak Tree Field)	Respondent(s)
Site Design	
<b>New Forest Protected Sites:</b> The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
<b>Consultation with MOD:</b> The MOD recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT11 it is affected by MOD Boscombe Down (height and birdstrike safeguarding zones) and the Central WAM Network (technical safeguarding zone).	MOD.

## Table 5.25 Policy G12 - Poplar Tree Residential Park key issues

Key issues raised (Policy GT12 - Poplar Tree Residential Park)	Respondent(s)
Site Design	
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.
<b>Bird strike</b> : Development may result in creation/temporary creation of attractant environments for large and flocking bid species hazardous to aviation.	MOD - Defence Estates Organisation.
Approval: Happy to accept policy allocation.	Individual x1; Southwick Parish Council.
Landscape	
Hedging: Members are disappointed that much of the hedge has already been removed.	Southwick Parish Council.

Table 5.26 Policy GT13 - The Poplars key issues

Key issues raised (Policy GT13 - The Poplars)	Respondent(s)
Site Design	
<b>MOD Safeguarding Zones:</b> The site is within the safeguarding zones for RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the MOD, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.	
<b>Planning status of site:</b> Concerns raised that the site will no longer be designated a Gypsy and Traveller site with regard to further planning applications.	Individual x1.
<b>Extension of Site:</b> Concerns raised over the extension of the site and its location between Sand Pit Lane, the railway and the public bridleway. The current area is fully occupied.	Individual x1.
Bighways and Transport	
Cocated away from local services: The site is remote from all local services.	Individual x1.

## Table 5.27 Policy GT15 - Land South of Bridge Paddocks key issues

Key issues raised (Policy GT15 - Land South of Bridge Paddocks)	Respondent(s)
Site Design	
Overall need: There is a need for new Gypsy and Traveller pitches for families.	Individual x1.
<b>Existing adjacent Gypsy and Traveller Site:</b> This site is located next to a site that is currently occupied by Gypsies and Traveller however is not owned by these families living on the land adjacent.	Individual x1.

## Table 5.28 Policy GT16 - Land Opposite the Laurels key issues

Key issues raised (Policy GT16 - Land Opposite the Laurels)	Respondent(s)
Site Design	
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
<b>Bird strike</b> : Development may result in creation/temporary creation of attractant environments for large and flocking birds species hazardous to aviation.	Ministry of Defence - Defence Estates Organisation.

Table 5.29 Policy GT17 - Land adjacent Nurstead Park key issues

Key issues raised (Policy GT17 - Land adjacent Nursteed Park)	Respondent(s)
General Comments	
<b>Ministry of Defence Safeguarding Zones:</b> The site is within the safeguarding zones for RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the Ministry of Defence, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.	Ministry of Defence - Defence Infrastructure Organisation.

Table 5.30 Policy GT18 - Petersfinger Business Park key issues

Key issues raised (Policy GT18 - Petersfinger Business Park)	Respondent(s)
General Comments	
Consultation requirement: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
<b>Development to be formed temporarily if environment attractive to bird species:</b> Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Ministry of Defence - Defence Estates Organisation.
Comments of Support	
<b>New Forest protected sites:</b> The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
<b>Blicy support:</b> Support for the proposed allocation of one additional travelling show people plot at Petersfinger supports in accordance with the identified need.	Individual x1.
Accessibility: Access is directly from the A36 to the south - east of Salisbury. This allocation is for a single ditional travelling showpersons plot, although the supporting text does note an identified potential future need by teenagers. The plan considers that space exists within the site (with some reconfiguration) to accommodate this need. Whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing A36 access arrangements, National Highways would stress that any re - arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.	National Highways.
<b>Promotion of land:</b> Promotion of land immediately adjacent to south - east of Petersfinger Business Park which is suitable, available and viable for travelling show people and can accommodate 3 plots to meet the identified need.	Individual x1.
Comments of Objection	
<b>Does not consider the impact on settled residents:</b> The Wiltshire Gypsies and Travellers Development Plan has not been created in consultation with local communities and does not consider the impact on settled residents living in the immediate environs of the areas proposed.	Clarendon Park Parish Council.

Key issues raised (Policy GT18 - Petersfinger Business Park)	Respondent(s)
<b>Legislation and guidelines have not been effectively considered:</b> Wiltshire Council have not effectively considered the impact of the Gypsies and Travellers Development Plan on other legislation and guidelines including but not limited to; net zero targets, noise pollution requirements and flooding and infrastructure requirements.	Clarendon Park Parish Council.
Flood Risk	
<b>Flood Zones 2 and 3:</b> Petersfinger Business Park contains small amounts of flood zone 2 and 3. Any residential accommodation must not be located within flood zones 2 and 3 on the above sites.	Environment Agency.

Table 5.31 Policy GT20 - Greenview, Leigh key issues

Key issues raised (Policy GT20 - Greenfield View, Leigh)	Respondent(s)
Site Design	
<b>Ministry of Defence Safeguarding Zones:</b> The Ministry of Defence recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT20 it is affected by RAF Fairford (height and birdstrike safeguarding zones).	·
<b>Site can accommodate allocation:</b> Support the policy as since the Gypsy and Traveller Accommodation Assessment interview was conducted a need now exists for 2 pitches. There is adequate space to accommodate them.	Individual x1.

Table 5.32 Policy GT21 - Land at Capps Lane key issues

Key issues raised (Policy GT21 - Land at Capps Lane)	Respondent(s)
Site Design	
Extra Pitch Required: Another pitch would be beneficial for teenagers to move onto.	Individual x1.
Development Height: Development of/exceeding 15.2m will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
<b>Bird Strike:</b> Development may result in creation/ temporary creation of attractant environments for large and flocking birds species hazardous to aviation.	Ministry of Defence - Defence Estates Organisation.
Approval: Happy with site selection, no objection to policy.	Bratton Parish Council.

Table 5.33 Policy GT22 - Melbourne View key issues

Key issues raised (Policy GT22 - Melbourne View)	Respondent(s)
Utilities and Drainage	
<b>Environmental Permits:</b> Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.	Environment Agency.
Landscape and Amenity	
<b>Contaminated Land Risk Assessment:</b> The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination. The developer would need to ensure not to create unacceptable risk of pollution from any contamination that might exist. Any groundworks that have potential to disturb waste deposits, disposal of surface water leading to mobilisation of contaminants.	Environment Agency.
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Table 5.34 Policy GT23 - 79 Southampton Road key issues

Key issues raised (Policy GT23 - 79 Southampton Road)	Respondent(s)	
General comments		
Consultation requirement: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.	
<b>Development to be formed temporarily if environment attractive to bird species:</b> Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	MOD - Defence Estates Organisation.	
<b>New Forest protected sites:</b> The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.	
Comments of objection		
Does not consider the impact on settled residents: The Wiltshire Gypsies and Travellers Development Plan has not been created in consultation with local communities and does not consider the impact on the immediate Divirons of the area proposed.	Clarendon Park Parish Council.	
Legislation and guidelines have not been effectively considered: Wiltshire Council have not effectively solutions are single or the Gypsies and Travellers Development Plan on other legislation and guidelines including but limited to; net zero targets, noise pollution requirements and flooding and infrastructure requirements.	Clarendon Park Parish Council.	
<b>Consultation with local communities:</b> Wiltshire Council have not effectively complied with their own aims as set out in the preamble to the document to "Reduce tensions between traveller and settled communities in plan - making and decision taking" as consultation with affected settled communities has been extremely limited given the highly emotive topic under consideration.	Clarendon Park Parish Council.	

Table 5.35 Policy GT24 - Bushton North Farm Key issues

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Highways and Transport (including Access)	
<b>Key facilities can only be accessed by car:</b> Education and health facilities are 4km away and only accessible by car. This will not assist with the objectives of improving health and educational attainment and attendance. The allocation will also not meet the terms of Policy GT3.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
<b>Isolated from public transport:</b> Location is isolated with an absence of public transport would increase reliance on private vehicles to access services/amenities.	Cllr Allison Bucknell; MFS Resolutions on behalf of Shillings Enterprises Ltd; Individuals x9.
<b>Nearest bus stops are too far away:</b> The nearest bus stops are 3.5kms to the north of the proposed allocation, or in Lyneham, over 4kms away.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
bus routed servicing this site: The area is not served by bus routes so the only way to access services would be by car, bike or on foot. The cost of getting children to school from the site with no public transport in repetuity.	Clyffe Pypard & Bushton Parish Council.
Spsafe unlit access: Access to site unsafe as an unlit, 60mph road.	Cllr Allison Bucknell; Individual x1.
Increase in traffic: Development would remove off-road access to North Farm, resulting in an increased use of local roads for farm vehicles/machinery.	Rj and Nj Clarke Ltd; Individuals x5.
<b>Road is used as rat-run</b> : Breach Lane is regularly used as a cut through for traffic between Royal Wootton Bassett and Calne and traffic does move at or in-excess of 60mph limit.	Individual x1.
Road is not large enough to accommodate large vehicles: Breach Lane is a Class C road and is not suitable to accommodate the largest vehicles that will be required to access the site, as such it should be considered the site would have an unacceptable impact on highway safety.	Individuals x2.
<b>Size of site does not accommodate safe vehicle use</b> : Size of the site does not provide space required to allow safe vehicle use, when taken into account with the 'Designing Gypsy and Traveller Sites Good Practice Guide', as well as accommodate the need to provide 10m hedgerow offsets.	Individual x1.
Alternative access is not fit for purpose: Alternative access if proposal goes ahead is not fit for purpose and would require filling in of ditches and hedgerow removal to ensure clear access/egress on a busy road.	Rj and Nj Clarke Ltd; Individual x1.
<b>Tenant farmer is reliant onsite for access to farm:</b> Tenant farmer is reliant on this field to gain access to 80 acres of the farm, this access would need to be maintained, there is no mention of this in the policy. A suitable	

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
access should be designed to suit all needs, without significantly changing the appearance of the lane. The score for this category should be changed to moderate adverse effects.	
<b>Pedestrian travel from site will be unsafe:</b> Pedestrian travel from the site would be along fast, narrow lanes without streetlighting or pathways.	Engage Technical Solutions Ltd; MFS Resolutions on behalf of Shillings Enterprises Ltd; Clyffe Pypard & Bushton Parish Council.
Use of farm access would harm viability of farm: The farm access from Breach Lane being shared with the traveller site may have a wider impact on the viability of the farm holding.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
<b>Separate access will be needed:</b> A separate access will need to be created to ensure the site can be accessed safely, to ensure the existing access to the farm can still be used from Breach Lane. It would not be safe for it to be a shared access, the RAG score should be Moderate Adverse Effects.	Clyffe Pypard & Bushton Parish Council.
Public Right of Way CPYP3: Public Right of Way CPYP3 is located to the south of the proposed site and is not accessible without using Breach Lane. Safe pedestrian access to the site cannot be provided as there are no pedestrian walkways accessing the site.	Individual x1.
Redestrian travel and safety concerns: No bus services and residents would be walking or cycling on narrow menes or they would be obliged to use their own private vehicle.	Individuals x2.
sruption to traffic flow: Significant disruption to traffic flow will occur.	Individuals x2.
Utilities and Drainage	
Financial costs of connecting to mains: Cost to connect to mains power would be high.	Individual x1.
Lack of mains sewer connection: Concern over absence of mains sewerage. Due to the proposed site being on clay, output from any on-site sewerage treatment plant is highly likely to present a risk to local ecology. Any solution removing foul waste on a regular basis would impact the ongoing site costs.	Clyffe Pypard & Bushton Parish Council, Individual x2.
<b>No evidence of drainage strategy:</b> There is no evidence of a drainage strategy to demonstrate the suitability of any of the proposed foul drainage strategy.	Individual x1.
<b>Financial implications of drainage and utility connection:</b> Lack of electricity and mains sewage would present a prohibitive cost to development. No evidence that 'the site can enable off-grid power supply and off-grid foul drainage', as stated in the document, in a sustainable and ecologically sensitive way. This does not meet the criterion to 'provide sufficient drainage measures to manage surface and foul water drainage', as stated in Policy GT3.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>No existing drainage and sewer connections</b> : Site is unsuitable due to no foul water drainage or mains power being available at the site.	Cllr Allison Bucknell; Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council; Individuals x6.
<b>Pumping Station will be required:</b> It appears the site is below the level of the nearest sewer, thus a pumping station would be required, assuming there is capacity.	Individuals x2.
<b>Cost of mains connection will be prohibitive:</b> The policy suggests the site could be served by off-grid electricity generation. The cost of mains connection would be prohibitive. It is not clear what sort of off-grid solution would be effective or required.	Cllr Allison Bucknell.
Challenges with on-site sewage solution: An onsite sewage system would likely need to be installed, due to the existing nearest connection being 0.7km away. There are associated challenges should an onsite system need to be installed. Concerns that any outflow, combined with water run off from highways and saturated land could result in foul water entering local streams.	Cllr Allison Bucknell.
Reed-bed system at full capacity: Bushton has a reed-bed system which is at full capacity, it would not be able to service any potential new development.	Individual x1.
Rainage field will be needed: If the site had a 'small sewage treatment plant, which would need an associated rainage field', and it failed the only possible route for sewage discharge would be the field immediately below the site, the Woodyard business and stabling beyond. The impermeable clay subsoil discounts the possibility of a soak-away arrangement. The increased risk of flooding and/or accidental/negligent sewage discharge from any treatment plant to the business at the Woodyard has not been accounted for and cannot be mitigated against.	Individual x1.
Mains sewer connection is not possible: The development cannot be connected to a mains sewer and no satisfactory alternative foul drainage solution can be achieved.	Individual x1.
<b>Distance from essential infrastructure:</b> Essential infrastructure and services, including foul drainage are 700m away from the site, according to the 'Site Selection Report'.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Lack of infrastructure: No mains power or mains sewerage near the site and the site is below the level of the nearest sewer.	Engage Technical Solutions Ltd; Individuals x2.
<b>Distance from nearest power mains:</b> Nearest mains power is 540m away and possibly prohibitive. It is not clear if there is capacity, therefore a local solution would be required.	Clyffe Pypard & Bushton Parish Council.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>Inadequate existing drainage solution:</b> Land drainage system around Breach Lane is already inadequate with surface water settling on the road even after short periods of heavy rainfall. The inadequate diameter of the drainage pipe running under the land outside the Woodyard is responsible. If the capacity of the pipe was increase this would increase the water flow across the land, there is no obvious solution to this issue. Due to clay in the area little rainwater permeates the ground and it drains off the land as surface water.	Individual x1.
<b>Increase in surface water:</b> Increase in surface water from the site would likely impact neighbouring fields and businesses. Possible impact on pond in adjoining field alarming.	Individual x1.
Caravans are vulnerable to flood risk: The site is poorly drained and prone to groundwater flooding. The National Planning Policy Framework notes caravans are particularly vulnerable to flood risk and seeks to steer most forms of development away from such areas.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Hardstanding site will increase flood risk elsewhere: Hardstanding at the proposed site would speed the run-off of floodwater from the fields and would threaten the woodyard operation. A dwelling nearby to the site was seriously flooded in the summer of 2002 due to the rainwater running off the land towards the dwelling due to the dry clay subsoil.	Clyffe Pypard & Bushton Parish Council.
Correctly identified river catchment: In the assessment the site is described as outside the river Avon Setchment which is incorrect as it drains into the Brinkworth Brook and ultimately to the River Avon. The likely sebility to connect to mains sewage is cause for concern as the risk of contamination could be high, the RAG secore should be Major Adverse Effects. The drainage for the north of the site is downhill towards the pond 100m away.	Clyffe Pypard & Bushton Parish Council.
<b>Site is prone to flooding:</b> Site is partial to flooding due to soil being blue clay based and on a south-east slope. Water runs into a maintained ditch system which leads to east side of Bushton village, flooding occurs on a regular basis in two locations on Royal Wotton Bassett Road. The field is within the boundary of the Brinkworth brook catchment, Wessex Water have been working to help maintain areas within the catchment.	Rj and Nj Clarke Ltd, Individual x1.
Roadside ditches are not maintained and therefore increase flood risk: Poor maintenance of roadside ditches have left properties in Breach Lane flooded. There does not appear to be proposals to ensure this is not made worse by the development.	Individual x1.
<b>Surface runoff from roads:</b> Road between the proposed site and the wood yard floods and the necessary hard standing on the site would increase run off to this road, exacerbating the potential and severity of these floods.	Cllr Allison Bucknell; Clyffe Pypard & Bushton Parish Council; Individuals x2.
<b>Contrary to national policy:</b> No detailed surveys have been carried out at the site. The blue clay subsoil is prone to flooding and does not seem to be a good base for residential caravans and day rooms with footings.	Individual x1.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Paragraph 26c of the National Planning Policy for Traveller Sites states 'opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children' which cannot be achieved on a flood prone site.	
Access roads are prone to flooding: Drainage from the field collects on the road alongside it. Bushton was cut off from Royal Wootton Bassett twice last year due to flooded access roads.	Individual x1.
Considerable upgrades required to site drainage: The land is poorly drained and subject to frequent surface water flooding. Considerable changes will be necessary to upgrade the access.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
<b>Flood Risk:</b> Floods have been experienced on the road between the proposed site and the Wood Yard. Hard standing on the site would increase the run off to this road area, exacerbating the potential and severity of the floods.	Individuals x2.
Site Design (including privacy)	
Landscape impacts: The site is currently greenfield land and the proposal would adversely change the character and appearance of the surrounding area and the amenity of neighbouring properties. The site could be sensitively signed to mitigate any impact.	Cllr Allison Bucknell; Individual x1.
<b>Poes not accord with Good Practice Design Guide:</b> The 'Good Practice Design Guide' shows the layout of each pitch requires a considerable amount of land to accommodate the facilities and playspace with at least 6 metres of separation between each unit of accommodation. Due to the nearest foul drainage connection being 700m away it will have to provided on site. Any sewage treatment plant must be sited a minimum distance from any residential unit, the 0.5 hectare site will prove inadequate.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Landscape	
<b>Light pollution impacts will be unacceptable:</b> It cannot be considered the site will not have an unacceptable impact on noise and or light pollution due to the residential dwellings less than 350m away.	Individual x1.
Impacts to National Landscape: Development of the site would be detrimental to the North Wessex Downs AONB (National Landscape).	Individual x1.
<b>Visible from National Landscape:</b> The site will be visible from the North Wessex Downs Area of Outstanding Natural Beauty and the raised ground to the south of the site (The Hangings), as well as footpath CPYP3 and those using Breach Lane.	Cllr Allison Bucknell; Clyffe Pypard & Bushton Parish Council.
<b>Impacts to National Landscape</b> : The site is close to an Area of Outstanding Natural Beauty and minimising any impact upon that area's setting should be of paramount importance. A traveller site with urbanising features would be a major incursion into the rural area.	MFS Resolutions on behalf of Shillings Enterprises Ltd.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>Development will unacceptably impact the open countryside:</b> Any development of this size in open countryside will have an unacceptable impact, the RAG score of the landscape category should be graded moderate adverse effects.	Cllr Allison Bucknell.
Impact of development: Development would not respect the character of the local area.	Engage Technical Solutions Ltd.
River Quality and Biodiversity	
<b>Ecological impacts</b> : Change of use from agricultural and damaging ecology and is not consistent with sustainability objectives.	Individuals x2.
<b>Known ecological impacts</b> : Site assessment's biodiversity comments identify impacts on ecology and habitats and high-risk area for great crested newts.	Cllr Allison Bucknell, Clyffe Pypard & Bushton Parish Council, Individuals x3.
Biodiversity Net Gain delivery on-site is unlikely: Unlikely that development of this site would deliver 10% Biodiversity Net Gain and would have to be delivered via credits. As such this site should be measured against alternative sites which can deliver Gypsy and Traveller needs whilst achieving on-site Biodiversity Net Gain.	Individual x1.
Spoes not meet Policy GT3 criteria: Does not meet the sensitive habitats, ecology and sustainability criteria new Gypsy and Traveller sites set out in Policy GT3.	Individual x1.
werse ecological impacts onsite and elsewhere: Development will have a detrimental effect on ecology dhabitats on site and in the immediate surrounding areas.	Individual x1.
<b>Foul water disposal may impact biodiversity:</b> Foul water disposal could well effect biodiversity of the flora and fauna of the area together with the environmental balance of the nearby pond.	Cllr Allison Bucknell; Individuals x2.
<b>Site incorrectly identified in River Avon Catchment</b> : The assessment of the site incorrectly states that it lies outside of the River Avon catchment. The field drains through various ditches down to the Brinkworth Brook which leads to the River Avon. The score should be amended to red.	Cllr Allison Bucknell.
<b>No protections against wildlife</b> : The assessment assumes mitigation in relation to biodiversity challenges can be dealt with, however if the site is sold to potential occupants local experience shows that there is no power within the planning process and conditions to protect local wildlife from irreversible damage.	Individual x1.
<b>Historic field pond adjacent the site:</b> The site is recognised in the Plan as an 'ecologically sensitive site'. A field pond on the land adjacent is of significant ecological importance with historical mapping indicating it has existed for hundreds of years.	Individual x1.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>10-metre buffer will limit development:</b> The site is constrained by its 'ecological sensitivity', and for this reason the maximum allocation is no more than 0.5 hectares. A 10-metre buffer around the sites hedgerow boundaries will also reduce the developable area further.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
The site cannot contribute to Biodiversity Net Gain: The site cannot contribute to Biodiversity Net Gain, it does not make it clear who would pay for biodiversity activity elsewhere to achieve neutrality.	Cllr Allison Bucknell, Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
<b>Unclear if Biodiversity Net Gain has been considered or costed:</b> The Site Selection Report calculates that to provide all of the facilities for the pitches, a site with 0.66 hectares will be required. The statutory requirement for Biodiversity Net Gain will have to be provided off-site. It is unclear if this has been considered or costed (National Planning Policy Framework states development must be 'viable') as the replacement biodiversity land needs to be in the close vicinity and of equivalent type.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Site is unsuitable due to unavoidable ecological harm: The Site Selection Report identifies the development would have impacts on ecology beyond the site boundaries' and impacts on ecological habitats 'would be efficult to avoid', this should demonstrate the site is unsuitable for development.	Clyffe Pypard & Bushton Parish Council.
Bamaging the ecology is not consistent with sustainability objectives: Changing from agricultural use and maging the ecology is not consistent with sustainability objectives.	Individuals x2.
Scale	
<b>Site will dominate the locality:</b> The site is close to the proposed emergency stopping site which would constitute a significant increase in local concentration of sites. This will dominate the local community, lead to local resentment and potential conflict with the settled community.	Individuals x3.
<b>Size of site is unsustainable:</b> The proposal is unsustainable as the developed area of the proposed site is 1,560 sqm, representing 24% of the 6,600 sqm land required.	Individual x1.
<b>Site is larger than necessary:</b> The 0.5 hectare proposal for three pitches is larger than necessary for this number of families and would result inevitably expanding beyond the three pitches. It cannot meet the criteria for 'most efficient use of land'	Individual x1.
Other Issues	
Brownfield sites are preferable: Brownfield sites should be identified in preference to greenfield sites.	Individuals x2.
Delivery costs: No delivery costs for council owned sites have been considered.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Council-owned land: Opting for public or council owned land seems to have been given higher priority.	Individual x1.
<b>Unfairness of planning system:</b> Lack of fairness in planning system because a change of use to non-traveller residential use would be refused.	Individual x1
Removal of site: Suggested removal of GT24 Bushton North Farm.	Individual x1
Site does not meet Objective 3: Bushton North Farm does not meet Wiltshire Council's own threshold, specifically Objective 3, for inclusion in the plan as a proposed site.	Individuals x2.
<b>Lack of consultation with landowners and tenant farmers:</b> Site assessed without any site visit or consultation of tenant farmer.	Individuals x2.
<b>Financial impacts to tenant farmer:</b> Proposal will have financial and unsustainable implications on the tenant farmer.	Rj and Nj Clarke Ltd; Cllr Allison Bucknell; Individual x1.
Impact on local area: A new site could impact negatively on the local area.	Individual x1.
ss of good quality Agricultural Land: Making this site allocation will require Grade 2 productive farmland ing taken out of production, and possibly adjoining land to accommodate required Biodiversity Net Gain and wage treatment facilities.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Where suitable brownfield site alternatives: In relation to the question is the Plan justified and does it take into account reasonable alternatives, it is felt it does not. The land is owned by Wiltshire Council and by using this land it is considered the easy option to meet legal requirements at low cost when there are a number of more suitable brownfield sites that could be used.	Clyffe Pypard & Bushton Parish Council.
<b>Isolated from key services:</b> Site isolated from services, particularly medical and schooling, which makes the site unsustainable.	Cllr Allison Bucknell; Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
Lack of street lighting: Concerns raised over a lack of street lighting in the area and also the impact of lighting from the development to promote security and provide safe access. The National Planning Policy Framework makes clear (paragraph 191) that the impact of light pollution from artificial light must be properly controlled. There is no evidence within the consultation documentation that this exercise has been done.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
<b>Isolated from essential services:</b> The site is unsuitable for this use due to isolation from essential services. It is not justified by evidence, it is ineffective and inconsistent with national policy. The proposed allocation for three pitches is therefore unsound in relation to paragraph 35 of the National Planning Policy Framework, the proposal should not be retained within the document being put forward for public examination.	MFS Resolutions on behalf of Shillings Enterprises Ltd.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>Will lead to population increase:</b> If the site of Clyffe Pypard site is approved with North Farm, the population of the parish could be increased by over 10%, and together with the effect of the proposed Thickthorn site, the area would appear to be being treated disproportionately.	Individuals x2
<b>Concerns over impact of development on existing infrastructure:</b> The proposal is not in accordance with paragraph 25 of the National Planning Policy for Traveller Sites.	Individual x1.
Lack of consultation with tenant farmer: National Planning Policy for Traveller Sites 2023 (paragraph 13a) requires that policies 'promote peaceful and integrated co-existence between the site and the local community'. Prior to this consultation there has been no discussion with existing residents or the tenant farmer to identify issues with the proposed site. Without such discussions local knowledge and current experience have not been taken into account or learned from.	Individual x1.
Will result in tensions between settled community and travellers: Development would not respect the character of the local area.	Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
consultation with tenant farmer: There has been no consultation with the tenant farmer whose livelihood dependent on Bushton North Farm, it is unclear if the site was ever visited by planners. The local community byve not been consulted, failing to follow the national Planning Policy for Traveller Sites.	Clyffe Pypard & Bushton Parish Council.
Does not account for unauthorised site at Clyffe Pypard: With the proposed site, the unauthorised site at land north of 34-49 Clyffe Pypard, two further occupied sites on the Bushton to Calne Road and the proposed transit site at Thickthorn the number of sites within this community is already excessive and counter to national Planning Policy for Traveller Sites. It is clear that sites in rural areas respect the scale of the nearest settled community, but the site does not meet this guidance. The score for the scale category should be Moderate Adverse Effects.	Clyffe Pypard & Bushton Parish Council.
<b>Assessment status should be amended:</b> The site assessment score should be considered red overall due to unsafe access for pedestrians and cyclists, vehicular access and increased traffic, site design, landscape, biodiversity net gain and hedgerow/tree concerns and the location of the existing residential houses (which are stated in the report as being 1km away from the site, they are 350m from the site).	Individual x1.
Population increase: The population will increase in the area with the proposed site at Thickthorn.	Individuals x2.
Lack of amenities: No amenities (school, shops, medical etc) within several kilometres of the proposed site.	Individuals x2.
Sustainability Appraisal	
Site doesn't score well: Poor sustainability appraisal, ranking 22nd out of 27 sites.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>Objective 1:</b> Objective 1 should be reassessed as moderate adverse effects, due to the drainage, surface water and reliance on motor vehicles.	Cllr Allison Bucknall.
<b>Objective 2:</b> Objective 2 should be reassessed as moderate adverse effect due to the loss of grade 3 agricultural land with no mains services.	Cllr Allison Bucknall.
<b>Objective 8:</b> Objective 8 should be reassessed as moderate adverse effect as the construction of a 0.5 hectare site with 6 caravans and 3 days rooms will be a significant unwelcome encroachment on the Wiltshire landscape.	Cllr Allison Bucknall.
<b>Objectives 10 and 11:</b> Objectives 10 and 11 should be reassessed as moderate adverse effect as the site is remote from major services and there is no public transport choices.	Cllr Allison Bucknall.
<b>Objective 12:</b> Objective 12 should be reassessed as moderate adverse effect as the site offers poor access to education and training facilities and poor employment prospects.	Cllr Allison Bucknall.
Site is incorrectly assessed: It is contested that several of the categories have been incorrectly assessed and the SA score should be much lower. The site is not sustainable and if an application had come before committee it would have been refused flatly on this basis alone.	Cllr Allison Bucknall.
Score for utilities and drainage: The green score relating to points 3 and 4 (utilities and drainage) do not reflect the reality on the ground and should both be red.	Individual x1.
<b>Expirative 1:</b> Objective 1 should be rated as Moderate Adverse Effects given the issues with connection to mains sewage, surface water run off leading to the River Avon and access to amenities will have to be by car.	Clyffe Pypard & Bushton Parish Council.
<b>Objective 2:</b> Objective 2 should be Moderate Adverse Effect as it is grade 3 agricultural land. The potential concreting of over 24% of this site and its complete loss cannot be Minor Adverse Effect, which diminishes the sustainability case for the site.	Clyffe Pypard & Bushton Parish Council.
<b>Objective 3</b> : Objective 3 should be Moderate Adverse Effect. The site is not in a protected drinking area, the comment that 3 pitches will not adversely affect surface and ground water trivialises the situation. Risk of surface and ground water contamination is high due to likely inability to connect to main sewage. Concern raised over delays in enforcement which may result in contamination of the area for a significant time before action is taken.	Clyffe Pypard & Bushton Parish Council.
<b>Objective 7</b> : Objective 7 is graded as neutral, however the creation of the site viewable from the AONB cannot be neutral. The statement in the plan regarding site layout, design and landscaping helping reduce any adverse effects trivialises in favour of the plan and the impact the site will have on the current landscape. The pitches with caravans, day rooms and solar panels will have an impact on the landscape so a neutral grading is incorrect.	Clyffe Pypard & Bushton Parish Council.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<b>Objective 8:</b> Objective 8 should be Moderate Adverse Effects. The statement regarding the site not encroaching on the local landscape setting or resulting in the loss/harm to existing important landscape features, as with SA7, it is unclear how it can be described as not encroaching.	Clyffe Pypard & Bushton Parish Council.
<b>Objective 10:</b> Objective 10 should be Moderate Adverse Effects. Compared with other allocations they have shorter distances to amenities and these have been graded as Moderate Adverse Effects. The assessment is minimising the sustainability assessment effects in favour of a positive outcome.	Clyffe Pypard & Bushton Parish Council.
<b>Objective 11</b> : Objective 11 should be Moderate Adverse Effects. The site entrance would be onto a class C road, a new entrance would be required due to the busy farm entrance, which would require removal of around 25m of hedgerow. The other two factors of access to sustainable modes of transport and to minimise need to travel to essential services cannot be met.	Clyffe Pypard & Bushton Parish Council.
Objective 12: It is acknowledged that the site offers poor access to education and training facilities and poor employment prospects it is only graded as Minor Adverse Effects whereas Bridge Paddocks has identical wording but is graded as Moderate Adverse Effects.	Clyffe Pypard & Bushton Parish Council.
weighting of Sustainability Appraisal has bias: The Sustainability Appraisal is weighted towards minimising the issues of remoteness from facilities and the impact on the landscape. Based on scores of other similar sites in the plan a more consistent score is -7 with a case to increasing to -9, and if all comments on the site were agreed the score would be -11. When comparing to similar sites a score of -7 shows the site to be sustainably unsuitable.	Clyffe Pypard & Bushton Parish Council.
Sustainability objectives: Does not meet sustainability objectives.	Individuals x2.

Table 5.36 Policy GT25 - Land at Housecroft Farm 1 key issues

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Highways and Transport (including Access)	
<b>Existing traffic concerns:</b> The site is not an appropriate site due to existing traffic and traffic safety concerns due to commuting.	Individuals x10
No access identified: There is no access to the site identified in the plan, including safe pedestrian access.	Individuals x7; Edington Parish Council
Lack of public transport: No public transport to and from the site.	Individuals x3.
Access to agricultural land: Housecroft 1 proposes using an existing agricultural access, which is overgrown but still in place. This is the only agricultural access to the Housecroft Estate fields from the Bratton Road. While not currently in use, this does not mean that agricultural access will not be required from the Bratton Road in future.	Indiviudal x 1.
Utilities and Drainage	
<b>Elecoms:</b> Very poor phone and internet signal at the proposed sites.	Individuals x11; Edington Parish Council.
thilities: The cost of installing new utilities for the site would be too high to justify.	Individual x1.
The site has poor drainage.	Edington Parish Council.
Site Design (including Privacy)	
Close proximity to six other existing gypsy and traveller sites: Housecroft 1 and Housecroft 2 sites are in close proximity to six other existing gypsy and traveller sites one of which is proposed for intensification.	Individuals x2.
Unsuitable location: Site would be unsuitable for normal housing development.	Individual x1.
<b>Poor access to health facilities:</b> The nearest GP surgery is only open part time. Next closest is in Westbury which is approx 9km from the site. Key facilities such as shops and schools and health services. This requirement is set out in the National Planning Policy Framework.	Individuals x19; Edington Parish Council.
<b>Existing nearby sites</b> : Understand that there are already approx six Gypsy and Traveller sites within the vicinity of Edington.	Individuals x11.
<b>No options for further expansion</b> : The proposed number of pitches is the maximum that the site can handle, as per the sustainability analysis. Therefore the site cannot be expanded.	Individual x1.

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Landscape	
<b>Loss of Agricultural land:</b> Proposal will result in loss of land from farm for grazing. Mitigation will still lead to impacts to this.	Individuals x6; Edington Parish Council.
River Quality and Biodiversity	
<b>Protected species:</b> Owls and bats have been sighted near to the Site and the development may affect their habitats. The land provides ecological value.	Individuals x6; Edington Parish Council.
Landscape: The development will harm the landscape especially from lighting impacts.	Individual x1.
<b>Planting:</b> Existing hedgerows have had additional planting of native species to them by farm tenants and therefore the habitat value of the site has not properly been assessed.	Individuals x2.
Incorrect assessment of the site: Incorrect assumptions about the 'low' biodiversity of the Site. Concerns that biodiversity hasn't been properly assessed.	Individual x4; Edington Parish Council.
her	
maware of proposals: Some members of the community were unaware of the plans set out in the Plan.	Individual x1.
Withdraw allocations: The site should be withdrawn from the Plan.	Individual x1.
Intensification is preferred: Existing sites should be increased instead of developing new sites.	Individual x1.
Neighbourhood amenity: Development would potentially harm residential amenity in the village.	Individual x1.
Unsuitable family plots: Plots will be unsuitable for families who are intended to use this site.	Individual x1.
Carbon neutrality: The developments are not carbon neutral.	Individual x1; Edington Parish Council.
Does not accord with other policies: The policy does not accord with Objective 3 of Policy GT3.	Individuals x3.
<b>Brownfield would be a preferred approach:</b> Brownfield sites at industrial estates in Westbury and Trowbridge should be considered.	Individuals x2.
Viability impacts to neighbouring businesses: Development may impact the viability of neighbouring businesses.	Individual x1.
<b>Duty to Cooperate:</b> There is no evidence that Wiltshire Council has had made meaningful consultation with the relevant authorities.	Individual x1.

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Unsustainable level of mitigation: Level of mitigation requires is too large for a small development.	Individuals x4.
National Planning Policy compliance: The policy does not comply with national planning policy.	Individual x1.
<b>No proposed monitoring scheme:</b> No clear monitoring scheme proposed to ensure that occupants of these sites meet the planning definition of Gypsies and Travellers.	Individuals x7.
Sites do not meet Objective 3 of the plan: Neither Housecroft sites meets Objective 3 of the Plan.	Individual x1.
<b>Sustainability of the site:</b> How can these sites be considered 'sustainable' when the size, mitigation and cost will only support two pitches and can only support two pitches in the future.	Individual x1.

Table 5.37 Policy GT26 - Land at Housecroft Farm 2 key issues

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Highways and Transport (including Access)	
<b>Poor public transport access:</b> No access to public transport, sewage network, or medical facilities nearby which will lead to reliance on cars.	Baker-Gadd Partnership; Individuals x4.
Traffic concerns: The site is not an appropriate site due to existing traffic concerns due to commuting.	Individuals x8; Edington Parish Council.
Pedestrian access: The site will not have good or safe pedestrian access.	Individuals x5; Edington Parish Council.
Narrow access: Roads are very narrow near to this site which leads to road safety concerns for pedestrians.	Individuals x5.
<b>Highways safety:</b> The site is located on a remote country road with national speed limit as quoted in the Site Selection Report, and where accidents occur frequently. There are no footpaths and there is no lighting which is inconsistent with the highway/transport criterion in Policy GT3.	Individual x1.
connections to transport or key infrastructure: The proposals are on greenfield sites with no public mansport links, they are not close to amenities and there is no mains sewage. There is a shortage of medical privices in this area and they are out of keeping in this rural area.	Individual x1.
Ŭŧilities and Drainage	
<b>Need for adequate drainage solution:</b> There is no ditch down the north side of the Steeple Ashton to Edington road between the proposed site and the mile stone layby above Ivy Mill Farm, if there is no adequate drainage solution on site then flooding will be increased downhill.	Individual x1.
<b>Poor drainage on-site</b> : Local knowledge would indicate that the clay soil on this site has very poor drainage capability. Water runs from the site either to a nearby ditch or on the roadside. The natural levels of the land makes the risk of contamination of the nearby Milebourne Brook more likely. Infiltration in the winter months would be minimal. The neighbouring land has standing water on it each winter despite a comprehensive drainage system. Surface water run off does occur and adds to pollution risk and flooding risk off neighbouring land.	Individual x1.
Site is not suitable for soakaway drainage solution: The land is not suitable for a soakaway solution so drainage would need to be provided in other ways.	Individual x1; Edington Parish Council.
<b>Telecoms:</b> Broadband connections in the village are limited in their quality and many homes have to use Wi-Fi boosters.	Individuals x3; Edington Parish Council.
No Sewerage connection: There is no on site mains sewage connection.	Individual x1.

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Site Design	
Undue Intensification: This proposal constitutes an undue intensification of the site.	Individuals x2.
Intensification: Intensification of existing sites would be more preferable.	Individual x1.
No opportunities for further expansion of site: The supporting documents state that the proposed development would constitute the maximum capacity for the site meaning it couldn't expand further.	Individual x1.
Neighbourhood amenity: Development would potentially harm residential amenity in the village.	Individual x1.
Landscape	
Landscape: The development of the site will adversely impact the landscape.	Individuals x2.
<b>Site identification approach:</b> Development should not be located on undeveloped greenfield land and instead should be extensions of existing Gypsy and Traveller sites. This is inconsistent with planning policies related to residential development.	Individuals x6.
Aternative brownfield sites: Brownfield land at industrial estates in Westbury and Trowbridge should be positional instead.	Individuals x2.
River Quality and Biodiversity	
Insufficient ecological mitigation: The development will impact existing wildlife nearby to the site and the planting of hedgerows will not mitigate this.	Individuals x5; Edington Parish Council.
Other	
Excessive number of existing sites nearby: Too many sites proposed in this local area.	Individuals x7.
<b>Need for monitoring scheme:</b> No clear monitoring scheme proposed to ensure that occupants of these sites meet the definitions of Gypsies and Travellers.	Individual x1.
Carbon neutrality: The development is not carbon neutral.	Individual x1; Edington Parish Council.
<b>Wiltshire Climate Emergency Strategy:</b> The policy does not support the aims and objectives of the Wiltshire Climate Emergency Strategy.	Individuals x2.
<b>Lack of nearby key facilities:</b> There no facilities such as shops, employment or health facilities within close proximity of the site, these would need to be accessed via car.	Individuals x17; Edington Parish Council.

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Inconsistent and unjustified: The plan is inconsistent with national planning policy and is also unjustified.	Individuals x2.
<b>Unsustainable level of mitigation:</b> Level of proposed mitigation for the site is unsustainable and the financial requirements of such would make the site unviable.	Individuals x7.
<b>Lack of communication of consultation:</b> Some members of the community were unaware of the proposals set out in the Plan. The consultation document is difficult to read.	Individuals x2.
Core Organic Farm: The site is a core organic farm and the development will impact its viability.	Individuals x7.
Viability impacts: Proposed site may impact the viability of neighbouring businesses.	Individuals x1.
Access to healthcare: In relation to accessibility of health centres, the site falls outside the search area defined in the Site Selection Report. The Bratton Surgery only has part time hours so residents would need to access White Horse Health Centre in Westbury.	Individual x1.
pact on the local area: The site does not comply with Policy GT3 as additional sites could impact the local area.	Individual x1.
Betential impacts on residential amenity: Development could impact upon residential amenity.	Baker-Gadd Partnership.
গৈ Sustainability Appraisal	
<b>Sustainability Appraisal:</b> The Sustainability Appraisal has not properly assessed the existing biodiversity of the site.	Individuals x7.
<b>Sustainability of sites</b> : How can these sites be considered 'sustainable' when the size, mitigation and cost will only support two pitches and can only support two pitches in the future.	Individual x1.

Table 5.38 Policy GT27 - Land at Cleverton, Cleverton key issues

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Highways and Transport (including access)	
<b>Poor public accessibility:</b> Lack of footpaths and infrequent bus services. Any travel to essential services would need to be done by car.	Individuals x2.
Traffic congestion: The roads are already congested during peak times.	Individuals x2.
<b>Highways England response:</b> Responses to the Regulation 18 Consultation from Highways England did not account for Policy GT27.	Individuals x1.
<b>Poor bus services:</b> Bus services are irregular and provide poor connection to higher order settlements Great Somerford and Malmesbury.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
On-street parking is not preferable: We do not want more vehicles parking along the roads and verges.	Individual x1.
sibility is insufficient: Further visibility than 160m will be required as vehicles travel 70mph and not 50mph. 60m is not achievable because of road curvature and verge topography. Safe vehicular access cannot be chieved based on distances measured from the access point, which is inconsistent with Policy GT3(iv) in the can.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Increase in vehicular movements: There may be 600-900 vehicle movements per week from the site onto a fast B-road due to the lack of public transport and the number of on-site residents including teenagers, business vans and lorries etc.	Individual x1.
Lack of pedestrian infrastructure: No pedestrian infrastructure is available nor is there any street lighting.	Individuals x9, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Unsafe accessibility:</b> The lack of safe accessibility does not give adequate consideration to the needs of all transport users, accordingly to the established hierarchy: Visually impaired or disabled; pedestrians; cyclists.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Reliance on cars: Pedestrian access is not achievable in this location, exacerbating future occupants' reliance on private vehicles to access services and facilities, and contrary to national strategies for sustainable development. Verges are narrow and uneven and a pavement couldn't be installed safely. It is therefore incorrect	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
for the Site Selection Report to conclude that all types of highway user can safely access the site subject to mitigation.	
<b>No safe pedestrian access:</b> Lack of safe and suitable access for pedestrians contravenes paragraph 108(c) of the National Planning Policy Framework.	Individual x1.
<b>Unsafe pedestrian access:</b> The verges are bordered by deep surface water drainage ditches and it is unsafe to walk along the B4042 given prevailing speeds of 70mph. This contravenes criterion iv) in Policy GT3.	Individual x1; Elected member x1.
<b>Encouraging private car use:</b> In connection with the unauthorised stationing of buses, Section 4d of Enforcement Notice No. ENF/2023/0388 identifies the location as unsustainable and encouraging the use of the private car in contravention of Wiltshire Core Strategy Policies 60 and 61 and Section 9 in the National Planning Policy Framework 2021.	Individuals x2.
<b>Traffic increases:</b> The site will generate truck and caravan movements in addition to private cars and the enforcement case demonstrates the unsuitability of the site access.	Individuals x4; Elected member x1.
The development would result in additional vehicle movements on the Hill and the junction with the B4042 and increase pressure on local roads.	Individuals x2.
blic Transport: There is no public transport.	Individual x1.
<b>Road accident history:</b> Crash map evidence shows 24 no. road traffic incidents over the decade to 2022 in the vicinity, three of which were identified as serious.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Impacts to existing road network:</b> On the basis of 80 vehicle trips per day it is highly unlikely that a safe means of vehicular access can be secured to service the site and quantum of development proposed without harm to the local highway network and its existing users.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x1.
<b>No consideration of vehicle trip numbers:</b> Taking into account other types of vehicle movements and teenage children's accommodation needs which the plan doesn't consider, vehicle trips may amount to 90 or more per day.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Lack of existing facilities:</b> The village lacks necessary facilities to manage the development including waste, health, sanitation and essential services.	Individuals x5; Elected member x1.
Reliance on cars: Residents would have to use the car to reach all necessary services and facilities.	Individuals x2; Elected member x1; Agent on behalf of x1 individual.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Pressure adding to existing key facilities in Malmsbury:</b> Development would add pressure on overstretched local doctors surgeries, and the secondary school at Malmesbury.	Individual x1.
Access to services: Travellers would have insufficient access to services, facilities and amenities.	Individual x1.
Lack of access to sustainable transport: Site is inconsistent with Policies CP60 and CP61 of the Wiltshire Core Strategy and paragraph 4(j) of the national Planning Policy for Traveller Sites. Development is unlikely to obtain planning approval because of the lack of access to sustainable transport in contravention of local and national planning policy. This raises doubts as to the soundness of the Plan.	Agent on behalf of x1 individual; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Utilities and Drainage	
<b>Flooding:</b> Little Somerford as a flooding problem when water washes down from the hill where the site is, this will be exacerbated by effluent run-off from the development as there is no sewer.	Individuals x7.
Utilities infrastructure: There are no services (water, sewer, power) to the site.	Individuals x3.
Sewerage: Sewer connection would be facilitated via third party land and is extremely unlikely. ເປັ	Individuals x5; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Existing sewer is overcapacity: The 150mm sewer on 'The Hill' is running at over capacity with blockage and erflowing problems after heavy rain.	Individuals x8; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Ditches:</b> Ditches need to be kept clear of debris to enable free flowing of rainwater drainage, how will this be achieved?	Individual x1.
Water Pressure: Water pressure is already low in this area of Cleverton.	Individual x1.
Sewage pollution risk: There is a sewage pollution risk to public health and private homeowners.	Individuals x4.
<b>Impermeable soil:</b> The soil on the site is low permeable-impermeable dense clay, floods during the winter months. The soil on the Hill and on the site becomes unstable and water flows into the village which has resulted in flooding during winter months.	Individuals x10; Elected member x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Geology:</b> The site is in a highly vulnerable location for flooding due to the underlying geology (National Planning Policy Framework Annex 3).	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Assumptions of occupation rates are inaccurate:</b> The assumption that 2.5 people live on a pitch is wrong. It should be 4-6 people, so the on site sewage plant would be under-designed. The drainage field should be 1,500 sqm and not 625 sqm as stated in Appendix 1 to the Site Selection Report.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Insufficient proposed sewerage infrastructure:</b> A sewage treatment plant will fail to function and contaminate the ground both locally, down to the village and into the River Avon. This is inconsistent with paragraph 13(f) of the national Planning Policy for Traveller Sites.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Soakaway solution:</b> The flooding and ground instability issues mean that a soakaway system will not work and therefore undeliverable, would result in financial and environmental costs. Policy is inconsistent with paragraph 13 of the national Planning Policy for Traveller Sites.	Individuals x4.
<b>Does not accord with national policy:</b> Flood risk also means the site is not in accordance with Annex 3 of the National Planning Policy Framework and Core Policy 47 of the Wiltshire Core Strategy.	Individual x1.
<b>Pollution:</b> Pollution from the proposed development flowing through the brook down The Hill would create a stentially serious risk to public health, as well as creating noxious smells, something that the local water board (Vessex Water) have had to deal with on a number of previous occasions.	Individuals x3.
Clear if site will be self-sufficient: Given the demand for on-site power to support 10 pitches, concerns as ever whether this be achieved and whether the occupiers of the site will resort to using bottled gas and generators if the cost of upgrading the electrical infrastructure is prohibitive.	Individuals x2.
<b>Water Stressed Area:</b> Regulation 18 Consultation Report feedback from the Water Utility provider has stipulated that the area is classified as "Water Stressed", so further addition of water services to new inhabitants fails to consider the risk to water supply.	Individual x1.
<b>Duty to Cooperate not met:</b> Insufficient joint working was undertaken with utility infrastructure providers under the Duty to Cooperate given the water supply and drainage issues.	Individual x1.
<b>Surface-water runoff:</b> Site is located on impermeable clay which will increase surface water runoff. Numerous flooding events have been reported in this local area.	Individual x7; Lea, Garsdon, and Cleverton Parish Council.
Site Design (including privacy)	
<b>No access layout has been provided to date:</b> No layout and design of vehicular access has been provided. The visual impact of change of use will change the landscape character viewable from the property on the eastern boundary and no consideration has been given how this will be compensated for.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Impacts to appearance of village which goes against Conservation Area Statement: GT27 would have a detrimental effect on the appearance of the village of Little Somerford. It is contrary to the Guidance Recommendations for the Upper Part of The Hill in Little Somerford's Village Design Statement and Conservation Area Statement, which was adopted as Supplementary Planning Guidance on 25th July 2002.	Individual x1.
Overlooking: Site would be overlooked by adjacent properties resulting in inadequate levels of privacy.	Individual x1.
<b>Neighbouring property will be left exposed:</b> The property on the eastern boundary would be made completely vulnerable and exposed due to the lack of mitigation measures such as landscaping, buffers, hedgerow planting and fencing which has been afforded to the southern and western boundary.	Individual x1.
Landscaping may not be effective: On site planting may not work given the waterlogged nature of the site and there is no evidence how landscaping will be maintained, or prevent removal in the future.	Individual x1.
Third Party access rights: Third party access rights affect the land.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Existing Third Party Access rights: Third party access rights would make it impossible to screen the eastern bundary.	Individual x1.
Sevelopment which is of low density.	Individual x1.
<b>Greenfield development does not accord with the Core Strategy:</b> The site is agricultural land, it has not been previously developed and is not a derelict site as required by Core Policy 47 in the Wiltshire Core Strategy.	Individuals x2.
Incompatible with Conservation Area: Incompatible with Little Somerford Conservation Area.	Individual x1.
Site will be visible when hedgerows do not leaf: During the six months of the year when the current mature hedgerows and trees are not in leaf, neighbouring properties are in direct line of sight of the proposed site.	Individuals x5.
<b>Urbanisation of landscape:</b> The site would urbanise the rural landscape, including infrastructure developments and mitigation measures screening measures such as earth bunds, fences and non-native hedgerow and tree species.	Individuals x3.
<b>Privacy:</b> Adequate privacy could be provided only by introducing inappropriately high fences and hedges which would further impact on road safety.	Elected member x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Screening will lead to separation:</b> Site screening would isolate occupants which would not accord with the requirements of the Planning Policy for Traveller Sites.	Individual x1.
<b>Impacts to privacy of residents:</b> The development would have unacceptable impacts on the privacy and residential amenity of property owners adjacent to the site in terms of noise, fumes and light pollution, and mitigation measures proposed in the policy are insufficient to address the issues.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Scale is unjustified:</b> The scale of development in terms of pitches and population is unsound and unjustified when considered against Noise Policy Statement for England because it does not demonstrate the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy.	Individual x1.
Short-medium term impacts of hedgerow planting: Hedgerow removal and replanting would result in short to medium impacts and would be inconsistent with Core Policy 51 of the Wiltshire Core Strategy.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individuals x2.
Public Right of Way: A public right of way (LSOM1) runs close to part of the southern boundary of the site. The shanced hedgerow planting on this boundary will not prevent the site from being visible for six months of the par when the hedgerow is not in leaf, and noise from the site will disrupt the enjoyment of LSOM1 by walkers, entrary to the National Planning Policy Framework (paragraph 104).	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individual x2.
Cumulative impacts with unauthorised site: Development of the site would magnify adverse effects from current unauthorised use on neighbouring property in terms of noise, visibility and amenity.	Individual x1.
Landscape	
<b>Increase in pollution:</b> As this is a rural area, the nights are particularly dark and therefore the development will increase light pollution in the area.	Individuals x2.
<b>Harm to quiet area:</b> As this is a very quiet area development will increase noise pollution impacting the surrounding area.	Individuals x3.
<b>Substantial noise pollution</b> : The noise nuisance experienced as a result from the unauthorised use will substantially increase if 10 pitches are developed.	Individual x1.
<b>Development would be clearly visible:</b> The development would be clearly visible from the road and nearby footpaths and would substantially alter the character of the area.	Individual x4; Lea, Garsdon; and Cleverton Parish Council.
Adverse impacts to village's character: The site could disrupt the rural character of the village.	Individuals x2.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
The site is part of a dark sky landscape: The site meets the national definition of dark landscape. There is no light pollution from this site at the moment but this would change as a result of development.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Light pollution: Light pollution would affect neighbouring properties during evenings and nights all year.	Individuals x3.
<b>Increase in traffic and pollution</b> : The site will lead to increased traffic, noise, car fumes, and strain on local resources affecting the quality of life for local residents.	Individuals x3.
Air Quality impacts to surrounding properties and no buffer zones proposed: The property on the eastern boundary would be exposed to poor air quality as a result of development including petrol diesel, paraffin fumes, sewage waste, household waste. There seems to be a lack of due diligence on part of the Council to consider this in the policy requirements, for instance there is no mention of buffer zones and separation distances.	Individual x1.
Failure to consider North Wiltshire Landscape Character Assessment: Development would offend Policy CP51 as it fails to consider the North Wilts Landscape Character Assessment which identifies a rich evidence of archaeological features and a largely medieval field pattern, local landscape features including mature bedgerows, trees etc.	Individual x1.
Harm to open-countryside landscape character: The land is open countryside, elevated and characteristic buttle Somerford and Cleverton. The proposed allocation would harm the landscape character of the villages and this could not be mitigated by the measures proposed in the policy.	Individuals x9.
River Quality and Biodiversity	
<b>Great crested newts:</b> Protected species have been observed in neighbouring properties including great crested newts, their habitats therefore may be impacted by the development, noise and light pollution.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Protected species:</b> The presence of protected species makes this site inconsistent with the National Planning Policy Framework (paragraphs) 180, 185, 191) and the national Planning Policy for Traveller Sites (paragraphs 4(k) and 10).	Individual x1.
<b>Enjoyment of wildlife and area</b> : Wildlife forms part of the enjoyment and amenity of living in the area and would be disturbed and discouraged by any development of the site.	Individuals x2.
<b>Significant Biodiversity Loss:</b> Developing this site would result in significant adverse loss of/destruction of biodiverse habitat and valued farmland that is vital for the protection of decreasing insects, plants and animals; food production; carbon capture and community health and wellbeing.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Rare wildlife: The fields surrounding Little Somerford support a broad range of wildlife some of which is very rare.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Brownfield Land: Alternative solutions such as brownfield sites should be explored.	Individuals x2.
<b>Ponds:</b> The site includes two mere ponds and is home to several protected species, including but not limited to butterflies, birds and Great Crested Newts and without ecological surveys buffers cannot be evidenced.	Individual x1.
<b>Does not allow for protection of ecological features:</b> The development of pitches, internal access, parking and turning will not allow for adequate protection of the ecological features.	Individual x1.
Lack of avoidance and mitigation measures: The allocation does not incorporate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. It does not demonstrate it meets the requirements of the national Biodiversity Action Plan and Biodiversity Net Gains. It is not compliant with Core Policy 50 of the Wiltshire Core Strategy.	Individual x1.
ternative Ministry of Defence site: Ministry of Defence land at Lyneham should have been investigated.	Individuals x2.
Stale	
Scale of Little Somerford is unsuitable for this site: Little Somerford is not considered to be a sustainable location as it is not defined as a settlement in Core Policy 1 of the Wiltshire Core Strategy. Most services are at Great Somerford and Malmesbury so the site does not comply with CP47. The scale and character of Little Somerford will be affected.	Little Somerford Parish Council.
<b>Domination of nearest settled community:</b> The proposed site should not dominate the nearest settled community.	Individuals x2.
Consultation has caused distress and social tension: The proposal has created undue pressure on the settled communities causing distress and social tension due to the impacts the site would have on the local community.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Site will dominate settled community:</b> The proposed Gypsy and Traveller site will dominate the local settled community and the wider community of Little Somerford and Cleverton given the number of 40-60 residents on site compared to the number residents in Cleverton and Little Somerford.	Individuals x10; Elected member x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Impacts to neighbourhood amenity:</b> The site will unacceptably impact and cause the loss of amenity to the adjacent neighbouring properties.	Individuals x5, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
<b>Inconsistent with Wiltshire Core Strategy:</b> The scale of growth is not consistent with Core Policy 1 when considered against the number of new dwellings that have been constructed in Little Somerford in the past 20 years.	Individual x1.
<b>Inconsistent with Wilshire Core Strategy:</b> The WCS does not identify Cleverton or Little Somerford as settlements within Core Policy 1; 'settlement strategy'. The impact of development of site GT27 will be to append a significant quantum and intensity of residential pitches to a loose collection of existing dwellings in an area where the LPA have held a policy of strict restraint on development.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
No evidence of affordable plots being considered: Policy D 'Rural exception sites' provides the LPA with the opportunity to allocate small sites as affordable traveller pitch locations to address the needs of existing members of the (travelling) community resident in the area. There is no evidence presented in justification of the allocation of site GT27 that such a need exists in this location.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
es not accord with national policy: The allocation doesn't accord with national planning policy, which equires that local planning authorities to ensure that the scale of rural and semi-rural sites should not dominate nearest settled community.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individual x1.
Eack of pitches: Lack of pitches could lead to increase the number of site residents.	Individual x1.
Other Issues	
Query regarding intention to replace Wiltshire Core Strategy Policy CP47: Query how can a Plan replace a policy.	Individual x1.
Inconsistent with National Policy: The allocation is inconsistent with PPTS.	Individual x1.
Site Assessment Criteria: The plan did not assess the 7 new sites against the criteria in national and local policy	Individual x1.
<b>Imbalance in location of allocations:</b> There is an imbalance of traveller sites in north west Wiltshire when compared to the rest of the county.	Individual x1.
Sites located outside of settlement limits: Site is outside limits of development and hence inconsistent with the strategic policies in the Wiltshire Core Strategy.	Individuals x2.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Does not accord with Wiltshire Core Strategy</b> : Site is not in accordance with Core Policy 44 (Rural Exception Sites).	Individual x1.
<b>Does not accord with Wiltshire Core Strategy:</b> Site is not in accordance with Core Policy 48 (supporting Rural Life).	Individual x1.
<b>Does not accord with Wiltshire Core Strategy:</b> Site is not in accordance with Core Policy 50 (Biodiversity and Geodiversity Protection).	Individual x1.
<b>Site does not meet policy criteria:</b> Site was included due to lack of alternatives put forward but does not meet the planning policy criteria.	Elected member; Individual x1.
<b>Lack of engagement with Parish Council:</b> Overall lack of engagement with Little Somerford Parish Council as a neighbouring authority to this allocation.	Little Somerford Parish Council.
Afternative locations proposed for sites: New gypsy and traveller sites should be located on the edge of ger towns, market towns and large villages with better access to services and facilities, public transport and employment opportunities.	Individual x1.
Sixes should be located within existing housing developments: Traveller sites should be allocated within gige housing developments in Chippenham as done elsewhere for example in Hampshire and Berkshire.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x2.
No evidence that Council-owned land has been considered: There is no demonstrable evidence in the site assessment report of Wiltshire Council owned land/sites/assets and any piece of land being considered and assessed as to its suitability or non-suitability as a Gypsy and Traveller site.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
No evidence that unauthorised existing sites have been considered: There is no indication that existing unauthorised sites have been considered against either Wiltshire Core Strategy Core Policy 47 or the emerging Plan Policy GT3 criteria to assess whether such sites could contribute to the overall pitch requirement.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Inconsistent with Wiltshire Core Strategy Policy: Site location is inconsistent with Wiltshire Core Strategy CP1 and 2 and national planning policy as it is not located at a recognised settlement and in open countryside.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Insufficient site assessment:</b> Site assessment conducted only on a desktop basis with no on the ground surveys.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Inconsistent with national policy:</b> The site allocation contravenes various elements of the National Planning Policy for Traveller Sites.	Lea, Garden and Cleverton Parish Council.
<b>Inconsistent with national policy:</b> Inconsistent with Policy B and C in PPTS, as the scale of the site will represent a dominance of the nearest settled communities.	Individual x1.
Brownfield land would be a preferable approach to site selection: Brownfield and previously developed land is often more readily available around larger settlements and should always be considered first for new gypsy and traveller sites before taking agricultural land out of production.	Individual x1.
<b>Level of mitigation is unsustainable:</b> There are so many mitigation and engineering measures required which are disproportionate to the proposed development rendering site GT27 as financially unviable and undeliverable.	Individuals x4.
Unclear of the Council will monitor each site and required mitigation: Wiltshire Council themselves said they do not have the resources to monitor the implementation of mitigation measures.	Individual x1.
Lack of community engagement: Wiltshire Council have not consulted or engaged with the local community proor to site GT27 being included in the Plan.	Individuals x5; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Community views: Concern over whether the consultation considered the local community's views.	Individual x1.
padequate site assessment: Site suitability was not adequately assessed.	Individuals x3.
<b>Previous planning application rejected at site rendering development of site unsuitable:</b> A new residential dwelling near the site was refused planning permission and the same planning reasons used in the decision should apply to the proposed allocation rendering it unsuitable.	Individuals x3.
<b>Existing enforcement notice served on-site:</b> The enforcement notice about the ongoing use of the land without planning permission gives reasons that the land is not suitable for residential use and this should apply to the proposed allocation rendering it unsuitable.	Individuals x2.
Lack of consideration of enforcement notice: Why did Wiltshire Council consider the site when it is subject to an enforcement notice detailing the issues with the site.	Individual x1.
Amount of time in which a plot can be occupied is not specified: The Plan has not specified the number of days the site can be occupied by more than the allowed number of caravans.	Individual x1.
Sustainability Appraisal	

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Scores poorly: The site scores very badly against the objectives of the Sustainability Appraisal.	Individual x1.
<b>Objectives not met:</b> Objective 3 in the Plan is not met because the site scores poorly against Sustainability Appraisal Objectives 10 and 11.	Individual x1.
<b>Sustainability Appraisal Objective 1:</b> The site should be scored moderately adverse with mitigation unlikely to be achievable.	Individuals x5.
<b>Wildlife corridor:</b> The site is pasture land with wildflowers and endangered species including newts. Constitutes a wildlife corridor.	Individual x1.
<b>Unevidenced claims:</b> The assessment makes unevidenced claims, e.g. grassland unlikely to be of high value but does not provide accompanying evidence that this grassland has been independently valued by a suitably qualified land agent.	Individual x1.
<b>Biodiversity:</b> It makes the claim that it is a significant biodiversity asset but contradicts this with the overall assessment of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than contradicts of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than contradicts this with the overall assessment of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than contradicts this with the overall assessment of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than contradicts this with the overall assessment of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than contradicts and more likely to be increasing to Major.	Individual x1.
survey evidence: No surveys were undertaken by suitably qualified agents.	Individual x1.
<b>Great Crested Newts:</b> It recognizes the site is home to Great Crested Newts and simply considers compensation (with no accompanying evidence to quantify 'expensive') as a suitable option.	Individual x1.
Sustainability Appraisal Objective 2	
<b>No consideration of alternative brownfield land</b> : Wiltshire Council do not appear to have given adequate consideration to the use of previously developed land, as required by the Sustainability Appraisal Framework, including the potential use of Ministry of Defence sites that have been made available for development.	Individuals x6.
<b>Loss of agricultural land:</b> Even if the land is classified as Grade 3b agricultural, it has a value of £7,500 per acre. With a site of 2.7 Hectares (6.67 acres) this represents a value of at least £50,000 of Good to Moderate viable grassland. Loss of such amenity only reduces organic production capability and increases the reliance on foreign imports. These in turn increase Carbon emissions and contribute, rather than take active steps to combat, Climate Change.	Individual x1.
<b>Lack of evidence:</b> It does not provide an evidenced explanation as to why the loss of 2.7 Hectares of Level 3a/b agricultural land would not be considered and offers no basis of comparison. It states that further analysis is required but makes an assumed conclusion without the basis of this evidence being completed.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Sustainability Appraisal Objective 3	
<b>No sewerage connection:</b> The site lacks access to sewerage system and on site treatment would be required which is an additional risk factor.	Individuals x6.
<b>Geology:</b> The assessment ignores the geology at the site which is not conducive to infiltration of surface water and treatment effluent.	Individual x1.
<b>Mains sewer already at capacity:</b> Foul mains connection has not been properly assessed and sewer at 'The Hill' is already at capacity.	Individual x1.
Sustainability Appraisal Objective 4	
Impacts cannot be mitigated: The impact from noise and light pollution will be adverse and cannot be mitigated.	Individuals x5.
Sustainability Appraisal Objective 5	
Rainwater infiltration: Flood risk and effluent/surface water runoff from the site in view of poor infiltration tential, etc. should be considered and the score changed to major adverse, also in light of flood events.	Individual x6.
Sustainability Appraisal Objectives 8	
dgerow removal for safe access: The assessment does not consider the removal of hedgerow for safe access.	Individual x1.
<b>Significant landscape impacts:</b> The open countryside location, proximity of neighbouring properties, the development and screening that would significantly alter the landscape mean that the score is 'major adverse'	Individuals x5.
Sustainability Appraisal Objective 9	
<b>Isolated site:</b> The isolated nature of the site contributes a major (significant) negative effect rather than being a moderate (significant) positive effect which is put forward by the Sustainability Appraisal Appendix B.	Individual x1.
Occupants will remain isolated: The Sustainability Appraisal claims that proximity to Little Somerford facilitates integration but this is insufficient in the absence of a concrete plan so the occupants would potentially be isolated.	Individual x1.
Sustainability Appraisal Objective 10	
Lack of public and pedestrian accessibility: People cannot walk into a settlement without considerable risk due to the lack of pedestrian infrastructure and regular bus services, and are isolated from essential facilities,	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
amenities and services. This is not a neutral effect as proposed by the Sustainability Appraisal Appendix B, this is a major (significant) negative effect.	
<b>Local facilities access:</b> Access to local facilities other than a pub, village hall and church will in practice require private transport.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Poor access to local services</b> : Where access to essential facilities, including health, is assessed as poor, the effect would be Moderate to Major adverse effect.	Individual x1.
Sustainability Appraisal Objective 11	
Scoring should be changed to 'moderate adverse': Position in terms of local amenities, lack of safe pedestrian access, and infrequent local bus services mean that the assessment score should be 'moderate adverse'.	Individuals x7, Lea Garsdon and Cleverton Parish Council.
access to sustainable transport: The site does not have safe access to sustainable methods of transport and essential services, such as a GP surgery, and is not readily accessible by public transport. This is reinforced the Highways assessment of the site on page 169 of the Site Selection Report.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Road is unsafe for pedestrians: The assessment fails to consider that the access is on a main 50mph road which is unlit, that the site has no pedestrian access to the village, and that essential facilities are only available in major settlements 4km away without regular public transport services.	Individual x1.
Sustainability Appraisal Objective 12	
<b>No employment or education opportunities provided:</b> The site fails entirely to provide education and employment opportunities and it fails Wiltshire Council's own proposed Policy GT3 requiring access to primary school (and doctors/health centre). This allocation cannot have anything other than a major (significant) negative effect on the Gypsy/Traveller community who would be living on this site.	Individuals x2.
Suggested modifications	
Brownfield site: Suggest modification to build the development on a brownfield site.	Individuals x3.
Unsound: The site should be removed as it is unsound.	Individuals x14; Little Somerford Parish Council; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Location of sites:</b> Gypsy and Traveller sites should be allocated within large housing developments in Chippenham as done elsewhere for example in Hampshire and Berkshire.	Individuals x2.
Communication: Add a policy that respects the settled community requiring clear effective communication.	Individual x4.
<b>Mitigation measures:</b> Add a policy to review the extent of mitigation and engineering measures required, and assessment of development viability	individual x1.
Suitability of the site: Report on the assessment of the site to determine its suitability.	Individual x1.
Require suitable assessment of sites: Appraisal of potential development sites based on sound scientific, engineering and environmental assessments before any site is included in the Plan.	Individual x1.
<b>The Plan is not sound:</b> The site scores badly against the Sustainability Appraisal objectives, Objective 2 of the Plan and the national Planning Policy for Traveller Sites regarding its location. It has no services and is too close to existing residential housing. It should be removed as it is not a sound allocation.	Individual x1.
No connections to transport or key infrastructure: The proposals are on greenfield sites with no public transport links, they are not close to amenities and there is no mains sewage. There is a shortage of medical services in this area and they are out of keeping in this rural area.	Individual x1.
pact on residential amenity: Development would adversely impact residential amenity by developing a nquil site which is already disturbed by current unauthorised use.	Individual x1.
Impact on character: Development would harm character of Little Somerford and is inconsistent with Policy GT3 (iii).	Individual x4, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
<b>Drainage:</b> The site is on impermeable clay and surface and foul water drainage would not work and pose a risk to the site and the community around it. Development would be inconsistent with Policy GT3 (vi and viii).	Individual x1.
<b>Biodiversity:</b> The policy has been assessed as having a minor adverse impact as mitigation is likely to be difficult to achieve however the assessment makes unevidenced claims.	Individuals x2.
<b>Brownfield sites:</b> Wiltshire Council do not appear to have given adequate consideration to the use of brownfield land as required by the Sustainability Appraisal framework.	Individuals x2.
<b>Agricultural land</b> : Loss of agricultural land increases carbon emissions rather than taking steps to combat climate change.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
<b>Drainage:</b> Development of the site will reduce natural drainage features creating an adverse impact by increasing surface and ground water quantity into the drainage system which is unable to cope.	Individual x1.
<b>Sewerage system</b> : The site lacks access to a mains sewerage system and suitable access can only be achieved across adjacent privately owned property.	Individual x1.
<b>Noise and light pollution:</b> The impact from noise and light pollution will be adverse and cannot be mitigated.	Individual x1.
<b>Flood risk:</b> Any additional drainage to mitigate flooding on the site and any additional impermeable surfaces on the site will increase flood risk in properties downhill from the site in the adjoining village.	Individuals x2.
Landscape: Development of the site would substantially alter the landscape as would any planting or screening.	Individual x1.
Sustainable transport: The position of the site in relation to local amenities, infrequent local bus services and a lack of safe pedestrian access means there will not be access to sustainable modes of transport and it will not minimise the need to travel to essential services.	Individuals x2.
evidence of how the assessment was conducted: The Sustainability Appraisal only lists the outcome, with no quantifiable supporting evidence as to how the assessment was conducted and what assessment criteria was used.	Individual x1.
evidence of how the assessment was conducted: The assessment on the length of removal of hedgerows to provide a widened access can only be made by a suitably qualified body. No quantifiable evidence of assessment has been made.	Individual x1.
Rural settlement: Little Somerford has been described as an urban area when it is not an urban area but a rural settlement.	Individual x1.
Community facilities: Little Somerford does not contain community facilities.	Individual x1.

Table 5.39 Policy GT28 - Land at Oxhouse Farm, Rowde key issues

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Highways and Transport (including access)	
Unsafe access: Access and egress to the site close to a blind bend and opposite a junction.	Individuals x41.
<b>Highways safety:</b> Despite the 2.4m setback for the access, the probability of accidents occurring are deemed to be to excessive and there is also a bus stop in the proximity so adding another danger for humans and vehicles.	Individual x1.
<b>Highway safety:</b> Increase in traffic will be too great from 10 units on the site and bring highway safety issues including for pedestrians.	Individuals x5.
<b>Highway safety:</b> Highway safety assessment of the site was undertaken with no local knowledge. Site development would result in hazards for highway users turning right from Conscience Lane having to consider traffic from a new site entrance within 20m in addition to traffic from Rowde and Devizes with partial visibility.	Individual x1.
Visibility splay requirement is unachievable: 43m visibility requirement in the policy is unachievable.	Individuals x2.
Reduced Visibility: Bins outside the site could reduce visibility further.	Individuals x5.
Dedestrian infrastructure: There is no pedestrian infrastructure.	Individuals x25.
<b>Thsafe pedestrian crossing:</b> On-site residents would have to cross the A342 to access the footpath and then again to get into village or the school grounds.	Individuals x3
Site is not within walking distance of facilities: Site is not within walking distance of many facilities and services.	Individual x1.
Query: Where would the new field access be located?	Individual x1.
<b>Increased car usage:</b> No footway will increase car usage and increase in traffic on Devizes Road from 10 pitches.	Individuals x4.
Dangerous road: Vehicles travel at more than 30mph making walking increasingly dangerous.	Individuals x12.
Increased traffic congestion: Development would increase congestion on the A352 into Devizes.	Individual x1.
<b>Buses stopping at site will add to congestion:</b> Buses stopping outside the site would constitute additional issues accessing the site including queues.	Individuals x5.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Road is already dangerous: The A342 is notorious for traffic collisions.	Individuals x4.
<b>Will add hazards to vehicles turning from Conscience Lane:</b> Site development would result in hazards for highway users turning right from Conscience Lane having to consider traffic from a new site entrance within 20m in addition to traffic from Rowde and Devizes, with partial visibility.	Individuals x21; Your Village Your Say.
Traffic will conflict with agricultural traffic: Increase in traffic will conflict with existing agricultural traffic.	Individual x1.
Increase in car traffic: Lack of local facilities will result in more car traffic from this site going through the village.	Individuals x4.
<b>Single access point is fire risk:</b> The single access point is a fire risk, two are needed to allow for change in wind direction.	Individual x1.
<b>Prevents access to further farmland:</b> Position of the site will prevent access to another 13 acres of productive farmland.	Individual x1.
acerbating highway flooding: Development would exacerbate highway flooding.	Individual x7.
n-site and highway flooding: On-site flooding and flooding of the adjacent highway.	Individuals x15
Entrance would constantly flood: The entrance to the site would be constantly waterlogged and often woderwater during a flood event.	Individual x2; Your Village Your Say.
Utilities and Drainage	
<b>Nearby National Grid project:</b> There is a local National Grid project currently taking place under Roundway Hill, off Conscience Lane, to remove the overhead pylons and put them underground.	Rowde Parish Council; Individuals x6; Your Village Your Say.
<b>Incorrectly identified flood risk area:</b> The flood risk assessment is incorrect because Environment Agency maps show this site to be clearly in the high risk area for groundwater flooding and not just high surface water flood risk.	Individual x2.
Surface run off flood risk: Water run-off from site could flood houses on Devizes Road.	Individual x3.
Land retains water: The land retains water when it rains heavily. The water does not drain away.	Individual x29.
<b>Site partially within Flood Zone 3:</b> Parts of the site in the top left corner are in flood zone 3 based on flood map for planning.	Individual x1.
Field has high probability of flooding: The Rowde/Tanis area has a high probability of flooding.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
<b>Drainage stream down Dunkirk Hill can cause significant flooding:</b> Main drainage stream to the west of the site coming down from Dunkirk Hill can cause significant flooding together with on-site springs adjacent to the main A342.	Individuals x15.
<b>Flood risk:</b> The road floods on the bend where the proposed site access is as the field behind floods and overwhelms the drains and this would only get worse with any development on this site.	Individual x1.
<b>Flood risk</b> : The flood risk assessment for Oxhouse Farm is incorrect because Environment Agency maps show this site to be clearly in the high risk area for groundwater flooding and not just highly surface water flood risk.	Individual x1.
Climate change: Flood risk to increase given climate change.	Individual x8.
<b>Flooding:</b> A full water table survey is to be carried out to ensure all measures are carried out to prevent any future flooding in the site.	Individual x1.
<b>Flood risk:</b> Propose a modification that the Plan chooses lower grade land with less flood risk and traffic hazard for example in Devizes.	Individual x1.
Existing sewer capacity issues: There are problems with sewer capacity.	Individuals x12.
Dw pressure water mains: There are low pressure water mains.	Individual x1.
Access works will impact drainage: Access works including ditch filling and hedgerow relocation will affect drainage.	Individual x1.
<b>Drainage solution would require substantial investment:</b> Substantial investment would be required into surface water drainage.	Individual x1.
Site Design (including privacy)	
<b>Expansion of school site:</b> The site is located adjacent to a school which may need to expand in the future to accommodate more children.	Individual x1.
Potential expansion: The site could enlarge in the future.	Individuals x5; Your Village Your Say.
Family accommodation: No provision for families and teenagers.	Individual x1.
Large waste bins will be unsightly: Siting of large industrial bins at other traveller sites are quite unsightly.	Individuals x3.
Waste management: There will be a risk of poor waste management impacting on surrounding fields and surrounding neighbourhoods.	Individuals x3.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Settlement gap: The land forms an important buffer between Rowde and Devizes.	Individual x1.
Privacy: The site's proximity to housing would impact on resident's privacy.	Individuals x2.
Permissive path at site: There is a permissive path at the southern boundary of the field.	Individuals x5.
Dog walkers: The land is enjoyed by dog walkers.	Individuals x2.
Landscape	
<b>Brownfield sites would be preferable:</b> Council should have investigated derelict land or re-evaluate past planning permissions for existing sites to meet need, instead of allocating this site.	Individuals x2.
<b>Brownfield land around Devizes should have been considered:</b> Brownfield land around Devizes was not considered in the site selection exercise.	Individuals x2.
<b>Landscape impacts:</b> The site is tranquil, contrary to the assessment which states it is not remote or tranquil.	Individual x1.
wot in-keeping with rural community: The development would not be in keeping with the rural community of cowde.	Individual x1.
ss of agricultural land: Land is high grade agricultural land and should not be lost to development.	Individuals x27.
<b>Light pollution:</b> Development will cause light pollution. This would have a detrimental effect, also on the neighbouring national landscape/AONB.	Individuals x16; Your Village Your Say.
<b>Increased noise pollution:</b> Development would result in increase in noise pollution which will affect the other residents of Devizes Road and Tanis.	Individuals x4.
<b>Landscape impacts:</b> Site lies on the edge of the national landscape and would also harm the local landscape and its wider setting.	Individuals x15.
<b>Visibility of site and bund:</b> If a bund is included, this could be visible from MROM56 Oliver's Castle from the North Wessex Downs National Landscape.	Individuals x7.
Screening will be insufficient: Screening will not mitigate visual impact from Roundway Hill which is on elevated ground and overlooks the site.	Individuals x2.
Screening will not immediately succeed: Screening will take time to grow and may not succeed.	Individual x1.
River Quality and Biodiversity	

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Increased river pollution: Increased pollution into the Kennet & Avon Canal.	Individual x1.
<b>Field is often flooded and provides habitats for variety of species:</b> The field is often flooded from October to April most years, this 'winterbourne lake' is the habitat for species of frogs, toads, and newts and it is unclear that the WCC inspection of the site covered this period of the year.	Individuals x5.
Water voles: The brook along the east side hosts water voles.	Individuals x13.
<b>Impacts to existing habitats:</b> This is an area that may impact on other habitats which are protected by the Wildlife and Countryside Act 1981.	Individuals x7.
<b>Bat impact area:</b> The site falls within an impact area for bat species and the development would have a negative impact on bats.	Individuals x4.
<b>Development would disrupt onsite flora and fauna:</b> Site development, including hedgerow removal for access, would disrupt and impact on on-site fauna and flora.	Individuals x9.
Hedgerows: The hedgerows are predominantly of English Elm providing natural habitat and should not be disturbed	Individual x1.
Astoric Environment	
Alchaeology: The land is of archaeological interest. A full, thorough and accountable investigation for archaeological remains/relics and protected species before work is carried out.	Individuals x2; Your Village Your Say.
Scale	
<b>Too large for identified need:</b> A 10-pitch site is not small and this does not meet what travellers would prefer which is small sites with family owned pitches as per the Regulation 18 consultation report p.54.	Individuals x2.
<b>Impact on local area:</b> Development would dominate the local area on the corner of Devizes Road which consists of eight properties and is distinct from the next housing area.	Individuals x5.
Other	
Insufficient local facilities: There are not enough local amenities.	Individuals x7; Your Village Your Say.
School capacity: The school may not have room for more children.	Individuals x2.
<b>Must be used by genuine Gypsies and Travellers:</b> Sites must be allocated for genuine Gypsies and Travellers only.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Local knowledge not considered: Assessments did not consider local knowledge on issues with the site.	Individual x1.
<b>Site would be unsuitable for residential development:</b> Planning permission would not be granted for residential development here.	Your Village Your Say.
Impacts on the residential amenity: Concerns about site management and impacts on the residential amenity.	Individual x1.
<b>Sub-standard and potentially dangerous site:</b> It does not seem fair to offer a substandard and potentially dangerous site to Gypsies and Travellers.	Individual x1.
<b>Lack of consultation and engagement:</b> Overall lack of engagement with local communities and neighbouring authorities.	Rowde Parish Council.
Unclear how objectives will be met: Lack of clarity regarding how various policy objectives will be achieved.	Individual x1.
Remove site from plan: The site should be removed from the Plan before submission.	Individual x1.
Phpact on agricultural land: An accountable guarantee must be made to ensure that the site does not grow size so diminishing the retention of Greenland and further damage the near-unique agricultural area the exposed site occupies.	Individual x1.
<b>Sequential approach:</b> Propose a modification that the Plan includes a reference to using the sequential approach for flood risk and those with lower risk being developed in preference.	Individual x1.
Suitability of site: The site should be removed as it is unsuitable.	Individuals x3.
<b>Historical considerations:</b> There must be thorough investigations regarding the agricultural and historical benefits before any actions are taken.	Individual x1.
<b>Various issues:</b> Site has multiple issues including flood risk, highways and access, archaeology, no access to services and facilities, and effects on neighbouring residential uses in terms of noise and light pollution. Lack of engagement with local community as part of the planning process.	Your Village Your Say.
Sustainability Appraisal	
<b>Development on Grade 2 agricultural land:</b> Representor submits that the SA at Table 4 recommends to avoiding where possible, development of best and versatile agricultural land. The proposed allocation constitutes Grade 2 arable land.	Individuals x2.
Amend RAG status: Representor suggests correcting site assessment score for access and surface water 'red' rather than 'amber'.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
<b>Site selection process:</b> Representor submits that in the site selection process, sites ruled out at Stage 5 should be reconsidered during the Sequential Test at Stage 6.	Individual x1.
Weighting attributed to Stage 5 (Site selection process): Representor submits that Stage 5 reasons for excluding sites should not carry more weight than flooding.	Individual x1.
<b>Flood risk:</b> The Plan should state that sites at lower risk of flooding should be developed in preference to those at higher risk.	Individual x1.
Site assessment should be red for surface water and site access: The site assessment indicates 'amber' for the vehicle access and for the surface water however, visibility for traffic accessing the site is very poor. Surface water and site access should be marked as 'red' rather than 'amber' in the assessments.	Individual x1.
<b>Brownfield sites:</b> Aim to maximise brownfield sites and not to use greenfield sites that are in agricultural use. This site is a greenfield site and is currently in agricultural use with a tenant farmer and would result in the loss of Grade 1 land.	Rowde Parish Council.
Fipod risk: The A342 at the entrance to the proposed site, floods regularly when there is heavy rain. Rowde Primary School has been permitted to fill a ditch that ran along the back of the property (adjacent to the proposed exception of the proposed problems).	Rowde Parish Council.
Food risk: Policy is not sound as it is a flood risk, by nature of the proliferation of underground springs in the indicate vicinity and runoff from the field entrance, together with surface water running down the A342 from the direction of Dunkirk Hill (Flood Zone 1: risk of surface water flooding).	Individual x1.
<b>Ditches are overgrown:</b> Ditches are overgrown and Wiltshire Council does not enforce landowners to clear their ditches. This compounds problems with flooding. The ditch on the road to the proposed opening is higher than the road and work that was agreed to take place to dig out the ditch has never taken place.	Rowde Parish Council.
Geophysical survey has not taken place: No geophysical survey has been carried out.	Rowde Parish Council.
The removal of hedgerows will take many years before it provides visual mitigation: The proposed site has shared intervisibility with the North Wessex Down Natural Land. This is an Area of Outstanding Natural Beauty. The policy states that it may be necessary to move hedgerows for visibility, new planting will take many years before it provides visual mitigation which does not help with integration of the site the effect it will have on the dominant community.	Rowde Parish Council.
<b>Natural habitat:</b> The historic hedgerows enclosing the proposed site are predominantly of English Elm, which provides a natural habitat for wildlife around the village.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
<b>No health or community services:</b> Rowde has no health or community services. 'The site is selected to minimise need to travel to essential services' however there are no essential services in Rowde.	Rowde Parish Council.
<b>Insufficient evaluation:</b> Insufficient evaluation of this site has been conducted particularly in consideration of the overall land quality and irretrievable loss of agricultural land, consideration of the flooding risk to the intended residents, consideration of the local wildlife and the impact to highways in a potentially dangerous area.	
<b>Watercourse:</b> The watercourse provides drainage from the Grade 2 agricultural land below the Bath Road Escarpment and contains both diverse and rare aquatic life.	Individual x1.

Table 5.40 Policy GT29 - Land at Upper Seagry Farm, Upper Seagry key issues

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Highways and Transport (including access)	
<b>Public Services, Infrastructure and Employment:</b> Access to education, health, welfare and employment is reliant on private car ownership as the villages public bus service runs infrequently (twice a day) and Upper Seagry has limited/no infrastructure/services in the village. Residents will need to travel to Chippenham or Malmesbury to access services. This is against the Sustainability Appraisal objective of reducing the need to travel and it will isolate the occupants of the site.	Individuals x86; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
<b>Traffic Congestion:</b> Due to the lack of public transport and site location, occupants will require a car which will increase traffic in the village. Upper Seagry is already struggling with flooding, poor road conditions and road traffic.	Individuals x21, Cisco Systems.
Pedestrianisation: Access to local bus stop and village requires walking along the road which has no footpath, no street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents.   In a street lighting, is on a bend in the road and at national sp	Individuals x49; Trustees of Goss Croft Hall; Cisco Systems x2; FM Conway Ltd x2; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
Main Road Access: Immediate access to main roads would be preferable.	Individual x1.
Existing Road Use: Narrow lanes to and from site are used for heavy and large agricultural vehicles.	Individuals x10; Cisco Systems.
Visibility Splay: Limited sight line from the entrance on a national speed limit road, despite the proposed removal of hedgerow. This increases the risk of accidents.	Individuals x35; Trustees of Goss Croft Hall; FM Conway Ltd; Great Somerford Parish Council; Seagry Steering Group; Cisco Systems.
<b>Visibility Splay Legislation:</b> Highways England 'Design Manual for Roads and Bridges' requires a 215m visibility splay. From the south a 90m visibility splay is unsafe given the 60mph speed limit. Representors suggest a 215m policy compliant visibility splay should apply.	Seagry Steering Group; Cisco Systems.
Agricultural Vehicles: Site is close proximity to large agricultural vehicles which poses a safety risk.	Individuals x2; FM Conway Ltd.
<b>Visibility:</b> The representor states there is less than 100m visibility based on the Design Manual for Roads and Bridges guidance. Wiltshire Council does not own or maintain the hedgerow to the north along the road so the	SLR Consulting on behalf of Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
councils claim that appropriate visibility can be achieved is misguided. There are safety issues with regards to speed checks along the road. Achieving the desired visibility splay has safety implications in this regard. A large section of the hedging would need to be removed to ensure safe access to the road.	
Vehicular access: Access to site GT29 would be difficult and potentially dangerous.	Individual x1.
<b>Pedestrian safety:</b> To gain access to health and community services and facilities or shops occupiers will need to travel to Chippenham, Malmesbury, Great Somerford, Sutton Benger and Christian Malford. None of these locations are accessible by footpath or a lit road so represent a hazard if accessing by foot.	Individuals x15; FM Conway x3.
<b>Access to public transport:</b> The site has poor public transport accessibility with a very limited service in Upper Seagry.	Individuals x11; FM Conway x3.
<b>Accessibility:</b> To enable the required access and to accommodate visibility splays significant removal of the hedgerow would be inevitable making the site extremely visible.	Individuals x14; FM Conway x3.
Hillities and Drainage	
Sewer Connection: A foul sewer connection is likely to be disproportionately costly and disruptive given the stance the site is away from the main sewer. If Biotreatment is the only viable option, run-off will contaminate and environments.	Individuals x22; Trustees of Goss Croft Hall; Cisco Systems x2; Great Somerford Parish Council.
Requirement for Sewer Connection: Paragraph 4.1.35 is uncertain if a foul sewer connection is required. Representor asks on what grounds would it not be required?	Individual x1.
<b>Electricity and Water Connection:</b> Electricity and water mains are not on site, so it would be a significant cost to install this infrastructure.	Individuals x4; Great Somerford Parish Council.
<b>Renewable Energy:</b> Site is unlikely to have a positive effect regarding the generation of energy from renewable sources as there would be insufficient supply for cooking.	Individuals x3; Seagry Steering Group; Cisco Systems.
Waste Management: Insufficient and ineffective waste management facilities.	Individual x1.
<b>Sewage Back-up:</b> Sewage must have emergency overflows to cover for breakdown or power failure. These can only be routed to the above waterway.	Individual x1.
Drainage: GT29 sits on heavy clay. Concerns raised over drainage and how this will be remedied.	Individual x1.
<b>Low-carbon energy:</b> All should be using low-carbon energy generation to meet net-zero standards. In relation to GT29 this would be a costly exercise and not good use of tax payers money.	Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
<b>Flood risk:</b> Runoff/ Road Flooding is already an issue in Upper Seagry, particularly near to this field access and Upper Seagry Farm entrances.	Individuals x3; FM Conway.
<b>Drainage:</b> There is a lack of mains drainage that would result in pollution of 3 ancient field ponds situated on the natural topographical drainage course along the northern site perimeter.	Individuals x3.
<b>Sewerage treatment:</b> Sewerage treatment by onsite plant or by pumping offsite must have emergency overflows to cover for breakdown. These can only be routed to the waterway. Surface runoff must be similarly routed.	Individuals x5.
Sewerage Run-Off: Sewerage provision will cause polluted run off into the local environment and worsen biodiversity quality.	Individual x1.
<b>Soil Infiltration:</b> Pitches will compact the soil reducing its ability to adsorb water, resulting in increased runoff, erosion, loss of fertile topsoil. This will impact drainage patterns.	Individuals x5.
Flood Risk: The Plan acknowledges 'there is evidence of high groundwater', and there is a lack of drainage infrastructure which has caused flooding in the village and near the site.	Individuals x34; Trustees of Goss Croft Hall; Seagry House Estate; FM Conway Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group; Cisco Systems.
<b>Sainage:</b> The underpinning evidence in the Site Selection Report states that the site should be developed for more than five pitches.	Individual x1.
Site Design (including privacy)	
<b>Proximity to Seagry Village Hall:</b> Site is adjacent to the well-used Seagry Village Hall. Any hedge planted would take years to mature to provide privacy. The site will have a detrimental impact on village hall bookings which is used for events.	Individuals x31; Great Somerford Parish Council; Seagry Steering Group.
Impact on village hall: Concerns over potential impact of development on adjacent village hall.	Individual x1.
Landscape	
Hedgerow: Much of the hedgerow at GT29 would be lost.	Individual x1.
<b>Hedgerows:</b> The installation of the infrastructure required to support a new community together with the removal of existing hedgerows will drastically diminish the rural character of the village.	FM Conway.
Views: Site GT29 is adjacent to the village hall and affect views from the hall resulting in reduced bookings.	Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
River Quality and Biodiversity	
<b>Biodiverse Species:</b> There is potential presence of great crested newts and there are several other species of biodiversity not given any mention in the proposal. Species use the pond as a water source so would be prevented access by development of this site. There are insects, birds, deer and bats which will be impacted by the site placement.	Individuals x32; Trustees of Goss Croft Hall; Seagry House Estate; FM Conway Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group; Cisco Systems.
Renewable Energy: Renewable energy would conflict with biodiversity on the site.	Individuals x2.
Hedging: Important wildlife hedging will be lost to meet traffic viability requirements which will effect biodiversity.	Individuals x 29; FM Conway Ltd; Great Somerford Parish Council; Seagry Parish Council; Cisco Systems.
Biodiverse Plants: The construction of pitches will reduce plant biodiversity which impacts food chains and exposystems.	Individuals x5.
<b>Qak Tree:</b> Oak Tree subject to a Tree Preservation Order which will be affected by the site.	Individuals x5; Seagry Steering Group.
Pond Pollutants: Pollutants will impact three ancient field ponds on the northern site perimeter.	Individuals x3; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; Great Somerford Parish Council.
Habitat Buffers: The site may need to be increased in size to accommodate the 10m buffer to existing habitats.	Individual x1.
<b>Grassland Quality:</b> Grassland is assumed to be in moderate condition when on inspection it is in excellent condition.	Great Somerford Parish Council.
<b>Bat Disturbance:</b> It is a crime to disturb bats in their habitats. Wiltshire Council has failed to assess bat populations and will be criminally liable.	Individual x1.
<b>Environmental Surveys:</b> The council have not performed any environmental/ecological surveys for the development plan, and there is no mention of required mitigations and the costs of these mitigations.	Individuals x8; Seagry Steering Group.
<b>Neutral Environmental Impact:</b> The statement that the site is of neural impact is inconsistent with the plan. Adverse effects will arise from the removal of hedgerows, vehicular pollution (due to increased private car ownership), noise and light pollution.	Individual x24; Great Somerford Parish Council; Seagry Parish Council; Seagry Steering Group.
<b>Landscape Damage:</b> Development would be perceived as an alien feature in the natural landscape, requiring significant removal of hedgerow.	Individual x63; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; FM

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
	Conway Ltd x3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group.
Lack of assessments on biodiversity in the area: Treater Crested Newts may be present and the hedgerows provided a prime location for bats. Hedges such as those present adjacent to the site are ideal for bats as they are more valuable commuting routes and as a foraging habitat with lots of insects.	Duckworths Arboriculture Ltd on behalf of Individual x1.
<b>Protected wildlife:</b> The presence of protected wildlife such as great crested newts and bats would require protection of their environment.	Individuals x6; FM Conway.
<b>Habitat creation:</b> Habitat creation has not been explored or protected and species have not been identified to strive to enhance the fauna and flora of this established village.	Individuals x2.
Historic Environment	
Tevelopment on Agricultural and Historical Land: Disapproval for development on Grade 2 agricultural land the historical and cultural value (presence of a medieval ridge). Brownfield sites should be prioritised. Evelopment could cause irreversible damage.	Individual x78; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x3; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
<b>Historic environment:</b> There is clear evidence that the proposed site and the land around it have historic medieval ridge and furrow.	Individuals x15; FM Conway x2.
Other	
<b>Agricultural land:</b> Proposed site is on grade 2 very good agricultural land that has never been developed and is still being currently farmed.	Individuals x16; FM Conway x3.
<b>Impact on farming:</b> The site is on Grade 2 agricultural land and development impact the operation of the current farming use cattle. The tenant was not informed by Wiltshire Council. The existing access is needed by the farmer and a new access will be required for the development.	Individual x1.
<b>Sense of Community:</b> The site is a distance from the village so there would be no sense of being part of the village community.	Individuals x5; Verschoyle Graphic Design.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Dairy Farm Odour: Upper Seagry Farm has a Dairy herd that generates odours and attracts flies.	Individuals x4; Seagry Steering Group; Cisco Systems.
<b>Farming:</b> The site removes income from the farmer who currently uses the land for cattle (part of an SFI scheme for 3 years). The tenant was not informed by Wiltshire Council and was only told by the Parish Council.	Individuals x16; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group.
Core Policy 2 in the Neighbourhood Plan: Conflicts with Wiltshire Council's own policy SN6 Core Policy 2 in the Neighbourhood Plan that small village development will be limited to infill within the built area. Upper Seagry is defined as a small village so the development therefore breaches this policy.	Individuals x17, LPC Ltd on behalf of individual x1, Seagry Parish Council, Seagry Steering Group, Cisco Systems.
Government's 'Planning Policy for Traveller Sites' paragraph 26: Policy states that 'local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements'. Site is within walking distance of Upper Seagry which is a small village. Previously developments have been rejected due to the unsuitable location of Upper Seagry.	Individuals x29, Seagry House Estate, Cisco Systems x2, Great Somerford Parish Council, Seagry Parish Council, Seagry Steering Group.
<b>Spiective 3 of the Plan:</b> Unsuitability of site against Objective 3 'the site should be fitting with the surroundings, cated in a suitable location, access to services and facilities'.	Individuals x20; Cisco Systems x2; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group.
<b>Sites elsewhere:</b> There are many other Gypsy and Traveller sites nearby that have capacity. For instance, Seagry Hill has an unused traveller site and travellers have recently purchased land adjacent to the A350 leaving Chippenham toward the M4. Other sites owned by the council include Fairhaven, Thingley and Lode Hill.	Individuals x9, Seagry Parish Council, Cisco Systems.
Consultation process: Not notified of this site by Wiltshire Council.	Individuals x5.
Affordability: Representor has to travel to work due to a lack of affordable housing in the area.	Individual x 2.
Cost: Concerns over availability of resources to deliver this site.	Individual x1.
<b>Land ownership:</b> The Plan refers to a hedge on the northern boundary, that implies it is within the site when it is of ownership to OS field numbers 6923 and 8627.	Great Somerford Parish Council.
Site requirement: Residual requirement for new pitches is 68 not 81 due to new planning permissions.	Individuals x4; Seagry Parish Council; Seagry Steering Group; Cisco Systems.
Extending sites elsewhere: Extend already established Gypsy and Traveller sites.	Individuals x8; Great Somerford Parish Council; Seagry Parish Council.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
<b>Policy wording:</b> Inconsistencies in policy wording. Policies GT30, GT26 and GT24 all state 'no more than x gypsy traveller pitches' whereas GT29 states the site 'is allocated for the development of 5 gypsy and traveller pitches'. Limitation of 'no more than' should be added to policy wording.	Individual x2.
<b>GT29 General location:</b> Is in a rural location away from settlements and services and does not meet national guidance in that regard.	Individual x1.
<b>Employment:</b> The site has poor access to employment. Employment should be within 6km but Chippenham is 8.5km away.	Individual x1.
<b>Agricultural land classification:</b> Wiltshire Council have incorrectly classified the land as partly Grade 2 and partly Grade 3. The land is entirely Grade 2.	Individual x1.
Remove site GT29: Remove this site as a site allocation.	Individual x1.
Agricultural Land: Site GT29 is on Grade 2 agricultural land and should be used as such.	Individual x1.
Access to schools and employment opportunities: The site has extremely poor access to schools and employment opportunities and there are no local businesses with job opportunities within walking distance or the care can reasonably be accessed via public transport. The nearest secondary schools are also in Chippenham.	Individuals x9; FM Conway x2.
w-carbon energy standards: All new sites should be using low - carbon energy generation and air source at pumps as it is a planning requirement for all developments to meet net - zero standards. This should be considered a baseline.	Individual x1.
Sustainability Appraisal	
<b>Objective 3:</b> Objective 3 states that sites should be designed to fit in with their surroundings, be located in sustainable areas and provide access to services and facilities that meet the needs of both the settled and traveller communities. However, there is no clear documentation available that assesses this site's suitability against these criteria.	Individuals x2.
Sustainability Appraisal scoring: Scoring against the Sustainability Appraisal is too weak. Site represents a major adverse effect.	Individuals x 60; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; FM Conway Ltd x 3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
	Individuals x73; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x 3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group.

Table 5.41 Policy GT30 - Land at Whistley Road, Potterne key issues

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Highways and Transport (including Access)	
<b>Reliance on private car use:</b> Future residents would rely on the car to access services and facilities as there is no dedicated space for safe walking or cycling, and no street lighting.	Individuals x38; Petition x487.
Infrequent local bus services: The local bus service is infrequent and stops early.	Petition x487.
<b>Difficulty for construction vehicles to access site:</b> During the site development the road would have to be closed and large vehicles have to gain access along what is already a very compromised lane.	Individual x1.
Weight limit on road ignored by drivers: The 7.5 ton limit is ignored by lorries and coaches.	Individuals x3.
<b>Encourages 7.5 ton vehicles:</b> The development would cause and encourage use of vehicles in excess of 7.5 tonnes.	Petition x487.
Speeding along existing road: Vehicles drive at more than 30mph making it dangerous for other road users.	Individuals x11.
ind turn at Church Corner: At Church Corner, Potterne, there is a blind right hand turn, in a single file road passing the old school with risk of accidents.	Individuals x4.
<b>Garrow single-lane highway</b> : Whistley Road is a narrow single-lane highway and cars use driveways to pass each other.	Individuals x36; Petition x487.
<b>Lack of Traffic Survey:</b> A traffic survey would have assisted the Council understanding the issues and it appears the site was not visited as part of the assessment.	Individual x1.
Roadside properties damaged by traffic: Roadside property has been damaged by road traffic due to narrowness of the highway.	Individuals x2.
Existing heavy traffic and congestion: Whistley Road is suffering from heavy traffic and congestion.	Individuals x35; Petition x487.
Coaches: Coaches are using this road also.	Individuals x7.
History of serious road accidents along road: There have been serious accidents on this road.	Individuals x14; Petition x487.
Potential for road accidents: Potential risk of there being a road accident.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Section of Whistley Road is unsuitable for large vehicles and trailers: The section of Whistley Road between Five Lanes and the A360 is unsuitable for larger vehicles and large trailers, with recent evidence of blockages caused by unsuitable vehicles using this route, including larger touring caravans.	Individuals x6.
Narrow track road with limited visibility: Access to the site is on a narrow single track section with limited visibility either way and risk of collision with other road users.	Individuals x16.
Large area needed for vehicles turning into site: To enable safe access a large area would have to be designated for turning but vehicles would end up reversing onto the lane.	Individuals x2.
Road blocks: Emergency or refuse collection vehicles would block the road.	Individuals x5.
<b>Dangerous blind bend close to site access:</b> Access onto Whistley Road from the A360 is dangerous as it is on a blind bend.	Individuals x5; Potterne Residents (group).
Narrow width of turning area off dual carriageway: There is a very narrow width of the turning area off the 61 dual carriageway at Caen Hill.	Individuals x2.
Previous reinforcements to road: The road has been reinforced twice to prevent collapse.	Individuals x2.
Rat-run: Whistley Road is a rat run for people travelling from Chippenham to Salisbury.	Individuals x10.
Pedestrian amenities: There is no street lighting and no footpath.	Individual x1.
<b>Transport and traffic impacts not adequately assessed:</b> Assessment of this site in the Plan does not adequately assess transport and traffic impacts.	Individuals x2.
<b>Relocation of site footpath:</b> There is a footpath within the proposed site boundary which would require relocating. To get to the footpath on the other side of the road would then be extremely dangerous.	Individuals x3.
Footpath safety concerns: Concerns over safety on footpath.	Individuals x3.
<b>Modify Whistley Road to make one way system:</b> Propose modifications to a) make Whistley Road one-way for its entire length plus walkway and street lighting or b) two-lane plus walkway and street lighting from the site to A361 Caen Hill and one-way plus walkway and street lighting from the site to A360 Potterne.	Individual x1.
<b>Wall removal:</b> The removal of the wall will result in further scope for traffic to erode the road edges and result in highway safety issues.	Individual x1.
Narrow road: The road is too narrow.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Limited access to facilities and services: Access is limited to nearby facilities and services.	Individuals x2.
<b>No streetlighting or footpaths:</b> There is no street lighting or footpaths on the road resulting in reliance on the private car and increasing traffic on unsafe road.	Individuals x2.
<b>Traffic:</b> Existing traffic issues at the site. This presents safety risks for walkers as there are no pavements.	Individuals x4.
Site is not easily accessible: The site is not easily accessible from Potterne.	Individual x1.
<b>Access road is unsuitable:</b> Whistley Road is single track. It is not a suitable site for accommodation of any type. Whistley Road is prone to flooding. The site is several miles from the nearest school or GP and would not be possible to access without private vehicles.	Individual x1.
<b>Reliance on private car:</b> Future residents would rely on the car to access services and facilities as there is no dedicated space for safe walking or cycling.	Individual x1.
Highway safety: Whistley Road is a narrow single-lane highway and cars use driveways to pass each other.	Individual x1.
Taffic: Whistley Road is suffering from heavy traffic and congestion.	Individual x1.
Ccidents: There have been serious accidents on this road.	Individual x1.
Bilities and Drainage	
<b>Exacerbating flood risk:</b> The fields on and around the site are prone to flooding which also affects the road. This would be made worse by developing the land.	Individuals x25; Petition x487.
<b>Poor existing site drainage:</b> The ground on the site is badly drained, torrential rain causes rapid flow of water across the site and flooding down the road.	Individuals x2.
<b>Geohazard:</b> Council's own evidence states that there is significant potential for geohazard. Ground instability problems are probably present. Increased infiltration may result in ground instability. This would be exacerbated by development.	Individuals x4.
<b>Surface water run-off increase:</b> Development would increase water run off towards properties and the frequency and severity of flooding.	Individuals x2; Petition x487.
<b>Drainage from sites contributes to flooding:</b> On site drainage was never improved and contributes to flooding issues in the locality.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
New hardstanding will increase flood risk: Site access and development would require hard driveways increasing water run-off and widespread flooding.	Individuals x4.
Wiltshire Council may be liable to increasing flood risk: Such events may give rise to a liability to Wiltshire Council for causing this foreseeable increased risk of flooding (Bybrook Barn Garden Centre and Others v Kent County Council CA 1 December 2001).	Individuals x2.
Utilities: Putting utilities into the site would be costly and could be done more cheaply at a site elsewhere.	Individual x1.
Utilities should be provided to all sites, there is an existing fault line parallel to Whistley Rd: Sites should be provided with access to mains water, electricity supply, drainage and sanitation in accordance with regulations. There is a fault line which runs parallel to Whistley Road which is one of the reasons land on the East side of the road has not been developed because there is a problem with water/springs on this line. Proposed site must be relatively flat and site should not be developed on exposed sloping because of the risk of flooding or over-turning of caravans.	Individuals x4.
<b>School Consultation Zone:</b> The proposed allocation 'Policy GT30 Land at Whistley Road' is within the Odour possultation Zone of our existing Potterne Wastewater Recycling Centre. Our Preliminary Odour Risk Assessment indicates that there is a Slight Adverse to Medium Adverse Effect. We recommend that the developer undertakes subtrary value emission rate odour model to predict the likelihood of future residents experiencing poor amenity. This should be backed up with a sniff testing assessment as the proposed allocation will result in a new sensitive receptor being placed in closer proximity to the Wastewater Recycling Centre than existing sensitive receptors.	Wessex Water.
Further sewage pipes will increase flooding: The area floods and adding further sewage pipes would risk further flooding.	Individuals x2.
<b>Fault line:</b> There is a fault line parallel to Whistley Road which one of the reasons land on the east side of the road has not been developed because there is a problem with water/springs on this line. Proposed site must be relatively flat and site should not be developed on exposed slopping sites because of the risk of flooding or over-turning of caravans.	Individual x1.
Waterlogged site: The land becomes very waterlogged and a risk to caravans stationed there.	Individuals x2.
Flooding: Existing flooding concerns at the site.	Individuals x3.
<b>Flood risk:</b> The field near the site is prone to flooding which also affects the road. This would be made worse by developing the land.	Individual x1.
Site Design (including Privacy)	

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Consultation potentially required:</b> Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Individual x1.
<b>Site is more suitable for single dwelling:</b> Site is far more suitable for a single dwelling than two Gypsy and Traveller pitches given the Government's drive for more housing and the pressure to build more housing in the village.	Individual x1.
<b>Site unsuitable for single dwelling:</b> The site was deemed unsuitable for the development of a single dwelling by both Wiltshire Council and the Planning Inspectorate and site conditions have remained the same since this decision.	Individuals x8.
Hedgerow removal: Development would require removal of significant section of hedgerow.	Individuals x9.
Historic hedgerow: Hedgerow is protected and at least 200 years old based on historic maps, so it cannot simply be replanted on a new alignment.	Individuals x3.
Redgerow removal: Development would require removal of 80 year old hedge.	Individual x1.
<b>Ste cannot be effectively screened:</b> Site cannot be effectively screened for many years through new planting, it is raised and the existing hedgerow and wall would have to be removed for access.	Individuals x2.
<b>Difficult to mitigate residential amenity impacts</b> : The land overlooks the road and neighbouring properties which makes is difficult to mitigate impacts on residential amenity.	Individuals x2.
<b>Impacts will increase parallel to site increase:</b> Site will grow with time with corresponding increase of impacts on the landscape, traffic, noise, light pollution.	Individuals x2.
<b>Unacceptable impacts to residential amenity:</b> Site development with pitches including dayrooms would be bigger than the refused single dwelling, dominate the nearest settled community and unacceptably impact on the amenity of neighbouring properties.	Individual x1.
Site doesn't comply with design requirements: The site does not comply with design requirements for gypsy and traveller sites as per 2008 Designing Gypsy & Travellers Sites – A Good Practice Guide.	Individual x1.
<b>Does not meet Good Practice Deign Guide principles:</b> Site does not meet design requirements in Designing Gypsy and Traveller Sites - A Good Practice Guide.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Fire and Rescue officer need to be consulted with:</b> Not clear if the fire and rescue officer was consulted in relation to the design and access requirements in accordance with 'Designing Gypsy and Traveller Sites - A Good Practice Guide'.	Individual x1.
<b>Further separation needed between site and houses:</b> Further separation is needed between good sites for travellers and established dwellings close to a conservation area.	Individual x1.
Landscape	
<b>Density of site allocations within local area:</b> Potterne and Rowde are within 5 miles of each other and are being targeted for just under 10% of new gypsy/ travellers sites in the whole of Wiltshire.	Individual x1
Too close to village: Concerns over proximity of development on the character of the village.	Individual x1.
Site is of rural character: The site is evidently rural in character and affinity with the surrounding countryside the development would be inappropriate as per appeal decision.	Petition x487.
<b>Palisbury Plain SPA Buffer Zone:</b> The site is within 6.4km buffer of Salisbury Plain SPA and a greenfield site equestion if impacts can be mitigated.	Petition x487.
Monitoring light pollution: Light pollution from the development cannot be policed.	Individuals x3.
<b>Unacceptable landscape harm:</b> Development would result in unacceptable harm to the landscape character of Whistley Road and the setting of the village, through the introduction of built form, caravans, and other paraphernalia; and to the character and appearance of the area as per the appeal decision at this site.	Individuals x16, Petition x487.
<b>Cumulative irreversible impacts:</b> In conjunction with other ongoing proposals including two major solar farms, the village would be overdeveloped and irrevocably changed.	Individual x1.
<b>Disruption to village character:</b> Potterne is a small village and influx of travellers would disrupt the character of the village, alienating many older residents in Potterne.	Individual x1.
Contrary to Wiltshire Core Strategy: The site is contrary to Policies 51 and 57 of the Wiltshire Core Strategy which requires development to protect, conserve and enhance landscape character and the landscape setting of settlements, and to enhance local distinctiveness by responding to the value of the natural environment, relating positively to its landscape setting.	Individuals x3.
Loss of farm: The loss of farm land cannot be compensated.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Unclear how agricultural use can continue</b> : If the site is developed it is unclear how farming could continue as the development would occupy the agricultural access.	Individuals x3.
<b>High Agricultural Value:</b> The land is of high agricultural value with fertile soil and should not be developed for this reason.	Individual x1; Petition x487.
River Quality and Biodiversity Quality	
Damaging impacts: The effects this site would have on important wildlife is both irresponsible and damaging.	Individuals x9.
Land is of ecological importance: The land is of ecological importance in the rural setting, with an ancient and well-established hedge and old wall along the full boundary length of the road.	Individual x1.
Historic Environment	
<b>Archaeological potential of site has been dismissed without investigation</b> : The potential for archaeological finds has been dismissed without investigation despite previous discoveries in the area.	Individual x1.
crease in traffic would contravene the Conservation Area: Increase in traffic from the site will be in intravention of the Potterne Conservation Area Statement 2002 which identifies traffic as a key issue. It states at efforts will need to be made to protect the special character of the village to ensure its long term survival the benefit of existing and future residents, businesses and visitors.	Individual x1.
mpacts to local character from removing wall: To maintain required visibility the wall may have to be demolished which currently adds to the local character of the village.	Individuals x4.
Other	
<b>Consultation period was too short:</b> Representor submits that the consultation period is too short and should have adhered to Government advice in the Gunning principles. i.e. 12 weeks.	Individuals x3.
Objection: General objection to the allocation - petition.	Individuals x22; Petition x497.
Contrary to Objective 3 of Plan: Allocation is contradictory to Objective 3 of the Plan.	Individuals x2.
<b>Does not meet Plan Objective 3 nor national planning policy requirements:</b> Site does not meet plan Objective 3 not national planning policy requirements as it is neither in the right location, on a treacherous and over stretched road, nor is it a sustainable site.	Individual x1.
Impact of development: Concerns over impact of development in Potterne.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Procedural impropriety:</b> The Plan also appears to meet the threshold of procedural impropriety in the numerous examples detailed above where Wiltshire Council has failed to adhere to the National Guidance, stated incorrect assessments based on flawed evidence and failed to submit evidence to support its subjective decisions. In conclusion, the Plan is not legally compliant and fails to meet the test of Soundness - it is not justified, effective, nor consistent with national policy.	Individuals x3.
<b>References to appeal decision:</b> In view of the appeal decision, the decision to propose this new site (Policy GT30) appears to meet the threshold of irrationality in a number of areas stated above, as per the Wednesbury Principles of Unreasonableness [Associated Provincial Picture Houses Ltd v Wednesbury Corporation (1948)].	Individuals x2.
<b>Contrary to the Core Strategy:</b> The site is contrary to Core Policy 47 of the Wiltshire Core Strategy, which states that state new pitches will only be granted where there is no conflict with other planning policies and where no barrier to development exists.	Individual x1.
Already suitable accommodation elsewhere: Suitable accommodation for these two proposed new pitches already exists on a Wiltshire Council owned site, therefore making Policy GT30 as a proposed new permanent effect redundant (Wiltshire Council Strategic Planning Committee Meeting, 10th July 2024 refers).	
Gontrary to appeal decision (refusal of Bungalow): The site would include the potential for six cars, two writing caravans plus two towing vehicles and touring caravans, which is above what was deemed unacceptable by the appeal decision regarding one bungalow.	Individuals x3; Potterne Residents (group).
<b>Not compliant with Local Plan:</b> Site is not compliant with the local plan as the area is not defined for development.	Individual x1.
Further development in the future: It would open up many other opportunities for development.	Individual x1.
<b>Development will lead to new undesirable housing development:</b> Development at this site would pave the way for undesirable future housing development on fields around Potterne.	Individuals x2.
Village does not meet Plan criteria: Potterne is a small village that does not meet the criteria set out in the Plan.	Individual x1.
Outside settlement limits: The site is located outside the settlement boundary and an appeal against refusal of planning permission for a single dwelling was dismissed.	Individuals x49; Petition x487.
Lack of facilities and amenities in village: There are not enough essential facilities and amenities in the village.	Individuals x30; Petition x487.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Medical facilities are over 3 miles away from village:</b> Local services such as doctor's surgery and chemists are over 3 miles away from the village and site.	Individuals x9; Petition x487.
<b>Lack of key facilities</b> : Lack of amenities, no doctor's surgery, no school and only a small shop. The bus service is light and would require complete reliance on cars, ease of access to such facilities from this site is unsuitable.	Individual x1.
Noise pollution: Noise pollution is a concern for residents, given the open nature of the fields.	Individuals x6.
<b>Visible light pollution:</b> Light pollution would also be visible from other properties in Whistley Road, together with properties as far away as Brownleaze Lane and Tollbar Close, which overlook the valley and Whistley Road.	Individuals x2.
<b>Irreversible impacts to residents:</b> The effects this site would have on residents is both irresponsible and damaging.	Individuals x3.
<b>Several impacted properties:</b> A larger number of properties (48) than stated in the evidence (25) would be affected by the site including Toll Bar Lane.	Individuals x2.
Sontrary to Wiltshire Core Strategy: Allocation is contrary to Core Policy 47(v) of the Wiltshire Core Strategy, and national Planning Policy for Traveller Sites paragraphs 4(k) and 13 in terms of accessibility of services, employment and facilities.	Petition x487.
Neighbourhood Plan and permitting it would ignore the plan.	Individual x17.
Site was previously excluded as housing allocation: The site was ruled out for housing allocation as part of the work on the Potterne Neighbourhood Plan.	Petition x487.
Parts of site will be isolated: Other parts of the land have been shut off resulting in complete isolation of the 'top field'.	Individual x1.
Remove site: The site should be removed from the Plan by way of a modification.	Individuals x6; Petition x487.
<b>Neighbourhood Plan:</b> Proposes modification to require the Potterne Neighbourhood Plan to assess if it is acceptable to extend the settlement boundary to include proposed site GT30.	Individual x1.
Location of site: The location of sites should be aligned with local village plans.	Individual x1.
Soundness: Site should be removed before submission to meet the soundness criteria.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Previous Planning Applications rejected at the site:</b> The site has already been deemed unacceptable for 1 single dwelling by both Wiltshire Council and the Planning Inspectorate. Traffic and Flooding are already issues at this Site. Loss of hedgerow is not an eco-friendly approach.	Individuals x4.
Location: The site is located away from essential facilities such as schools, employment or doctors' surgeries.	Individuals x2.
<b>Suitability of site:</b> Sites included in the Plan, must be suitable, fit for purpose, take into consideration and provide for the criteria set out in the Pre-submission draft plan (Regulation 19) when assigning sites. This justification has not been included for all sites, namely Policy GT30 as there was no other property to consider.	Individual x1.
<b>Appeal decision:</b> The site is located outside the village boundary and an appeal against refusal of planning permission for a single dwelling was dismissed.	Individual x1.
Sustainability Appraisal	
Site should be left in natural state for biodiversity purposes: In response to Sustainability Appraisal Objective to the site should be left in natural state to maintain biodiversity which can exist in combination with farming. Proposed development would encroach on endangered and protected species such as badgers, grass snakes, slow worms and bats.	Individuals x2.
And should be preserved for food production: In response to Sustainability Appraisal Objective 2 that in view of food shortages the land should be preserved for food production as it is decent agricultural land. Development would have more than minor adverse effect.	Individuals x2.
<b>No existing water or sewage connections:</b> In response to SA Objective 3 that there is no existing water or sewage connections on the site and development would reduce water drainage capacity of the land which means this is an adverse sustainability effect.	Individuals x2.
<b>Adverse environmental impacts (pollution):</b> In response to Sustainability Appraisal Objective 4, there will be adverse environmental effects from human habitation on this site in terms of vehicle movements, noise, light and air pollution which isn't the case at the moment.	Individuals x2.
<b>Development will increase flood risk on road:</b> In response to Sustainability Appraisal Objective 5, the low lying nature of Whistley Road means that water is directed through this road which is well known to agencies, water/sewage operator and the Council. Development on the site will cause more flooding onto the road and potentially neighbouring properties. The Council would ignore its responsibilities under the Flood & Water Management Act 2010 and make it worse.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<b>Upgrades needed to road drainage system:</b> In response to Sustainability Appraisal Objective 5, the road's drainage system would need upgrading.	Individual x1.
<b>Need assurances of sustainable construction practices:</b> In response to Sustainability Appraisal Objective 6, there would need to be assurances that sustainable construction and low carbon energy could be realised to support for a positive or neutral assessment score.	Individual x1.
<b>Archaeological significance:</b> In Response to Sustainability Appraisal Objective 7, there are many sites of archaeological significance around Potterne some of which are very close to the site and that unless archaeological investigations are carries out it cannot be certain that there will be no adverse sustainability effects.	Individual x1.
Amend wording from 'minor' to 'major' adverse effect: In response to Sustainability Appraisal Objective 8, the adverse effect should be major not minor because numerous buildings would be proposed; an old brick wall and hedge which are in character with its surroundings would be demolished for access; the views across the landscape when entering or leaving the village would be obscured by development; and the proposal would dwarf neighbouring properties.	Individuals x2.
the lack of public transport: In response to Sustainability Appraisal Objective 11, the neutral score is wrong due the lack of public transport; the road is narrow, congested and dangerous; lack of pedestrian infrastructure; and poor visibility at the point of access.	Individuals x2.
Amendment to SA (Primary school has now closed): Representor submits in response to Sustainability Appraisal Objective 12, the assessment is wrong because Potterne primary school has been closed for many years and the road is unsuitable for children and parents to walk to the nearest bus stop. Employment prospects in the local town could be accessed by car only.	Individuals x4.

Table 5.42 Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham Key Issues

Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
Highways and Transport (including access)	
<b>Site access:</b> Access to A3102 is not accessible. Entrance is via narrow country lanes which have speed bumps, awkward turns, vegetation overgrowth and are often flooded. This goes against Policy GT5 (i) 'Be located near, and accessible, to key travelling routes, making the site unsuitable.	Cllr Allison Bucknell.
Accessibility: The site is not easily accessed from the main routes, access is only via country lanes.	Cllr Allison Bucknell.
<b>Access to public transport:</b> Lack of services, public transport and pedestrian access for occupiers of the site. Residents will be reliant on private vehicles.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.
<b>Pedestrian travel and safety concerns:</b> Site proposes safety risks. Site is located on a 60mph road and there is no pavement or street lighting.	Thickthorn and Preston Neighbourhood Group x56; Individual x1, Cllr Allison Bucknell.
destrianisation: Site proposes safety risks to both settled residents and the travelling community. Site is cated on a 60mph road and there is no pavement or street lighting.	Thickthorn & Preston Neighbourhood Group x56.
Hilities and Drainage	
Phod risk: Increase of flood risk in the immediate surrounding area, due to evidence of medium/ high groundwater risk on site. This will have multiple impacts. The installation of hard standing will also cause challenges for site drainage.	Thickthorn and Preston Neighbourhood Group x56, Individual x1, Cllr Allison Bucknell.
Ground conditions: Wet ground conditions of the site itself making it unsuitable for residents.	Thickthorn and Preston Neighbourhood Group x56.
<b>Surface and groundwater quality:</b> Pitches on this site will adversely affect surface, ground and drinking water quality/quantity due to information presented above.	Cllr Allison Bucknell.
Drainage infrastructure: Additional residents will put pressure on drainage infrastructure and watercourses.	Thickthorn and Preston Neighbourhood Group x56.
Access to utilities: No accesses to water, sewerage, electricity or gas. There is no electricity supply running past the site and nearest mains sewer is over 2km away, the provision of this infrastructure will be expensive.	Thickthorn & Preston Neighbourhood Group x56, Individual x1, Cllr Allison Bucknell.
Site Design (including privacy)	

Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
<b>Impact on residential amenity:</b> Concerns over potential increased levels of noise, air and light pollution resulting from development on nearby residential amenity due to their close proximity.	Thickthorn and Preston Neighbourhood Group x56, Individual x3.
Landscape	
Landscape Impacts: Development would significantly impact the existing landscape.	Individual x1.
Adverse impact on the character of the area: The sites basic facilities will not be temporary which will change the character of the rural area.	Thickthorn & Preston Neighbourhood Group x56, Cllr Allison Bucknell.
River Quality and Biodiversity	
<b>Biodiversity Net Gain:</b> Sustainability Appraisal Objective 1.1 sets out that it may not be possible to deliver Biodiversity Net Gain on the site. The proposal will result in adverse impacts on the biodiversity of the existing agricultural field.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.
Other	
Folicy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.
ss of agricultural land: Loss of the best and most versatile grade 2 agricultural land.	Thickthorn and Preston Neighbourhood Group x56.
<b>Example 1 Example 2</b> Site allocation will block access to 26.77 acres of agricultural land for the tenant. This will subsequently impact their farming business.	Thickthorn and Preston Neighbourhood Group x56.
<b>Informing tenants:</b> Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm.	Thickthorn and Preston Neighbourhood Group x56.
<b>Does not meet policy criteria:</b> The site does not meet the criteria for new Gypsy and Traveller sites set out in Policy GT3 (iii).	Individual x1.
Brownfield sites: Not all brownfield options have been included in the site assessments.	Individual x1.
Lack of need: There is no current need for Gypsy and Traveller Sites.	Individual x1.
<b>Access to amenities:</b> The site has poor access to nearby essential facilities such as schools, GP's and other essential services which are already strained.	Individuals x2.
<b>Farming:</b> Site allocation will block access to 26.77 acres of agricultural land for the tenant. This will subsequently impact their farming business.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.

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Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
<b>Informing tenants:</b> Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm.	Thickthorn and Preston Neighbourhood Group x56.
<b>Population increase:</b> The site would double the number of people in the area, people who will not be part of the community, just passing through.	Cllr Allison Bucknell.
Sustainability Appraisal	
<b>Agricultural land:</b> The land is classified as Grade 2 very good agricultural land. Part of the farm would become inaccessible impacting on the business of the farm and causing a significant loss of agricultural land.	Cllr Allison Bucknell.
<b>Sewerage system:</b> There is no mains sewerage and acknowledgement that this is a medium/ high groundwater risk site leads to challenges with installing an off - mains sewerage system.	Cllr Allison Bucknell.
Climate change: Any development on the site is unlikely to reduce our vulnerability to future climate change effects with evidence showing that the "low risk of surface water flooding" is not the case.	Cllr Allison Bucknell.

# **Gypsies and Travellers Development Plan Document Section 5: Monitoring and Implementation**

- 5.25 Please see below the key issues table listing the key issues raised for the part of the plan within section 5: Monitoring and Implementation namely:
  - Monitoring and Implementation

### Table 5.43 Monitoring and Implementation key issues

Key issues raised (Monitoring and Implementation)	Respondent(s)
Site specific comments	
Comments received for Land at Thickthorn Farm, Preston Lane, Lyneham (See Policy GT31).	Individual x1.
Comments received for Emergency Stopping Sites (See Policy GT5).	Individual x1.

# **Gypsies and Travellers Development Plan Document Sustainability Appraisal**

- 5.26 Please see below the key issues table listing the key issues raised for the part of the plan within section 6: Sustainability Appraisal namely:
  - Sustainability Appraisal

Table 5.44 Sustainability Appraisal Key Issues

Key issues raised (Sustainability Appraisal)	Respondent(s)
Comments of support	
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.
Comments of objection	
<b>Plan is not sound:</b> The Plan is not sound and scores poorly against Sustainability Appraisal objectives, Objective 2 of the Plan and national guidance regarding the location of such sites.	Individuals x8.
Sustainability of the plan: The sustainability of this Plan is unsatisfactory.	Individual x1.
<b>Plan is not sound:</b> The Plan is not sound with regard to many key factors like education, health, transport, drainage, environment and social aspects.	Individual x1.
open countryside development: Local planning authorities should very strictly limit new development open countryside that is away from existing settlements or outside areas allocated in the development plan. They should ensure that sites in rural areas respect the scale of and do not dominate the nearest settled semmunity and avoid placing an undue pressure on the local infrastructure.	Individual x1.
mey should ensure that sites in rural areas respect the scale of and do not dominate the nearest settled	



This document was published by Wiltshire Council



# Wiltshire Gypsies and Travellers Development Plan Document Duty to Cooperate Statement

**Updated January 2025** 

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## 1. Introduction

- 1.1. The 'Duty to Cooperate' (DtC) is a statutory duty for Local Planning Authorities and is a requirement of the Localism Act 2011. Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) places a legal duty on Local Planning Authorities and other prescribed bodies to cooperate on strategic matters and cross-boundary issues when preparing development plan documents.
- 1.2. The Levelling Up and Regeneration Act 2023 received Royal Assent on 26 October 2023. Schedule 7 includes a provision that will make changes to the plan-making process in England, including the repeal of the DtC. It proposes to replace this legal requirement with a soundness test of 'alignment'. However, this Schedule is not yet enacted and will need secondary legislation. This statement covers both cases, as a legal test and a soundness test. The National Planning Policy Framework (NPPF) provides further guidance on the DtC. The NPPF was revised on the 12th December 2024, and retains the DtC.
- 1.3. This statement sets out the process and actions that Wiltshire Council ('the Council') has undertaken to meet the legal and policy requirements of the DtC. The statement identifies how and when the Council has complied with the DtC by engaging with prescribed bodies and neighbouring authorities throughout the preparation of the draft Wiltshire Gypsies and Travellers Development Plan Document (DPD), hereafter referred to as "the draft Plan". Cooperation with those bodies will continue through to examination and beyond. This statement is an update to a previous version published in August 2024.
- 1.4. This DtC Statement accompanies the submission of the draft Plan to the Secretary of State for independent examination in public. The Council considers that this statement demonstrates that the DtC requirements, as set out in the Localism Act 2011 and described in the National Planning Policy Framework (NPPF), have been fulfilled and that the Council has engaged with the relevant stakeholders constructively, actively and on an ongoing basis during the preparation of the draft Plan.
- 1.5. The Council has also prepared a separate Consultation Statement for the Regulation 18 and Regulation 19 stages of the plan-making process. The Consultation Statement details how the Council has undertaken public consultation during the plan-making process and how consultation responses have been used to inform the preparation of the draft Plan.

# 2. National Planning Policy Context

#### Localism Act 2011

2.1. Section 110 of the Localism Act<sup>1</sup>, 'Duty to co-operate in relation to planning of sustainable development' outlines additional requirements to Section 33A of the

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<sup>&</sup>lt;sup>1</sup> Localism Act 2011

Planning and Compulsory Purchase Act (2004). It outlines that Wiltshire Council, in the preparation of development plan documents, must cooperate with:

- Neighbouring local planning authorities.
- Other local planning authorities where sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
- Prescribed bodies as defined in Part 2 of the Town and County Planning (Local Planning) (England) Regulations 2012<sup>2</sup>. The bodies considered relevant for the preparation of the draft Plan include:
  - Environment Agency
  - Historic England
  - National Highways
  - Natural England
  - Homes England
  - o NHS England / Integrated Care Board
- 2.2. Wiltshire Council actively engages with the Swindon and Wiltshire Business and Growth Unit (SWBGU) (formerly the Swindon and Wiltshire Local Enterprise Partnership) regarding strategic matters in emerging development plans and where the delivery of key infrastructure projects, that require funding to assist in their deliverability, involves the SWBGU. The SWBGU is a shared function of Wiltshire Council and Swindon Borough Council, a local authority led partnership promoting cross boundary economic growth and regeneration in the region.
- 2.3. The Council is also required to co-operate with the Local Nature Partnership and work collaboratively to deliver a strategic approach to encourage the delivery of meaningful biodiversity net gain in accord with the provisions of the Environment Act 2021<sup>3</sup>. However, within Wiltshire there is currently no established partnership, although work is progressing on developing a Local Nature Recovery Strategy with key partners including Natural England, Swindon Borough Council and New Forest National Park Authority.
- 2.4. Overall, the Localism Act requires that the Council, neighbouring local planning authorities and prescribed bodies engage constructively and on an ongoing basis in relation to strategic priorities and matters.

#### **National Planning Policy Framework (NPPF)**

2.5. The December 2023 version of the NPPF<sup>4</sup> set out in paragraphs 24 to 27 that local planning authorities and county councils (in two-tier areas) are under a DtC with each other, and prescribed bodies on strategic matters that cross administrative boundaries. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. The NPPF was reviewed in

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<sup>&</sup>lt;sup>2</sup> Town and Country Planning (Local Planning) (England) Regulations 2012: Part 2

<sup>&</sup>lt;sup>3</sup> The Environment Act 2021

<sup>&</sup>lt;sup>4</sup> National Planning Policy Framework (December 2023)

December 2024<sup>5</sup>. It retains and strengthens the DtC requirement stating 'Local planning authorities and county councils (in two-tier areas) continue to be under a DtC with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries' (paragraph 24).

- 2.6. The Council is also obliged to engage with the local communities and other relevant bodies through the course of the plan-making process.
- 2.7. 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. Joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.8. To demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These will be produced where necessary as the draft Plan progresses, will be produced using the approach set out in national planning guidance, and be made publicly available through the plan-making process to provide transparency.

#### **Planning Practice Guidance**

- 2.9. Planning Practice Guidance<sup>6</sup> (PPG) outlines that local planning authorities are required to produce one or more statement(s) of common ground to report on how the authority has dispensed with their DtC. The PPG sets out what a statement of common ground is and what it is expected to contain.
- 2.10. A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is taking place throughout the planmaking process, by setting out the matters of agreement or disagreement between the parties concerned. The statement of common ground is a way of demonstrating at examination that plans are deliverable over the plan period and are based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate compliance with the DtC.
- 2.11. Where necessary, the Council will produce statements of common ground outlining where cooperation with prescribed bodies and neighbouring planning authorities, over strategic matters, has been undertaken and how matters of agreement and/or disagreement are to be addressed to ensure the delivery of the Plan.

# 3. Strategic Context

#### Wiltshire

<sup>&</sup>lt;sup>5</sup> National Planning Policy Framework (December 2024)

<sup>&</sup>lt;sup>6</sup> Planning Practice Guidance – Plan-Making

- 3.1. Wiltshire is one of the largest unitary authorities in England. The authority's area covers approximately 1,257 square miles and has a population of approximately 510,400 people. Wiltshire adjoins the higher tier local authorities of Dorset, Somerset, South Gloucestershire, Oxfordshire, West Berkshire, Hampshire, Swindon and Bath & North East Somerset.
- 3.2. Wiltshire is a largely rural area encompassing many natural and historic features which make it distinctive, including parts of three National Landscapes (formerly Areas of Outstanding Natural Beauty), part of the New Forest National Park, over 16,000 listed buildings, over 240 conservation areas and a World Heritage Site. The high number of conservation areas reflects the importance of the county's heritage, much of which is recognised at national and international levels. Wiltshire's heritage is unique and outstanding, ranging from pre-historic monuments such as Stonehenge, to links with the industrial revolution, including canal and railway structures. Among the issues and challenges facing Wiltshire's heritage is the pressure from encroachment on its sensitive historic landscapes.
- 3.3. Wiltshire also includes an element of the Western Wiltshire Green Belt, which protects the openness of the countryside between Bath, Bradford-on-Avon and Trowbridge. The urban area of Swindon, while predominantly within Swindon Borough, has expanded into Wiltshire.
- 3.4. Deprivation across Wiltshire is generally low, and communities benefit from relatively safe environments. Wiltshire enjoys strong sub-regional links and is within commutable distance of London, Bristol, Swindon, South Wales and the south coast; for instance, via rail, the M4, A36 and A303.
- 3.5. Wiltshire's largest settlements are Chippenham, Salisbury and Trowbridge. They are designated in the adopted Wiltshire Core Strategy as 'Principal Settlements' which are the focus for growth due to their ability to provide infrastructure and services to the population. Below this, Market Towns, Local Service Centres and Large/Small Villages accommodate additional development but to a reduced extent.

#### **Gypsies and Travellers**

- 3.6. A well-established Gypsy and Traveller community exists in Wiltshire. Most Gypsies and Travellers in Wiltshire identify themselves as English Travellers or Romany Gypsies, with some Irish Travellers. These communities reside on a mix of local authority sites, privately owned sites and unauthorised sites. Research has shown that the majority of sites are within the north, west and south of the county. New Age Travellers can also be found in Wiltshire, although their settlement pattern is more transient with numbers increasing during the summer months. There are also a small number of travelling showpeople yards in the county.
- 3.7. It is often generalised that Gypsies and Travellers are a uniform, cohesive community, however the reality is they are a diverse group of communities which share some features such as nomadism but have their own histories and traditions. There is often fragmentation between different families and between cultural groups. The main cultural groups include Romany Gypsies, Irish Travellers, and New Age Travellers. Under the Equality Act 2010, several groups have recognition as ethnic groups protected against discrimination. These include English, Welsh and Scottish Gypsy Travellers, Irish

Travellers, and Romany Gypsies and Roma people. However, Showpeople and New (or New Age) Travellers are not recognised within these definitions and may not be protected (Parliament, 2019).

- 3.8. Many Gypsies and Travellers in Wiltshire pursue an active itinerant lifestyle and are generally self-employed, sometimes occupied in scrap-metal dealing, laying tarmac, seasonal agricultural work, casual labouring, and other employment. However, these traditional patterns are changing whereby the community has become increasingly settled, thereby increasing the demand for new permanent Gypsy and Traveller sites.
- 3.9. In accordance with guidance from the Ministry of Housing, Communities and Local Government (MHCLG), Wiltshire Council undertakes a bi-annual count of caravans across Wiltshire. Whilst caravans do not necessarily relate to the number of pitches, the count data is used to monitor the pressures on existing sites, both authorised and unauthorised.

#### **Neighbouring Authorities**

- 3.10. Through the DtC, the Council has engaged with neighbouring local authorities from the commencement of the plan-making stage, and continues to do so, to discuss, establish and, where necessary collectively address strategic cross-boundary issues that may relate to Wiltshire's Local Plan, including the draft Plan, the draft Wiltshire Local Plan review and any other respective Local Plan. There are 14 local planning authorities that border Wiltshire:
  - Swindon Borough Council
  - Cotswold District Council
  - Oxfordshire County Council
  - Vale of White Horse District Council
  - West Berkshire Council
  - Hampshire County Council
  - Test Valley Borough Council
  - New Forest District Council
  - New Forest National Park Authority
  - Dorset Council
  - Somerset Council
  - Bath and North East Somerset Council
  - Gloucestershire County Council
  - South Gloucestershire Council
- 3.11. The Council has also engaged with West Oxfordshire District Council as they are the lead authority for the Gypsy and Traveller, Travelling Showpeople Accommodation Assessment Including Boat Dwellers work being undertaken for the whole of Oxfordshire.
- 3.12. Figure 1 below illustrates the local authorities that border Wiltshire and their geographical relationship.
- 3.13. Since work began on developing the draft Plan, local government reorganisation has seen Mendip, Sedgemoor, South Somerset, Somerset West and Taunton, and

Somerset County Council form one new unitary authority on 1 April 2023. Dorset Council become a unitary council on 1 April 2019, encompassing the former districts of Purbeck, East Dorset, North Dorset, West Dorset, Weymouth and Portland, and Dorset County Council. The former neighbouring district and county planning authorities can be seen in Figure 2 below.

3.14. The draft Plan does not relate to the whole of the administrative area of Wiltshire Council, as it excludes that area of the New Forest National Park in Wiltshire, which is covered by the New Forest National Park Local Plan that was prepared by the New Forest National Park Authority.

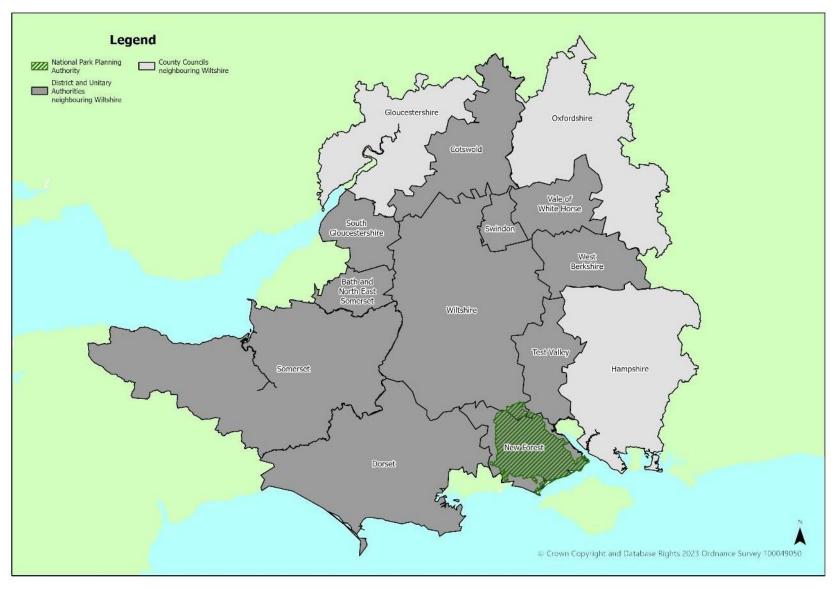


Figure 1: Map showing the current neighbouring local planning authorities in relation to Wiltshire Council

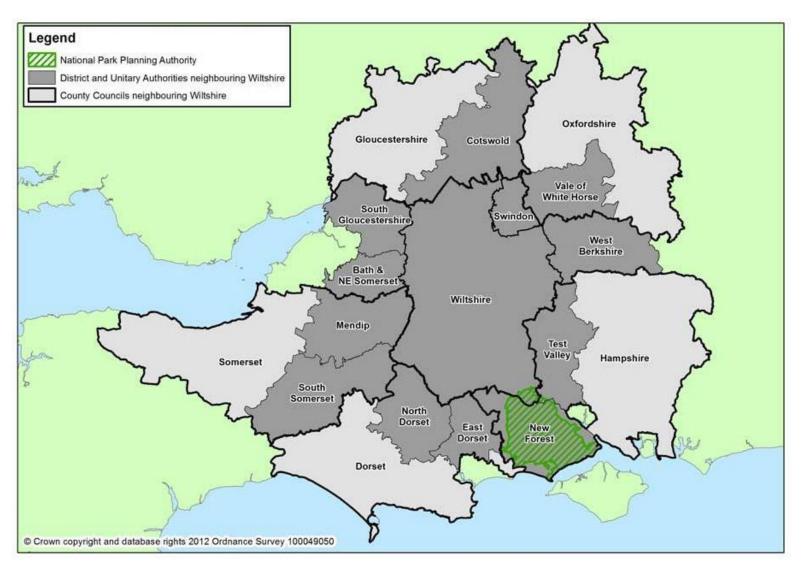


Figure 2: Map showing the authorities adjoining Wiltshire Council pre-Local Government reorganisation.

#### Collaborative working on cross boundary ecological designations

- 3.15. The Council as Local Planning Authority is required under the Habitats Regulations to ensure that any adverse impacts arising from development can be mitigated to avoid harm to internationally important nature conservation sites which are protected by law. This is at both the plan-making and decision-taking stage. There are several cross boundary ecological designations that fall within Wiltshire and the adjoining authority areas which require a collaborative approach between the authorities. These include:
  - Hampshire Avon Special Area of Conservation (SAC),
  - New Forest Protected Sites New Forest Special Protection Area (SPA), New Forest Special Area of Conservation (SAC) and New Forest Ramsar site
  - River Test/Solent Protected Sites
  - North Meadows SAC

#### Hampshire Avon Working Group

- 3.16. The Council is involved in the Hampshire Avon Working Group, which was formed to help deliver a package of mitigation for the management of phosphorus entering the watercourse within the Hampshire Avon catchment. Prescribed bodies and neighbouring planning authorities that are represented in the group are Natural England, the Environment Agency, New Forest District Council, New Forest National Park Authority, Wessex Water, Test Valley Borough Council, Dorset Council, and Bournemouth, Christchurch and Poole Council.
- 3.17. Over several years, the Council has worked collaboratively with the relevant partner authorities to respond to the control and management of phosphates pollution linked to development within the Hampshire Avon catchment, which included a Memorandum of Understanding (MoU) signed in 2018 between Wiltshire Council, New Forest District Council, New Forest National Park Authority, Natural England, Wessex Water and the Environment Agency. In March 2020 Natural England formally advised affected LPAs that all development that provides new overnight accommodation must achieve phosphorus neutrality prior to occupation, which superseded the MoU. The Hampshire Avon Working Group continues to meet quarterly to collaborate on this water quality issue, and this partnership is an effective to forum to consider wider pressures on the River Avon Special Area of Conservation such as water quantity.
- 3.18. The Government announced in December 2023 that the Council was to be awarded, as lead authority for the Hampshire Avon catchment, up to £9.8m for capital projects via the Local Nutrient Mitigation Fund to help pump-prime nutrient neutrality interventions in the catchment. This capital fund will also be supported with revenue funding to help deliver the mitigation projects. The condition of the funding is that it is replenished to deliver further mitigation to continue to support the delivery of growth. Where appropriate, developer contributions via planning obligations (section 106 legal agreements, section 111 agreements, Unilateral Undertakings) will be sought for planning applications able to use the Council-led scheme.
- 3.19. The grant has been awarded on behalf of all the local authorities in the Hampshire Avon catchment i.e. New Forest District Council, New Forest National Park Authority, Dorset Council, Bournemouth Christchurch and Poole Council, and Test Valley Borough Council and will be used to deliver projects in all those areas. It will be used to pump prime the supply of mitigation projects in the catchments to help progress this revised

- strategy and the local planning authorities meet regularly to discuss mitigation delivery associated with the grant funding.
- 3.20. In February 2024, Wiltshire Council introduced a new approach to enabling phosphorus neutral development to come forward within the Hampshire Avon catchment that falls within Wiltshire<sup>7</sup>. This is a scheme which enables the purchase of credits to offset phosphorus pollution, which sits alongside other potential offset solutions such as securing mitigation through private providers, or delivery of bespoke nutrient solutions on-site to be signed off by Natural England.

New Forest Project Steering Group

- 3.21. Joint working on the 'in-combination' recreational impacts arising from new development on the New Forest Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites is undertaken by Wiltshire Council with other authorities, led by the New Forest National Park Authority.
- 3.22. Wiltshire Council works with Bournemouth, Christchurch and Poole Council, Dorset Council, Eastleigh Borough Council, Natural England, New Forest District Council, New Forest National Park Authority, Southampton City Council and Test Valley Borough Council on mitigating the 'in-combination' recreational use impacts arising from new development that impacts on the New Forest SAC, SPA and Ramsar sites. A MoU dated September 2022 was drawn between relevant authorities up identifying 'zones of influence', arising from a shared evidence base, which was agreed to be used to ensure that additional recreational impacts arising from new residential and other forms of overnight accommodation development within respective local planning areas would be mitigated so that new development did not have an adverse impact on the New Forest SAC, SPA and Ramsar sites.
- 3.23. The Council's interim strategy was originally endorsed by Natural England in 2021 and involved funding SAMM measures through the CIL fund and larger developments delivering on-site Suitable Alternative Natural Greenspace (SANG) and Green Infrastructure. In May 2024, Wiltshire Council's Cabinet<sup>8</sup> approved an update to the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites (January 2022)<sup>9</sup> to mitigate and manage recreational pressures on the New Forest protected sites through developer contributions.
- 3.24. The Council continues to work with the relevant authorities towards the production of a joint strategy which will ultimately supersede the interim measures currently in place.

River Test/Solent Protected Sites

3.25. A small part of Wiltshire falls within the catchment area of the River Test/Solent. Since 2019, Natural England has required that new developments within catchments draining to the Solent must be nutrient neutral to prevent additional nutrient loading from urban runoff and sewage. While Wiltshire Council is not the lead authority for the Solent catchment area, the Council maintains an effective working relationship on nutrient

<sup>&</sup>lt;sup>7</sup> Phosphorus and nitrogen mitigation - Wiltshire Council

<sup>&</sup>lt;sup>8</sup> Wiltshire Council Cabinet - Revised New Forest Mitigation Strategy (7th May 2024)

<sup>&</sup>lt;sup>9</sup> Biodiversity and development - Wiltshire Council

matters with the Partnership for South Hampshire (PfSH) comprising of Portsmouth City Council, Southampton City Council, Eastleigh Borough Council, East Hampshire District Council, Fareham Borough Council, Gosport Borough Council, Havant Borough Council, New Forest District Council, New Forest National Park Authority, Test Valley Borough Council, Winchester City Council, and Hampshire County Council.

Wiltshire Council has adopted a strategic nitrogen mitigation scheme<sup>10</sup> for overnight 3.26. developments located in the River Test catchment in Wiltshire. The scheme enables nitrogen credits to be purchased for the offset of nitrogen entering the protected watercourse. The credit-based system sits alongside other potential offset solutions such as securing mitigation through private providers, or delivery of bespoke nutrient solutions on-site which must be signed off by Natural England.

North Meadow and Clattinger Farm SAC

Within the north of the county lies the North Meadow and Clattinger Farm SAC, which 3.27. is divided into two units - North Meadow near Cricklade; and Clattinger Farm near Ashton Keynes and Somerford Keynes. Both parts of the SAC lie within Wiltshire but are very close to the Gloucestershire and Swindon boundaries. Wiltshire Council has worked collaboratively with the adjoining authorities of Cotswold District Council. Swindon Borough Council and Natural England to agree an Interim Recreation Mitigation Strategy (May 2023) to cover the period 2023-2028. This establishes crossboundary zones of influence around the SAC, along with onsite and offsite mitigation measures to enable development to come forward. Meetings are held quarterly with Cotswold District Council, Swindon Borough Council and Natural England to collaborate on this strategic approach.

#### Gypsies and Travellers Development Plan 4. **Document**

- 4.1. The primary purpose of the Wiltshire Gypsies and Travellers DPD is to assess and provide for the future accommodation needs of gypsies and travellers and showpeople in Wiltshire. It will replace 'Core Policy 47: Meeting the needs of gypsies and travellers' of the Wiltshire Core Strategy (adopted January 2015).
- 4.2. The draft Plan covers the period to 2038, consistent with the plan period of the wider draft Wiltshire Local Plan review which is being prepared alongside it. Together both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire.
- 4.3. The draft Plan is being prepared in accordance with national planning policy including Planning Policy for Traveller Sites (PPTS 2023) and the National Planning Policy Framework (NPPF, December 2023). It is based on robust evidence in the form of a Gypsy and Traveller Accommodation Assessment (GTAA 2024)<sup>11</sup> to establish the

<sup>&</sup>lt;sup>10</sup> Phosphorus and nitrogen mitigation - Wiltshire Council

<sup>&</sup>lt;sup>11</sup> Wiltshire Council Gypsy and Traveller Accommodation Assessment (June 2024)

accommodation needs of Wiltshire's travelling community from 1 April 2024 to 31 March 2038.

#### **Regulation 18 Consultation 2021**

- 4.4. The draft Plan has been subject to the first stage of public consultation (Regulation 18) in line with the Town and County Planning (Local Planning) (England) Regulations 2012.
- 4.5. Consultation and engagement on the draft Plan is being carried out in accordance with the measures set out in Wiltshire's Statement of Community Involvement<sup>12</sup> that was adopted by the Council in 2020.
- 4.6. The Council started preparing the draft Plan in 2021 and prepared a pre-publication draft Plan (Regulation 18), setting out the scope of the Plan informed by an up-to-date evidence base. The first round of public consultation was held between 13 January and 9 March 2021. The Council consulted with a range of stakeholders, including prescribed bodies, neighbouring local authorities, both statutory and non-statutory bodies, as well as local communities.
- 4.7. The Council received consultation responses to the Regulation 18 consultation from the following prescribed DtC bodies and specific consultation bodies:
  - Environment Agency
  - Highways England
  - Thames Water
- 4.8. The Council received consultation responses to the Regulation 18 consultation from the following neighbouring authorities:
  - Dorset County Council
  - New Forest National Park Authority
  - South Gloucestershire Council
  - South Somerset District Council
  - West Berkshire Council
- 4.9. Alongside formal notification of the Regulation 18 consultation, which was sent to all the neighbouring authorities and prescribed bodies, individual and bespoke emails were sent to each of the DtC partners considered of relevance to the draft Plan. These bespoke emails built upon the Council's evidence base. Each was tailored to provide a summary of the draft Plan approach and pick up relevant details to their organisation, to put them in a good position to understand the scope of the draft Plan and how it might impact them.
- 4.10. All of the consultation responses received were published within the Gypsies and Travellers Development Plan Document Consultation Report (September 2021)<sup>13</sup>. Table 1 presents a summary of the main actions arising from the consultation.

<sup>&</sup>lt;sup>12</sup> Statement of Community Involvement (July 2020)

<sup>13</sup> Gypsies and Travellers Development Plan Document Consultation Report (September 2021)

Table 1: Summary of actions arising from the Regulation 18 Consultation Report

### **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.
- 4.11. Following the Regulation 18 consultation, the Council reviewed the consultation responses and feedback, outcomes from the ongoing DtC engagement and carried out additional/refreshed evidence base work where appropriate. This has shaped the scope and policies of the draft Plan.

### **Regulation 19 Consultation 2024**

- 4.12. The draft Plan was published as part of the Regulation 19 consultation following approval from the Council's Cabinet<sup>14</sup> and Full Council<sup>15</sup> in July 2024.
- 4.13. Throughout the plan-making process, focused DtC communication has occurred with prescribed bodies and neighbouring authorities. The GTAA has been kept up to date during the Plan's preparation and through its preparation, engagement has been undertaken with both the traveller community and neighbouring authorities. In 2020 the Council commissioned a new GTAA, this included an extensive consultation with neighbouring planning authorities. A further GTAA was produced in 2022 and most recently in 2024, both of which build upon the collaborative work between the Council and neighbouring authorities. Extensive collaborative working with statutory bodies during the site selection process has resulted in the most suitable sites being taken forward for allocation as either new sites or those most suitable for intensification. A full breakdown of DtC engagement is contained within Appendix 1.
- 4.14. The Regulation 19 consultation was held between 20 August and 4 October 2024 to seek further feedback from the county's communities, businesses, key stakeholders, neighbouring local authorities and statutory bodies. Comments at this stage should focus on the draft Plan's legal compliance and procedural compliance, including the DtC, and the 'soundness' of the draft Plan, and will go on to be considered by the Planning Inspectorate, who will undertake an independent examination of the draft Plan before it can be adopted.

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<sup>&</sup>lt;sup>14</sup> <u>Wiltshire Council Cabinet - Gypsies and Travellers Development Plan Document - Pre-submission</u> Draft Plan (15 July 2024)

<sup>&</sup>lt;sup>15</sup> Wiltshire Council - Council Meeting (24 July 2024)

- 4.15. Following the publication of the DtC Report (August 2024)<sup>16</sup>, Wiltshire Council sought representations on its draft Plan between 20<sup>th</sup> August 2024 and 4<sup>th</sup> October 2024 through the Regulation 19 consultation process. Each representation received will be submitted to the Planning Inspector when the draft Plan is submitted for examination.
- 4.16. For the purposes of this document, Appendix 1 provides a summary of representations received from prescribed bodies and neighbouring planning authorities in the context of Wiltshire Council's compliance with the DtC. The Council defines a 'Strategic Partner' as those bodies falling within the definition of section 33A (1) and (9) of the Planning and Compulsory Purchase Act 2004 (as amended), with the bodies described within 33A (1)(c) defined within Part 2 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 4.17. The Council received consultation responses to the Regulation 19 consultation from the following prescribed DtC bodies and specific consultation bodies:
  - Environment Agency
  - Highways England
  - Natural England
  - Thames Water
  - Wessex Water
  - Network Rail
- 4.18. The Council received consultation responses to the Regulation 19 consultation from the following neighbouring authorities:
  - Swindon Borough Council
  - Bath and North East Somerset Council
  - Dorset Council
  - New Forest National Park Authority
  - New Forest District Council
  - South Gloucestershire Council
  - South Somerset District Council
  - West Berkshire Council
- 4.19. There was no representation received from Historic England to the Regulation 19 consultation, but they have subsequently confirmed that they do not have any comments on the draft Plan. Therefore, there are not considered to be any specific issues associated with the DtC process requiring further consultation.
- 4.20. Insofar as the DtC and ongoing discussions are concerned, the Council would note that Swindon Borough Council considers that further work under the DtC should be undertaken relating to potential cross boundary issues around Travelling Showpeople and emergency stopping sites in particular. Bath and North East Somerset Council also seek continued engagement through the DtC process to review household formation

<sup>&</sup>lt;sup>16</sup> Wiltshire Gypsies and Travellers Development Plan Document - Duty to Cooperate Statement (August 2024)

and any impacts from the policies proposed in the Plan. Somerset Council also noted that they would continue to engage with the Council through the DtC.

## 5. Strategic cross boundary matters discussed under the Duty to Cooperate

- 5.1. Liaison with prescribed bodies and neighbouring local authorities in relation to the Wiltshire Gypsies and Travellers Development Plan Document is ongoing. The main strategic matters on which we are engaging are summarised below. Please note this list is not exhaustive and information is also provided at Appendix 1.
  - **Objective 1:** To meet identified accommodation needs for gypsy and traveller pitches and travelling showpeople plots to 2038 through site allocations, broad locations for growth and a policy framework for assessing proposals.
  - **Objective 2:** To make provision for three council operated emergency stopping places to provide temporary accommodation.
  - Objective 3: To deliver well-designed sites in keeping with their surroundings, and in appropriate and sustainable locations with access to services and facilities which respect both the interests of the settled and traveller community.
  - Objective 4: To set out the approach to meeting needs for culturally appropriate accommodation for gypsies and travellers that do not meet the planning definition.

## Cross boundary issues discussed with neighbouring authorities

- 5.2. Bath and North East Somerset Council A key issue raised within prior meetings as part of work under Regulation 18 had been whether there would be an unmet need request at this Regulation 19 stage, in addition to the issue of whether the approach to dealing with household growth (and new households formed by children, etc.) will potentially have implications for communities or sites within B&NES. No formal request to B&NES to consider helping to address unmet needs has been issued. This will be kept under review as part of the monitoring of the Plan.
- 5.3. Cotswold District Council No cross-boundary issues have been identified to date. The latest GTAA completed as a joint commission across the Gloucestershire authorities establishes that their needs cannot be met. However, Cotswold District Council are using different methods to overcome the shortfall.
- 5.4. Dorset Council No cross-boundary issues have been identified. There is a legal case for a family where unauthorised sites have resulted in enforcement cases in both Wiltshire and Dorset that is being dealt with outside the scope of the draft Plan.
- 5.5. Somerset Council Prior to the reorganisation of councils in Somerset, no cross-boundary issues had been identified with Mendip District Council and South Somerset District Council.
- 5.6. South Gloucestershire Council No cross-boundary issues have been identified to date. The latest GTAA completed as a joint commission across the Gloucestershire authorities establishes that there is a high level of need across the area, South

- Gloucestershire Council is confident this can be accommodated through a combination of intensification and new sites.
- 5.7. Swindon Borough Council There is a travelling showpeople site that can no longer be accommodated within Swindon Borough; therefore, Swindon Borough Council may seek a site elsewhere. This is an issue which will be kept under review through ongoing collaboration with Swindon Borough Council, with a view to preparing an agreed Statement of Common Ground.
- 5.8. Test Valley Borough Council No cross-boundary issues have been identified to date. The latest GTAA completed establishes that there is a need which the local authority are unable to meet at present. The local authority is using different methods to overcome the shortfall, including commissioning a GTAA pitch delivery paper.
- 5.9. Wiltshire Council will continue to maintain proactive discussions with neighbouring authorities to identify and overcome any future cross-boundary issues that may arise.

#### Strategic issues discussed with prescribed bodies

- 5.10. Environment Agency Consideration should be given to the protection of drinking water supplies. Sites should not be located within Source Protection Zone 1, and ideally not located within Source Protection Zones 2 and 3 either This guidance is incorporated into the site selection criteria to ensure the Environment Agency's advice is addressed. The Environment Agency suggested a modification to require risk assessments for land contamination, and in response to this, potential changes to the Plan have been proposed.
- 5.11. Natural England It should be ensured that future development helps address and manage impacts on various protected sites within and around Wiltshire. This involves joint working with Natural England, the Environment Agency, and a wide range of adjoining authorities, as described in detail within Section 3 of this statement.

## 6. Addressing strategic cross boundary issues

- 6.1. The Council has, and will continue to, work constructively with its DtC partners and other relevant bodies throughout the preparation of the draft Plan, building on existing working relationships and arrangements for engagement.
- 6.2. The emphasis of the engagement with prescribed bodies and neighbouring authorities seeks to achieve effective and deliverable policies in the draft Plan that provide sites and pitches to support current and projected levels of objectively assessed need, whilst also considering the needs of neighbouring authorities.
- 6.3. Cooperation and engagement with prescribed bodies and neighbouring authorities is iterative and continuous throughout the plan-making process, especially at key stages (Regulation 18 and 19). The Council employs a range of positive and constructive methods which are appropriate and proportionate to the strategic matters/issues that require consideration through dialogue. Whilst no cross-boundary issues have been

identified to date, the Council will continue to work with partners and relevant bodies and should any issues arise, the Council will seek to try to secure the most effective outcomes for the parties involved. The approaches listed below can be used as methods of engagement. The methods used depend upon the nature of the issue and the partners involved.

- Meetings
- Workshops
- Written exchange
- Formal consultations
- Memoranda of Understanding
- Statements of Common Ground (ongoing method that will be used throughout the plan-making process where appropriate)
- Other joint working mechanisms
- 6.4. Partnership arrangements have been fit for purpose for several years and were agreed with the relevant strategic partners to ensure that cooperation has led to positive outcomes for all parties involved. In seeking to produce effective and deliverable policies on strategic cross boundary matters, the Council has sought to:
  - Align planning policies with those of neighbouring local planning authorities.
  - Prepare mutually beneficial evidence.
  - Address cross-boundary issues.
- 6.5. Consultation responses from prescribed bodies and neighbouring planning authorities to the Regulation 18 consultation on the draft Gypsies and Travellers DPD are detailed in the 2021 Consultation Report<sup>17</sup>.
- 6.6. The full consultation responses from prescribed bodies and neighbouring planning authorities to the Regulation 19 consultation are detailed in the Regulation 22 Statement prepared following the close of the consultation.

## 7. Conclusion and Key Outcomes

- 7.1. The Gypsies and Travellers Development Plan Document has been in preparation since 2021, the same year the Regulation 18 consultation was undertaken. The main strategic issues to be addressed through the DPD include managing the supply of sites and pitches to meet the needs of the travelling community whilst also balancing environmental matters such as: phosphate neutrality, addressing nitrates, water resource management and conserving and enhancing biodiversity and nationally important landscapes. Some of these matters have existing agreements and/or partnerships in place with statutory bodies and neighbouring authorities. It has been important to maintain constructive dialogue with interested parties and this will continue through the plan-making process including examination and beyond.
- 7.2. Since the initial preparation of the draft Plan began in 2021 there has been continuous engagement with prescribed bodies and neighbouring authorities on how the needs of

<sup>&</sup>lt;sup>17</sup> Gypsies and Travellers Development Plan Document Consultation Report (September 2021)

the gypsy and traveller community are to be met. In 2021 there was a wider Regulation 18 consultation exercise focusing on key elements of what would eventually become the Regulation 19 'Pre-Submission version' of the draft Plan. Throughout the preparation of the draft Plan dialogue with prescribed bodies and neighbouring planning authorities has been maintained to ensure that all interested parties have had opportunities to be briefed on and help inform the content of the draft Plan.

7.3. Before the draft Plan is submitted for Examination, further dialogue with prescribed bodies and neighbouring authorities will be undertaken, including on the preparation of any Statements of Common Ground that may be identified.

## Appendix 1: Duty to Cooperate responses

Appendix 1 to this statement sets out an overview of the strategic partners and lists the potential strategic cross-boundary issues that have arisen with the prescribed body and neighbouring planning authority.

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
Bath and North East Somerset Council (B&NES)	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).  Position as of June 2024 – Bath and North East Somerset Council confirmed they are planning for Gypsy and Traveller issues through the emerging Local Plan. They are seeking to produce the draft Local Plan in January 2025, progressing to Regulation 19 consultation in February/March 2025, with examination in June 2025. A GTAA is also being carried out, to run over the period 2021 – 2034. This will inform the Regulation 19 draft Local Plan and identifies a modest scale of need. The Council are looking at a criteria-based approach through intensifying private sites rather than making allocations.  Regulation 19 consultation – B&NES welcome the opportunity to continuing discussing the approach being taken to Gypsy and Travellers needs within Wiltshire in order to understand and ensure the implications for communities in B&NES are understood and appropriately managed. A key issue raised within prior meetings as part of work under Regulation 18 had been whether there would be an unmet need request at Regulation 19 stage, in addition to the issue of whether the approach to dealing with household growth (and new		preparation of the Wiltshire Gypsies and Traveller Development Plan Document:	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	households formed by children etc) will potentially have implications for communities or sites within B&NES. It is noted that no formal request to B&NES to consider helping to address unmet needs has been issued.			
	B&NES suggest careful monitoring of whether and how the need for pitches for households forming in Wiltshire that do not meet the planning definition is being met. The information from this monitoring will need to inform future review of policy and may, dependent on the conclusions, require consideration to be given to identifying additional sites in areas within Wiltshire close to where the need is arising. Ongoing collaboration and dialogue is requested on this matter.			
	Wiltshire Council would welcome the opportunity to continuing discussing the approach being taken to Gypsy and Travellers in order to understand and ensure the implications for communities in B&NES are appropriately managed both through this Development Plan Document and subsequent reviews.			
Cotswold District Council	is too early to say yet whether Cotswold District will be able to accommodate its additional needs up to 2041, although the adopted Cotswold District Local Plan 2011-2031 was able to fully meet Gypsy and Traveller needs within the district. It is	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development	

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	Wiltshire border. Officers are unaware of any specific cross-boundary issues resulting from these sites.  Position as of June 2024 – The Council completed its Regulation 18 consultation on a draft Local Plan in April 2024 and has Regulation 19 consultation scheduled for January 2025. GTAA has been completed as a joint commission across the Gloucestershire authorities. This has established that need cannot be met. A Call for Sites has been carried out as part of the Regulation 18 consultation and alternative ways of encouraging land release are being investigated.  Regulation 19 consultation – no response received.			
Dorset Council	Position as of June 2024 – No cross-boundary issues are currently identified. It is confirmed that Gypsy and Traveller needs will be planned for within the Local Plan. The Local Plan was consulted on in 2021, which included a proposed allocation to meet the needs of gypsies and travellers. The Council's Local Development Scheme has recently been updated and provisional dates for scoping and early engagement are expected to take place in September 2024. GTAAs were undertaken in 2017 and 2022, the latter showing an increase in numbers. This may need further updating.  Issues experienced in the Dorset area include temporary permissions and the nutrient pollution potentially affecting Poole Harbour protected sites. There is a temporary seasonal permission for the Dorset Steam Fair.	Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	Ongoing enforcement cases in Dorset and Wiltshire linked with the same family were discussed in brief. Unauthorised sites in Wiltshire form part of identified need, and the Councils committed to continue to engage on this matter to avoid double counting of needs in any future GTAA updates undertaken by Dorset and Wiltshire Council.  Regulation 19 consultation – Dorset Council does not consider that the distribution of proposed allocations and safeguarded Gypsy and Traveller sites are likely to raise any significant strategic cross boundary matters.  The broad location of search in the south-east of Wiltshire for emergency stopping sites extends up to the shared boundary between Dorset and Wiltshire. Dorset Council welcome for further constructive and active engagement on this issue as part of ongoing co-operation between the councils.			
Dorset County Council  From 1 April 2019 Dorset County Council has combined with the former districts of Purbeck, East Dorset, North Dorset, West Dorset, and Weymouth		Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development Plan	No outstanding strategic issues. Ongoing collaboration (please see Dorset Council).

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
and Portland to become Dorset Council				
	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development	No outstanding strategic issues. Ongoing collaboration (please see Dorset Council).
	Regulation 18 consultation – The Environment Agency advised Wiltshire Council that sites should not be located within Source Protection Zone (SPZ) 1, and ideally not within SPZ2/3 either, unless strict measures can be put in place to protect groundwater. Reference to this should be included in the policy document. This advice informed the Council's site selection process.	Consultation exercises and events Meetings Email correspondence	preparation of the Wiltshire Gypsies and Traveller	•
	Email correspondence from November 2021 to February 2024 – Correspondence regarding site assessment work			
	It was confirmed in November 2021 that the Council has screened out sites falling in Source Protection Zone 1, and all sites are located in flood zone 1. The Environment Agency confirmed it is satisfied that comments can be made at the presubmission stage (Regulation 19).			
	Specific advice was given in February 2022 by the			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	Environment Agency regarding 6 Hawkeridge Road.  It was confirmed in February 2024 by the Environment Agency that as all sites are in Flood Zone 1 the Environment Agency would not need to make comment, and they would rely on Wiltshire Council's drainage officers to make comment in relation to the non-fluvial sources of flooding.  Regulation 19 consultation – The Environment Agency suggest the Plan requires planning applications to include a sequential approach to site design to ensure built development is outside of flood zones 2 and 3. This is reflected within national policy. The Environment Agency also suggest a modification to require risk assessments for land contamination, and in response to this, potential changes to the Plan have been proposed.			
Gloucestershire County Council (GCC)	Regulation 19 consultation – GCC comment on the impact of Traveller sites on climate in particular the contribution made by transport to emissions and how proximity to public transport, walking and cycling infrastructures play a role in reducing transport emissions. They suggest emphasising this in the site selection report. They also suggest tables with colour codes in the site selection report should be accompanied with a key. A response to these comments can be found in the Regulation 22 report.  They ask whether policy GT3 will impact on nearby Air Quality	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies	No outstanding strategic issues for this plan. Ongoing collaboration.
	Management Areas. Wiltshire Council does not consider that			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	traffic to and from traveller sites is likely to considerably worsen air quality in those areas due to the limited growth associated with this land use.			
Hampshire County Council	No issues raised.  Regulation 19 consultation – no response received	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller	
Historic England	Email correspondence from November 2021 to February 2022  It was noted in November 2021 that Historic England had insufficient capacity to assess proposed sites and the Council's heritage officers should be engaged. Links were provided to national heritage guidance that should inform the plan-making process.  Specific advice was later received in relation to sites at Old Sarum, Lopcombe Corner and Hillbilly Acre, following advice from the Council's heritage officers.  Regulation 19 consultation – No representation received but Historic England has confirmed they have no comments on the Gypsies and Travellers Development Plan Document.	Consultation exercises and events Meetings Email correspondence	preparation of the Wiltshire Gypsies and Traveller	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
England)	Regulation 18 consultation – National Highways confirmed they were satisfied with the scope of the draft Plan and the three objectives, particularly objective 3 regarding appropriate access.	correspondence	preparation of the Wiltshire Gypsies and Traveller	

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	In relation to Policy GT18 (Petersfinger Business Park) NH suggest any re-arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.			
Homes England	<ul> <li>Meeting and email correspondence relating to the following:</li> <li>Affordable Homes Programme</li> <li>Affordable housing prospectus which included the funding allowance for new traveller sites.</li> <li>Discussions about site delivery and potential funding opportunities.</li> <li>Potential pitches to rent, service plots and leasehold</li> </ul>	Consultation exercises and events Meetings Email correspondence	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.
Oxfordshire County Council	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).  Position as of July 2024 – It was confirmed that the GTAA is being led by district councils rather than the county council. West Oxfordshire District Council is leading on the work with Cherwell District Council, South Oxfordshire District Council and Vale of White Horse District Council.Regulation 19 consultation – no response received.	Consultation exercises and events Meetings Workshops Email correspondence	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.
Mendip District Council From 1 April 202319 Mendip District Council has been	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).	Consultation exercises and events Meetings	During the preparation of the Wiltshire Gypsies and Traveller Development	_

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
encompassed within the unitary Somerset Council		Workshops Email correspondence	Plan Document: 2021 to 2024	Somerset Council).
Natural England	The Council is required under the Habitats Regulations to ensure that any adverse impacts arising from development can be mitigated to avoid harm to internationally important nature conservation sites which are protected by law. There are a number of cross boundary ecological designations that fall within Wiltshire and the adjoining authority areas which require an ongoing and collaborative approach between the authorities and Natural England, as is described in more detail within Section 3 of this statement.  Regulation 19 consultation – Having considered the Habitats Regulations Assessment and the measures proposed to mitigate all identified adverse effects Natural England are satisfied and have no objection to the proposals, providing that all mitigation measures are appropriately secured in any permission given.	Consultation exercises and events Meetings Email correspondence	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	•
New Forest District Council	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).  Position as of June 2024 – The Council confirmed that the adopted Local Plan (2020) includes a criteria-based policy for gypsies, travellers and showpeople. An earlier plan includes allocation for 8 pitches. This was carried out through a	Consultation exercises and events Meetings Workshops	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	, ,	Email correspondence		
	The Council are currently undertaking a review of the Local Plan with Regulation 18 consultation expected towards the end of summer 2024 which will update the GTAA in conjunction with New Forest National Park Authority.			
	Regulation 19 consultation - It should be noted that New Forest District Council and the New Forest National Park Authority are undertaking their own GTAA that will cover this area. The GTAA will inform future Local Plan policies for the New Forest area.			
	NFDC welcome the recognition of international protected sites in paragraph 3.37 but consider this should be reflected in the wording of Policy GT3 as well as recognition that likely significant effects from any new sites that come forward may need fresh consideration under Appropriate Assessment, as required by the Habitat Regulations. Wiltshire Council consider this requirement is already set out in national legislation.			
	NFDC welcome the overall conclusion of the Habitats Regulation Assessment that the draft Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and policies. This will require ongoing monitoring in line with the Habitats Regulations,			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	particularly if new sites, including Emergency Stopping Sites are to be identified in future.			
New Forest National Park Authority (NFNPA)	Wiltshire's draft Plan excludes the area of the New Forest National Park in Wiltshire which is covered by the New Forest National Park Local Plan.  The Authority supports the draft Plan objectives, especially Objective 3 which states that sites should be well-designed and in appropriate, sustainable locations – which align with		preparation of the Wiltshire Gypsies and Traveller	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	The Authority supported the principle of planning for emergency stopping places and requested an amendment to criteria i. to refer to the New Forest National Park and National Landscapes.			
	<b>Position as of March 2022 –</b> No cross-boundary issues identified (GTAA, 2022).			
	Position as of June 2024 – Confirmed that the Local Plan was adopted in 2019 which allocated a site to meet the need for 1 pitch. There is no allocation for travelling showpeople, any needs are subject to a criteria-based policy. It was confirmed that future work may include commissioning a joint GTAA with New Forest District Council.			
	Regulation 19 consultation - It is noted that the Key Diagram in Figure 1 helpfully illustrates the boundary of the New Forest National Park around the southern part of Wiltshire. However, it is not entirely clear in this diagram alone what the extent of the draft Plan area is, although this is helpfully set out in paragraph 1.2. A line showing the extent of the draft Plan area rather than Wiltshire Council administrative area would be more helpful. Wiltshire Council have proposed a modification accordingly.			
NHS England	No issues raised.	Consultation exercises and events Meetings	preparation of the Wiltshire Gypsies and Traveller	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
North Dorset District Council  From 1 April 2019  North Dorset District  Council has been  encompassed within the unitary Dorset  Council		Email correspondence Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development	No outstanding strategic issues. Ongoing collaboration (please see Dorset Council)
Council has combined with the former districts of Mendip, Sedgemoor, South Somerset, and Somerset West and Taunton to become	from 2006 up to 2015. There are four plans in the Local Development Scheme including a new unitary plan and minerals and waste plan – the Council is currently commissioning an evidence base including a new GTAA. The existing GTAA evidence dates back to 2013.	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<b>Regulation 19 consultation</b> - Somerset Council will continue to engage and work with Wiltshire Council on cross-boundary strategic planning matters including Gypsies and Travellers through the Duty to Co-operate.			
South Gloucestershire Council	South Gloucestershire, including their diverse make up. Wiltshire's Plan to meet the travelling communities' needs are supported, including the three objectives proposed. The findings of Wiltshire's GTAA are noted. South Gloucestershire Council is preparing a refresh of its GTAA. The sequential approach as employed by Wiltshire is likely to be similar to South	Consultation exercises and events Meetings Workshops Email correspondence	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	•
	Position as of June 2024 – It was confirmed that gypsy and traveller issues will be planned for through the Local Plan, for which Regulation 18 consultation was undertaken in early 2024. The Regulation 19 consultation is scheduled to go ahead towards the end of 2024/beginning of 2025 and submission before June 2025.  A GTAA has been conducted which shows a high level of need. While there is significant need identified (132), there is			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	confidence this can be accommodated through combination of intensification and new sites (council owned and private land). The Council is also looking to strategic sites and what can be brought forward as part of them. A third of the need should come through social rent – likely to be delivered on council-owned land. The Council has seen a marked reduction in the number of temporary accommodation/unauthorised encampments due to action taken at a local level by Parish/Town Councils The evidence does not point to a need for transit accommodation. No cross-boundary issues are identified currently.			
	Regulation 19 consultation - The Council is generally supportive of the approach taken through the draft Plan to meeting the accommodation needs of Wiltshire's travelling communities. The approach taken through Policy GT1 to meeting needs is considered to be sound, sensible and pragmatic, and is broadly consistent with approach the Council is taking to meeting needs in South Gloucestershire. It is noted that Wiltshire's approach and that of the South Gloucestershire Council diverge as this policy relates only to the needs of those travellers who meet the planning definition of "gypsies and travellers" and "travelling showpeople" as per Planning Policy for Traveller Sites (PPTS). The needs of those who do not meet these definitions are instead addressed through Policy GT4. The matter is raised as an observation only. Wiltshire's approach to safeguarding sites (Policy GT2) is also considered to be a sound, sensible and pragmatic, reflecting local circumstances. Support for Policy GT3.			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	South Gloucestershire state that their GTAA recommends that there is no need for a formal public transit site in South Gloucestershire at that time, however it did recommend that the situation should continue to be monitored and management-based approaches such as negotiated stopping should be considered.			
South Somerset District Council From 1 April 2023 South Somerset has been encompassed within the unitary Somerset Council.		Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development Plan Document:	No outstanding strategic issues. Ongoing collaboration (please see Somerset Council).
Swindon and Wiltshire Business and Growth Unit	No issues raised.	Consultation exercises and events	preparation of the Wiltshire Gypsies and Traveller	
Swindon Borough Council	Position as of June 2024 - The Council has appointed a consultant to produce an updated GTAA report 2024 and awaiting draft reporting. The outcomes from this reporting are to inform policy and allocations within the Council's emerging new Local Plan with an end plan date of 2043. It is anticipated that	Consultation exercises and events	preparation of the Wiltshire Gypsies and Traveller	No outstanding strategic issues for this plan. SBC is seeking to meet its needs in

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	the report will identify a requirement to meet needs for both Gypsy and Travellers and Travelling Showpeople. The Chiseldon Firs transit site was also noted as subject to refurbishment  Regulation 19 consultation - It is noted within the DtC Statement under para 5.5 reference to Travelling Showpeople need within Swindon Borough and at the time of discussion that the Council may seek a site elsewhere if unable to accommodate. It was considered that this issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.  Since this period of engagement on the DPD evidence, Swindon Borough Council (SBC) is now in receipt of a first draft updated GTAA report that includes the Borough's needs requirements and considers allocation options to 2043. The Council will engage more fully once this report is available for issuing for wider DtC partner input. SBC is seeking to meet its needs in full. Should this not be possible following the outcome of the site appraisal work, SBC would like to continue further constructive engagement with Wiltshire Council and other Local Authorities on this matter.  The Council looks forward to continuing to work constructively with the Council and in particular on broad locations for emergency stopping sites and wider practical policy matters. Work will commence on a Statement of Common Ground before submission.		Plan Document: 2021 to 2024	full but should this not be possible following the outcome of the site appraisal work, SBC would like to continue further constructive engagement with Wiltshire Council and other Local Authorities on this matter. It was considered that this issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.  Ongoing collaboration.

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
Test Valley Borough Council	Correspondence (GTAA 2024) – Email correspondence in February 2024 confirmed there are no cross-boundary matters relating to gypsies and travellers. The draft Local Plan 2040 (Regulation 18 Stage 2) shows an updated need for gypsy,	Consultation exercises and events Meetings Workshops Email correspondence	preparation of the Wiltshire Gypsies and Traveller Development	•
Vale of White Horse District Council	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).  Position as of June 2024 – Vale of White Horse DC and South Oxfordshire District Council are preparing a joint Local Plan which will also address gypsy and traveller needs. A Preferred Options consultation was undertaken in February 2024 and a Regulation18 consultation is scheduled for late 2024 with the intention to submit before June 2025. All Oxfordshire authorities are working collaboratively on a joint GTAA for the whole of	Consultation exercises and events Meetings Email correspondence	preparation of the Wiltshire Gypsies and Traveller	-

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	Oxfordshire, and preliminary findings are not currently available. Given the changes to the definition, it is predicted that numbers will have increased. Any comments/issues relating to cross-boundary matters will likely be raised during the Regulation 19 consultation.  Regulation 19 consultation – no response received			
West Berkshire Council	encampments, depending on where they will be located.  Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).  Correspondence (GTAA 2024) – There are cross-boundary.	exercises and events  Meetings  Workshops  Email correspondence	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	•

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	Wiltshire to stay. Residents also travel between districts (and across the UK) for work purposes, and travel into Wiltshire to visit family. Not all family members in the south-west have a permanent base, and therefore lead a roadside existence.			
	In January 2024 it was updated in relation to the potential site north of Bayden that the site is not occupied at present.			
	The main routes running through WBC are to and from London, Swindon, and Oxfordshire. There does not appear to be a notable relationship between WBC and WC by comparison			
	Position as of June 2024 – The examination for the West Berkshire Local Plan is underway and awaiting comments and actions from the Inspector. The Local Plan includes a general traveller policy. The Council is working towards producing a separate gypsies and travellers DPD alongside the Local Plan. A call for sites yielded a limited response, and there has been some difficulty finding sites. The next stages for this process will be scoping / Sustainability Appraisal (SA). Identified needs are not high (30 pitches with a residual need of 20) but this is expected to increase following the results of the next GTAA.			
	Regulation 19 consultation - Wiltshire Council and West Berkshire Council have previously discussed the approach taken and whether there are any cross-boundary issues (none were raised). Therefore, this meets the duty to co-operate."			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
West Oxfordshire District Council	identified (GTAA, 2022).  Position as of June 2024 – A joint up to date GTAA has been undertaken between all Oxfordshire local authorities, West Oxfordshire District Council are leading on this. Provisional outcomes suggest that there are no cross-boundary issues identified.	exercises and events Meetings	preparation of the Wiltshire Gypsies and Traveller Development	•



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#### **APPENDIX 4**

## Schedule of Proposed Changes to the Gypsies and Travellers Development Plan Document Pre-Submission Draft (Regulation 19)

This document sets out a schedule of changes that are proposed to be made to the pre-submission draft Wiltshire Gypsies and Traveller Development Plan Document for consideration by the Inspector through the Examination. The proposed changes vary in nature, and have therefore been categorised into four tables, as set out below:

- Table 1: Modifications that relate to the removal of policies and may be considered main modifications.
- Table 2: Other modifications that may be considered main modifications.
- Table 3: Modifications that relate to amendments to the Policies Map.
- Table 4: Modifications that relate to amendments considered to be minor modifications.

Where proposed changes require amendments to figures in the Plan, these are introduced in the Tables with the figures included in the Annex at the end of this schedule.

The schedule of changes may be added to as the Gypsies and Travellers Plan progresses through the next stages of the process.

Table 1: Modifications to the Wiltshire Gypsies and Travellers Plan Pre-Submission Draft (Regulation 19) that relate to the removal of policies and may be considered main modifications

Policy / Page / Paragraph reference	Reason for change	Change
Paragraphs 4.138-4.143, Policy GT30 (Whistley Road) and Figure 26	Site is no longer available and should be removed from the Plan.	Delete paragraphs 4.138-4.143, Policy GT30 and Figure 26.  [Consequential changes required elsewhere in the Plan.]

Table 2: Other Modifications to the Wiltshire Gypsies and Travellers Plan Pre-Submission Draft (Regulation 19) that may be considered main modifications

Policy / Page / Paragraph reference	Reason for change			Change	
Paragraph 3.18, Figure 1: Key Diagram	In the interest of accuracy	Insert new text at the with paragraph 1.2:	end of Paragraph	n 3.18 to clarify the	extent of the Plan area in line
		The Plan area excludes the part of Wiltshire which is in the New Forest National Park, where the New Forest National Park Authority is the local planning authority.			
		Amend Legend by inserting:			
		"(excluded from the Plan area)" after 'New Forest National Park'.			
Figure 1 Ley Diagram	To reflect the proposed deletion of allocation.	Remove Policy GT30 (Whistley Road) Gypsy and Traveller new site allocation from the Key Diagram.			
ကြံable 3 (paragraph 3.20) ၂၂ ၂၂	In the interest of accuracy	Amend Table 3 to reflect updated planning permissions since 31 July 2024 and the removal of Policy GT30 (Whistley Road):  Table 3: Supply of pitches and plots against 2029 targets			
			Gypsy and Traveller Pitches	Travelling Showpeople Plots	
		2024-29 Need (a)	81	8	
		Planning permissions (b)	17*	-	
		Site intensification (c)	44	8	
		New site allocations (d)	34	-	
		Total Supply (e) = (b+c+d)	95	8	
		Surplus = (e) - (a)	14	0	
		Years of supply 2024-29	5.86	5.00	
		*Includes planning permi	ssions 1 April to 31 Ju	ly 2024	

Page			Gypsy and Traveller Pitches	Travelling Showpeople Plots
		2024-29 Need (a)	81	8
		Planning permissions (b)	21*	-
		Site intensification (c)	44	8
		New site allocations (d)	32	-
		Total Supply (e)= (b+c+d)	97	8
		Surplus = (e)-(a)	16	0
		Years of supply 2024-29	5.99	5.0
ge 752		*Includes planning permission	ns 1 April 2024 to 12 Februa	ry 2025
Q (D)	In the interest of accuracy.	*Includes planning permission  Amend Table 4 to reflect update removal of Policy GT30 (White	ated planning permissions si	nce 31 July 2024 and the
754	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (White	ated planning permissions si	nce 31 July 2024 and the
75.7	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (White Table 4: 5 year supply from a Gypsy	ated planning permissions si stley Road) and correct error	nce 31 July 2024 and the in table:
7,7	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (White Table 4: 5 year supply from a Gypsy	ated planning permissions si stley Road) and correct error nticipated plan adoption date (2025)	nce 31 July 2024 and the in table:
7,7	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (Whise Table 4: 5 year supply from a Gypsy	ated planning permissions si stley Road) and correct error nticipated plan adoption date (2025) and Traveller Pitches Travelling Showpeople Pitches	nce 31 July 2024 and the in table:
7 7 7	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (White Table 4: 5 year supply from a Gypsy 2025-30 Need (a)	ated planning permissions si stley Road) and correct error nticipated plan adoption date (2025) and Traveller Pitches Plots	nce 31 July 2024 and the in table:
7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	In the interest of accuracy.	Amend Table 4 to reflect updaremoval of Policy GT30 (Whist Table 4: 5 year supply from a Gypsy 2025-30 Need (a) Planning permissions (b) Site intensification (c) New site allocations (d)	ated planning permissions sistley Road) and correct error nticipated plan adoption date (2025)  and Traveller Pitches Plots  86 8  17* -	nce 31 July 2024 and the in table:
7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	In the interest of accuracy.	Amend Table 4 to reflect update removal of Policy GT30 (Whist Table 4: 5 year supply from a Gypsy  2025-30 Need (a)  Planning permissions (b)  Site intensification (c)	ated planning permissions sistley Road) and correct error nticipated plan adoption date (2025)  and Traveller Pitches Plots  86 8  17* -	nce 31 July 2024 and the in table:
754	In the interest of accuracy.	Amend Table 4 to reflect updaremoval of Policy GT30 (Whist Table 4: 5 year supply from a Gypsy 2025-30 Need (a) Planning permissions (b) Site intensification (c) New site allocations (d)	ated planning permissions sistley Road) and correct error nticipated plan adoption date (2025)  and Traveller Pitches Plots  86 8  17* -  44 8 34 -	nce 31 July 2024 and the in table:

Pable 8: New Site Allocations (allanning definition)	To reflect the proposed deletion of an allocation and for accuracy.	2025-30 Need (a) Planning permissions (b) Site intensification (c) New site allocations (d)	Gypsy and Traveller Pitches  86  21*  44  32	Travelling Showpeople Plots 8 - 8
		Total Supply (e)= (b+c+d)	97	8
		Surplus = (e)-(a)	11	0
		Years of supply 2025-30	5.64	5.00
			ons 1 April 2024 to 12 February tley Road) and change total to 3 Site Name	
		Gyps <del>y</del> ies and Travellers		
		Policy GT24	Bushton North Farm, Bushton	3
		Policy GT25	Housecroft Farm 1	2
		Policy GT26	Housecroft Farm 2	2
		Policy GT27	Land at Cleverton, Cleverton	10
		Policy GT28	Oxhouse Farm, Rowde	10
		Policy GT29	Upper Seagry Farm, Upper Seagry	5
		Policy GT30	Whistley Road, Potterne	2
		Total		<del>3</del> 4 <u>32</u>

Table 5, Policy GT2 (Safeguarding gypsies and travellers, and travelling showpeople sites)	In the interest of accuracy.	Amend Table 5 to insert new sites permitted since 31 July 2024 as reflected in proposed changes to Table 3 and 4, consequential changes required to Appendix 2 (see Table 3):  • Dreamlea, Figure 29 • Land at Clay Pitts, Figure 32 • Clackhill Yard, Figure 59
Paragraph 4.6	To reflect the proposed deletion of an allocation.	Amend paragraph as follows to reflect the proposed deletion of Policy GT30 (Whistley Road):  In total, policies for the following site allocations are proposed to deliver 34-32 permanent pitches by 2029, consistent with the broad locational and site-specific criteria in Policy GT3 (New sites and intensification of existing sites).
Reblicy GT3 (New sites and tensification of existing sites)	In the interest of clarity and improve the effectiveness of policy.	Insert footnote at the end of policy requirement to refer to Strategy:  viii. Proposals should be accompanied by a drainage strategy that applies the surface water hierarchy and demonstrates the suitability of proposed foul drainage solutions [footnote]  [footnote] Wiltshire Council Drainage Betterment Strategy June 2024
Paragraph 4.15	In the interest of accuracy.	To correct the number of permitted pitches on the site:  Calcutt Park is an existing lawful gypsy and traveller site with 42 14 permitted pitches, situated outside Cricklade to the east of the A419. The GTAA identifies an on-site need for 1 pitch.
Paragraph 4.27 and new paragraph	In the interest of clarity and policy effectiveness.	To reflect requirements from the Environment Agency:  Amend Paragraph 4.27 to -  The site is located above a historic landfill site. Ground investigations are required in accordance with the Council's adopted Contaminated Land Supplementary Planning Document (December 2012) and the adopted Contaminated Land Strategy. If

		contamination is identified, a remediation scheme should be submitted with the planning application to identify the measures required to mitigate the risk from pollution.  Insert new paragraph after Paragraph 4.27 -  Proposals must be supported by a risk assessment in line with the Environment Agency's Land contamination risk management (LCRM). The Phase 1 Risk Assessment may encompass the requirements of the Council and the LCRM and findings acted on as necessary. Should intrusive site investigation be required following the initial Phase 1
Policy GT18 (Petersfinger Business Park)	In the interest of clarity and to improve effectiveness of policy.	Risk Assessment, it is essential that this is carried out with care and using appropriate techniques to ensure no new pathways are created or contamination mobilised.  To reflect requirements from the Environment Agency, insert new criteria:  Built development on site must be located outside Flood Zones 2 and 3.
Raragraph 4.96 and new paragraph ©	In the interest of clarity and policy effectiveness.	To reflect requirements from the Environment Agency:  Amend Paragraph 4.96 to -
757		The site sits above a historic landfill site. The original planning permission dates back to 2004 and subsequent permissions only relate to the increase in the number of caravans to be stationed on site. Ground investigations are required in accordance with the Council's adopted Contaminated Land Supplementary Planning Document (2012) and the adopted Contaminated Land Strategy. to consider the need for remediation measures.
		Proposals must be supported by a risk assessment in line with the Environment  Agency's Land contamination risk management (LCRM). The Phase 1 Risk Assessment may encompass the requirements of the Council and the LCRM and findings acted on as necessary. Should intrusive site investigation be required following the initial Phase 1 Risk Assessment, it is essential that this is carried out with care and using appropriate techniques to ensure no new pathways are created or contamination mobilised.

Policy GT24 (Bushton North Farm)	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend policy criteria as follows:
		i. Delivers a layout that demonstrates the most efficient use of land, and retains greenfield land within the site as far as practicable, and enables appropriate separation from the adjoining agricultural use.
		ii.: Improve the existing Provide new vehicular access with a 2.4m x 215m visibility splay, set back by 2.4m from the carriageway to ensure highway safety when accessing and egressing the site.
		vii.: Provide a new hedgerow <u>and secure cattle fence</u> along the open eastern <u>and southern boundaries</u> <del>boundary</del> of the site to mitigate the landscape impact of the development <u>and separate it from the adjoining agricultural use.</u>
Page 7		[Consequential amendment to site boundary shown on Figure 20, in the Annex to this document.]
Garagraphs 4.108 and 4.109	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend supporting text to support changes to Policy GT24:
		Amend second sentence of Paragraph 4.108 to -
		Access would be gained from Breach Lane using an existing gated field access which requires upgrading through a new vehicular access to serve the site including a culvert where it crosses the existing ditch along Breach Lane. The use of raised upstand kerbs at the site access point onto the highway should be avoided in this rural location to maintain the character of this rural road.
		Amend third sentence of Paragraph 4.109 to -
		Existing hedgerows and trees around the site must should be protected and enhanced, and a-new hedgerows will be required on the site's southern and eastern boundaries together with cattle fencing boundary to assimilate the development into the landscape and to achieve sufficient separation with the agricultural use and its access. Any loss of

		hedgerow necessary to achieve the new access should be compensated by the new hedgerow along the site perimeter.
Policy GT25 (Housecroft Farm 1)	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend policy criteria as follows:
		i. Delivers a layout that demonstrates the most efficient use of land, and retains greenfield land within the site as far as practicable, and enables appropriate separation from the adjoining agricultural use.
		v. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements creation.
Page		vi. Provide new characteristic native hedge field boundary to the north <u>and west together</u> <u>with secure cattle fence</u> , and provide new hedgerow trees on all boundaries, to minimise landscape impact from the development <u>and separate it from the adjoining agricultural use</u> .
je 759		vii. Secure the retention and protection of existing hedgerows on the east <u>ern</u> west and southern boundaries with a 10-metre wide habitat buffer, to minimise landscape impact from the development.
		[Consequential amendment to site boundary shown on Figure 21, in the Annex to this document.]
Paragraphs 4.112 and 4.113	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend supporting text to support changes to Policy GT25:
		Amend first sentence to paragraph 4.112 to -
		An existing field access can be utilised and improved. A new vehicular access is to be created. The use of raised upstand kerbs at the site access point onto the highway should be avoided in this rural location to maintain the character of this rural road.

		Amend first and second sentence of paragraph 4.113 to -  On-site features such as hedgerows must should be retained and protected through appropriate standoffs and avoidance of external lighting. New native hedgerow planting will be required around the site, to compensate for loss of hedgerow from access creation and to separate the development from the agricultural use and its access. The northern and western site boundaries must be secured with a cattle fence in the interest of safety.
Policy GT29 (Land at Upper Seagry Farm)  Page 760	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land and to address potential drainage issue limiting the number of pitches, amend the first sentence of Policy and three criteria as follows:  Land at Upper Seagry Farm, as shown on the Policies Map, is allocated for the development of no more than 5 gypsy and traveller pitches where it accords with policies in the development plan.  i. Delivers a layout that demonstrates the most efficient use of land, and retains greenfield land within the site as far as practicable, and enables appropriate separation from the adjoining agricultural use.  iii. Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access improvements creation.  vi. New hedgerow and tree planting along northern, southern and eastern boundaries, together with a secure cattle fence in the interest of safety.  [Consequential amendment to site boundary shown on Figure 25, in the Annex to this document.]
Paragraphs 4.134, 4.135 and 4.136	To improve effectiveness of policy.	To clarify the level of pitches that may be provided and to ensure there is no conflict between farming operations on the wider agricultural land, amend supporting text to support changes to Policy GT29:

	T	
		Amend second sentence to Paragraph 4.134 to -
		It is suitable for the allocation and development for <u>up to</u> 5 gypsy and traveller pitches in view of on-site drainage requirements.  Amend first sentence to Paragraph 4.135 to -
		7 thena more sentence to 1 aragraph 4.100 to
		A new vehicular access is to be created to serve the development with appropriate visibility. The use of raised upstand kerbs at the site access point onto the highway should be avoided in this location to maintain the character of this rural road. The site benefits from an existing field access and mMains connection for water and power could be achieved.
		Amend first sentence of Paragraph 4.136 to -
Page 761		On-site hedgerows and trees must-should be retained and protected through appropriate standoffs. New native hedgerow planting will be required along the northern, southern and eastern boundary, secured with a cattle fence in the interest of safety, to separate the development from the adjoining agricultural use and its access. Frontage hedgerow removal required for new vehicular access is to be compensated through replanting on an adjusted alignment.
Policy GT31 (Thickthorn Farm)	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend policy criteria as follows:
		i. Delivers a layout that demonstrates the most efficient use of land, and retains greenfield land within the site as far as practicable, and enables appropriate separation from the adjoining agricultural use.
		ii. Provide access visibility splays of 2.4m <u>x 200m</u> 15 (right) and 180m (left) to ensure highway safety when accessing and egressing the site.
		Insert new criteria: Provide new hedgerow along the new alignment to mitigate the loss of removal of hedgerows for vehicular access creation.
	1	

		iv. <u>Provide cattle fence</u> and additional hedgerows including hedgerow trees on the open western, eastern and southern site boundaries, and additional tree/copse planting in the northwestern field corner to mitigate landscape impacts from the development.
		[Consequential amendment to site boundary shown on Figure 27, in the Annex to this document.]
Paragraphs 4.145 and 4.146	To improve effectiveness of policy.	To ensure there is no conflict between farming operations on the wider agricultural land, amend supporting text to support changes to Policy GT31:
		Amend Paragraph 4.145 to -
Page 762		A new vehicular access <u>will be required for the development.</u> The use of raised upstand kerbs at the new site entrance should be avoided to retain the rural character of the <u>road.</u> Access improvements and a drainage strategy will be required. There is evidence of medium/high groundwater risk. Off-site watercourses could be utilised if acceptable. <u>A drainage strategy will be required</u> .
N N		Add to the end of Paragraph 4.146 -
		Frontage hedgerow removal required for new vehicular access is to be compensated through replanting on an adjusted alignment. Additional landscaping in the form of new hedgerows and hedgerow trees will be required around the site to provide separation from the agricultural use, and to assimilate the development into the landscape.  The western, southern and eastern site boundaries should be secured with a cattle fence in the interest of safety.
Chapter 5 Monitoring and Implementation Table 10	To reflect the proposed deletion of allocation	Remove reference to Policy GT30 (Whistley Road)

Table 3 Modifications to the Wiltshire Gypsies and Traveller Plan Pre-Submission Draft (Regulation 19) that relate to amendments to the Policies Map

Policy / Page / Paragraph reference	Reason for change	Change		
Figure 14: Policy GT18 (Petersfinger Business Park)	In the interest of accuracy	Correct site allocation boundary to reflect the extent of the area permitted for development to:  • Exclude the grassland between the permitted development and A36 • Reflect the permitted area pursuant to planning permission S/2010/1128 in the		
∰igure 31: Policy GT2 (Bridge	In the interest of accuracy	south-eastern part of the site  Revised figure shown in the Annex to this document.  Correct safeguarded site boundary to reflect the extent of the area permitted for gypsy and traveller sites.		
e 763	,	Revised figure shown in the Annex to this document.		
Appendix 2 - Changes to Policies Map - Safeguarded Sites	In the interest of accuracy	Include 'Dreamlea' in Figure 29 Include 'Land at Clay Pitts' in Figure 32		
		Insert new Figure 59 and site area for Clackhill Yard.  Revised figure and new figure shown in the Annex to this document.		
Appendix 2 - Changes to Policies Map - Safeguarded Sites Figure 50	In the interest of accuracy	Amend title of policies map and annotation, as follows:  Land at westside of B3092 Mapperton Hill/the Stables		
		Revised figure shown in the Annex to this document.		

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Appendix 2 - Changes to Policies Map - Safeguarded Sites Figure 54	In the interest of accuracy	Policies map to be amended to include correct areas of permitted development for Oak Tree Field and Petersfinger sites.  Revised figure shown in the Annex to this document.
Appendix 2 - Changes to Policies Map - Safeguarded Sites Figure 51	In the interest of accuracy	Policies map to be amended to include correct area of permitted development for Hatt Hill.  Revised figure shown in the Annex to this document.
Appendix 2 - Changes to Policies Map - Safeguarded Sites Gigure 31 O O	In the interest of accuracy	Policies map to be amended to include correct area of permitted development for Bridge Paddocks.  Revised figure shown in the Annex to this document.

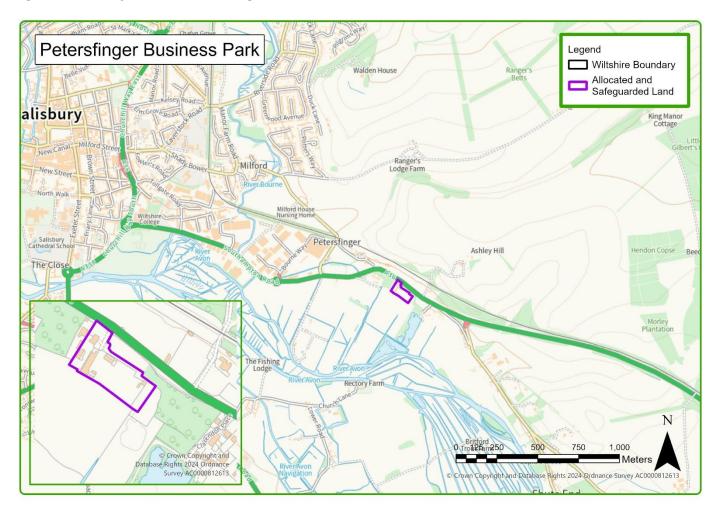
Table 4: Modifications to the Wiltshire Gypsies and Traveller Plan Pre-Submission Draft (Regulation 19) that relate to amendments considered to be minor in nature

Policy / Page / Paragraph reference	Reason for change	Change	
Whole Document	In the interest of accuracy	Renumbering of paragraphs, bullet points and policy numbers because of modifications proposed in Tables 1, 2 and 3.	
Pages, 6, 8, 9, 10, 14, 20 and 22.	In the interests of sourcing documents easily	To include the correct web-link to the 2024 Gypsy and Traveller Accommodation Assessment.	
Paragraph 3.19	In the interests of accuracy	Amend text to read: first % 5-year target	
நிgure 25 g o	In the interests of accuracy	Amend title of Figure: Policy GT29: Upper eagry Seagry Farm Site Allocation	
Onable 5	In the interests of accuracy	Amend figure reference for Land adjacent Bridge Paddocks (1) to 'Figure 31'  Amend figure reference for Land adjacent Bridge Paddocks (2) to 'Figure 31'	
		Amend figure reference for Land South of Bridge Paddocks to 'Figure 31'	

# **Annex**

This Annex contains the proposed amendments to figures as referred to in the Tables above.

Figure 14: Policy GT18 - Petersfinger Business Park Site Allocation



Bushton North Farm, Bushton Legend Allocated Land Tockenham Farm Breach Lane House Clyffe Pypard Wood Binall Rebbell Cottage Middlehill Parsona Farm Hou The Mermaid Bushton Bishop's Farm N Rosiers Farm Crown Copyright and Database Rights 2024 Ordnance Survey AC0000812613 112.5 225 675

Meters Crown Copyright and Database Rights 2024 Ordnance Survey AC0000812613

Figure 20: Policy GT24 - Bushton North Farm Site Allocation

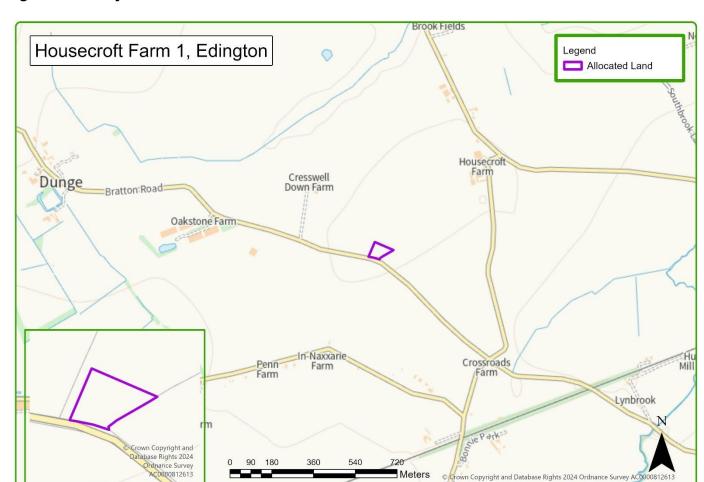


Figure 21: Policy GT25 - Housecroft Farm 1 Site Allocation

Croft Farm

Upper Seagry Farm, Upper Seagry

The Old Hall

Playing Field

Figure 1997 (1.58%)

**Upper Seagry** 

Seagry Church of England Primary School 0 37.5 75

150

225

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N

Figure 25: Policy GT29 - Upper Seagry Farm Site Allocation

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Thickthorn Farm, Preston

Legend
Lyncham Printy School
Lyncham Printy School
Preston

Preston

Preston

Inabelian Farm

Inabel

N

0 70 140

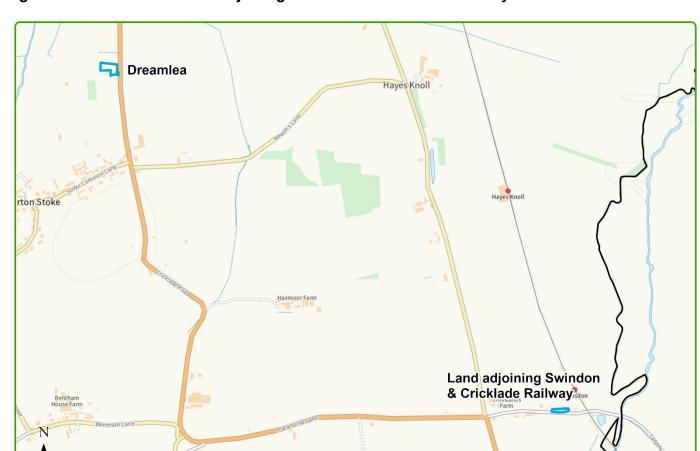
280

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420

Figure 27: Policy GT31 - Thickthorn Farm Site Allocation

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Figure 29: Dreamlea and Land adjoining Swindon and Cricklade Railway

0.2

0.3 0.4

Kilometers

0 0.050.1

That do Barn, Leigh

Bridge Paddocks

Land adjacent of Bridge Paddocks (2)

Land South of Bridge Paddocks

Bridge Paddocks (1)

Burnhll Farm

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Figure 31: Bridge Paddocks sites (x 4), and Thatado Farm

0.050.03 0

0.05

0.1

0.15

0.2

Kilometers

Hilldrop Farm Ashbed Copse Plain Farm Parley Copse Brickkiln Copse Bracebridge Lydiard Plain **Purdys Farm** Land at Clay Pitts Land at Four Oaks Webb's Wood Greatfield Purley Farm The Shepherds Rest Frith Copse Flaxlands Wood Flaxlands House Flaxlands Manor Farm Flaxlands Cottage Highgate Farm Cottage Farm The Bungalow The Paddock, Hook Midgehall Red Roses Hook Follywood Farm Ballard's Ash 0.1 Cottage 0.4 0.6 0.8 © Crown Copyright and Database Rights 2024 Ordnance Survey AC00008126 Kilometers

Figure 32: Purdys Farm, Land at Four Oaks, Land at Clay Pitts and The Paddock, Hook

Figure 50: Land at west side of B3092 (Mapperton Hill, Mere)/the Stables, and Land at Jane Oaks Farm (Mere)



Figure 51: Hatt Hill, Shaftesbury

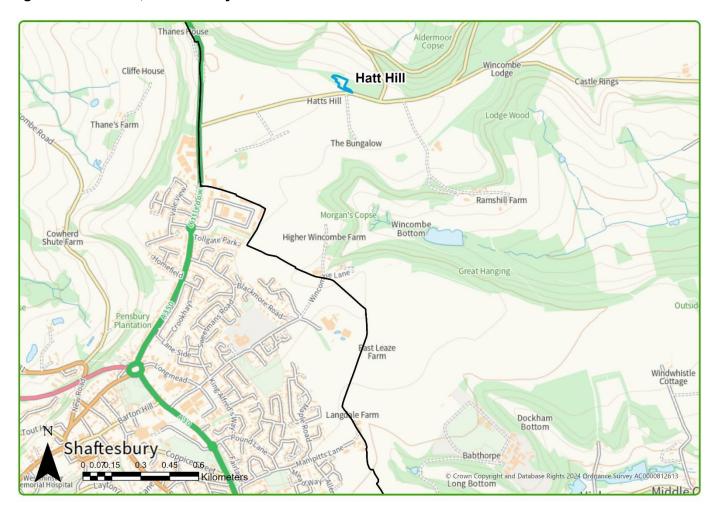


Figure 54: Salisbury Sites

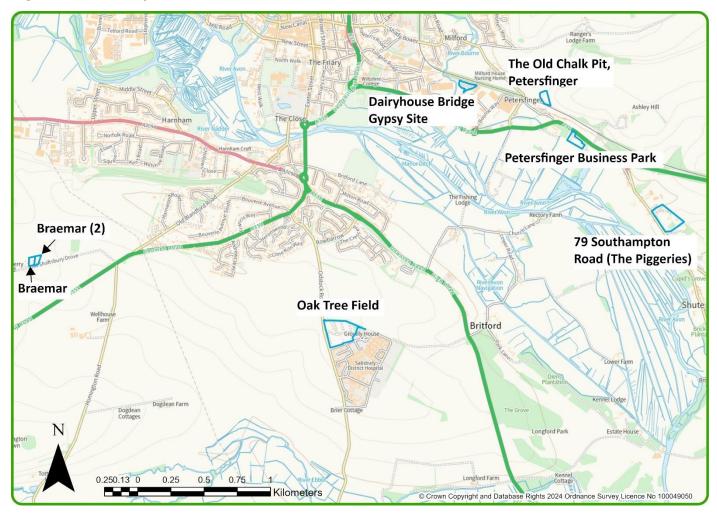
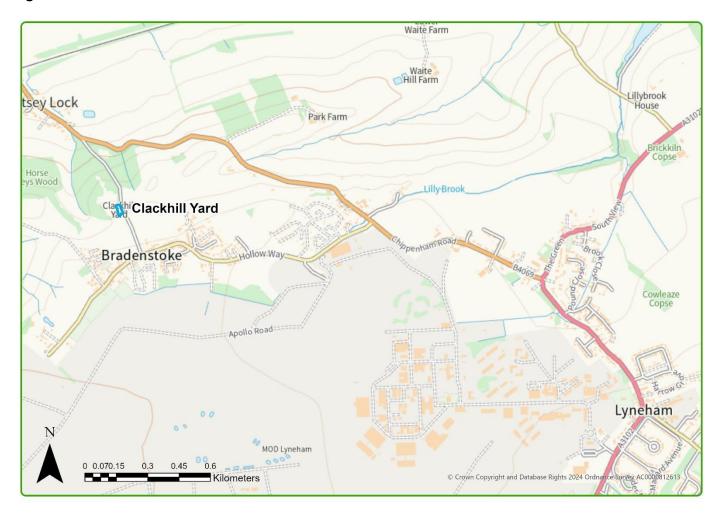


Figure 59: Clackhill Yard





# **EQUALITY IMPACT ASSESSMENT (EIA)**

(Please note, this will form part of a public facing document. If you have any questions about this, please contact <a href="Equality@wiltshire.gov.uk">Equality@wiltshire.gov.uk</a>)

Title: What are you completing an Equality Impact Assessment on?				
The Gypsies and Travellers Development Plan Document - Submission Draft				

Why are you completing the Equality Impact Assessment? (please tick any that apply)					
Proposed New Policy or Service	, , , , , , , , , , , , , , , , , , , ,		Service Review		
х	х				

Version Control				
Version control number	1.0	Date	02/08/2024	Draft reviewed and signed off by Spatial Planning Manager
	2.0	Date	22/11/2024	Updated following outcome of Regulation 19 public consultation

## Risk Rating Score (use Equalities Risk Matrix and guidance)

\*\*If any of these are 3 or above, an Impact Assessment **must** be completed. Please check with <a href="mailto:equality@wiltshire.gov.uk">equality@wiltshire.gov.uk</a> for advice

Criteria	Inherent risk score on proposal	Residual risk score after mitigating actions have been identified
Legal challenge	4	3
Financial costs/implications	2	1
People impact	4	3
Reputational damage	4	3



**Description** of what is being analysed

This EIA analyses the impacts of the proposed submission draft Gypsies & Traveller Development Plan Document ('the Plan') on persons protected by equality legislation. It also considers how the Plan could affect persons or groups not protected by equality legislation, including members of the settled community.

#### Section 2

People or communities that are currently targeted or could be affected by any change

- Romani Gypsies, Irish Travellers, English, Scottish and Welsh gypsies and Roadside Dwellers
- Travelling Showpeople
- Members of the settled community.

#### Section 3

People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

- The Strategic Planning Service
- The Estates & Development Service
- The Housing Operations Service
- Wiltshire Councillors
- Contractors appointed to deliver new emergency stopping sites.
- Opinion Research Services (ORS) contractors updating the Gypsy and Traveller Accommodation Assessment

#### Section 4

The underpinning evidence and data used for the analysis (Attach documents where appropriate)

## What are the issues that you or your partners or stakeholders already know about?

The main issues are summarised here, but more are identified under each 'protected characteristic' further below.

Nationally and locally, evidence demonstrates that members of the gypsy and traveller communities have significantly poorer health and education outcomes than the general population and experience substantial health inequalities. There is a stark difference in health inequalities both locally and nationally.

2021 census data shows that the traveller population in Wiltshire is younger than the non-traveller population, with fewer persons falling within the 50+ groups. This could indicate that travellers have more children but also that travellers die younger.

From the current Gypsy and Traveller Accommodation Assessment (GTAA), for the period 1 April 2024 to 31 March 2038, there is an identified accommodation need for 182 pitches for travellers that meet the 'planning definition' in Government policy which due to a High Court Judgement has now combined the previous 'definition' and 'non-definition' categories (Planning Policy for Traveller Sites (PPTS), 2023)) There is also a need for 12 showpeople plots.

It is recongised in the GTAA that there may be different approaches to meeting needs, rather than a full pitch required to support the accommodation needs of both teenagers and single adults and this is reflected in the policies developed for the Plan.

There are year-round unauthorised encampments in Wiltshire set up by transient travellers. While many of them can be managed where they are, the Council cannot direct groups to transit or stopping sites as the only transit site in the county was closed years ago. At least three stopping sites are needed in Wiltshire.

In terms of land use planning, without plan-led provision of pitches and plots, accommodation needs will persist. This means that households continue to double up on pitches, live on the roadside or on unauthorised sites, or may submit proposals on inappropriate sites that end up being refused and determined by the Planning Inspectorate on appeal.

# What data do you collect about your customers/staff?

#### Accommodation Needs

The Council commissioned Opinion Research Services (ORS) to undertake a Gypsy and Traveller Accommodation Assessments (GTAAs) in 2020, 2022 and 2023. In semi structured interviews, researchers attempted to gather data on demographic characteristics, current and future accommodation needs, whether there is over crowding or the presence of concealed households and travelling characteristics, what types of pitches they may require in the future or any features they may wish to be provided for on a new pitch or site. During the update to the evidence base for the June 2024 GTAA report, a total of 248 interviews or proxy interviews were completed with Gypsies and Travellers living on sites or roadsides in Wiltshire, 12 interviews with Travelling Showpeople and 14 Gypsy and Traveller households living in bricks and mortar.

As part of this survey ORS completed a desk-based review based on a range of secondary data, this included:

- Census data
- Traveller Caravan Count
- Records of unauthorised sites/ encampments
- Information on planning applications/ appeals
- Information on enforcement actions
- Existing Needs Assessments and other relevant local studies

- Existing national and local policy, guidance and best practice.

The 2024 GTAA confirms that in Wiltshire there are currently 3 public sites (50 pitches); 66 private sites with permanent planning permission (302 pitches); no private sites with temporary planning permission; 3 sites that are tolerated for planning purposes (4 pitches); 8 unauthorised sites (14 pitches); and 5 Travelling Showmen's yards (13 plots).

The study evidenced that for the period 1 April 2024 to 31 March 2038 there is an accommodation need of 182 pitches. This is made up of 11 households on unauthorised developments; 60 concealed or doubled-up households or single adults; 54 from a 5-year need from teenage children; 4 from in-migration/roadside; 6 from households living in bricks and mortar; and 47 from new household formation using a rate of 1.50% derived from local demographics. For travelling showpeople a need for 12 plots has been identified over the plan period, comprising: 8 from concealed households, 3 from teenagers, and 1 from future household formation.

There is a need for **37 pitches for undetermined households**. (27 pitches current need and 11 future need)

The report also recommends the allocation and delivery of at least 3 emergency stopping sites for transient travellers, so they can have access to safe temporary accommodation.

## Health and Education

Data presented in the Council's Gypsy, Roma Traveller and Boater Health Needs Assessment confirms that members of the community:

- Have lower uptake of immunisations and screening opportunities
- Have a 10-to-12-year lower life expectancy compared to the settled population
- Twice as likely to have caring responsibilities
- Higher risk of poor oral health
- Higher rates of miscarriage, lower average birth weight
- Lower levels of breastfeeding, higher maternal death rates
- More than double levels of smoking
- 25.9% of Traveller adults have depression vs 9.4% general population
- 42% adults have long-term health conditions<sup>1</sup>

Further to this, there is a crisis of male suicides in the gypsy and traveller communities however theses voices are largely missing from discussion, perhaps due to stigma surrounding mental health in the community.

In terms of education, the assessment confirms that gypsy and traveller communities have higher rates of absenteeism; significant reduction in attendance when transitioning from primary to secondary school education; substantially greater proportion of children requiring Special Education Needs support and requiring deprivation pupil premium; and have the lowest attainment of all ethnic groups throughout schooling.

The Wiltshire Traveller Strategy 2020-25 was prepared by the Council's Traveller Reference Group and refreshed the previous 2010 Traveller Strategy. The Strategy identifies 7 strategic priorities:

- Educational attainment and attendance
- Preventative services (primary, secondary and tertiary) including management of longterm conditions; screening; immunisations; pharmacy and dental services
- Safeguarding and violence prevention
- Mental health
- Maternal health and early years
- Social care and carer support

<sup>&</sup>lt;sup>1</sup> Wiltshire Gypsy, Roma, Traveller and Boater **Practice** 20**76** 2025 Version 2.0 21/11/2024

• Place and Community e.g. site safety, access to refuse points

Four cross cutting themes run through all these priorities:

- Increasing awareness of culture and health needs
- Improving multi-agency dialogue and information sharing to work towards reducing inequalities using current services and resources available
- Improved local data collation and analysis
- Facilitate engagement with traveller communities

## What local, regional and national research is there that you could use?

A range of non-exhaustive sources has been considered in this assessment, including:

### National:

- Equalities Act 2010
- Planning Policy for Traveller Sites (DLUHC 20232023)
- Review of housing needs for caravans and houseboats: draft guidance (MHCLG, March 2016)

### Regional:

A selection of neighbouring authorities' planning documents and equality impact assessments:

- Bath and North East Somerset Council Gypsy, Traveller and Travelling Showpeople Site Allocations Equality Impact Assessment
- Cotswold District Council Local Plan Equality Impact Assessment
- Dorset Council's Local Plan Draft Options Equality Impact Assessment

## Wiltshire:

- Wiltshire Council Business Plan 2022-32
- Wiltshire Core Strategy (adopted 2015), Core Policy 47
- Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025
- Health Needs Assessment of the Gypsy, Roma, Traveller and Boater population in Wiltshire (Wiltshire Council, 2019)
- Planning for Wiltshire's Gypsy and Traveller Communities Reg 18 Consultation Report (Wiltshire Council, 2021)
- Gypsies and Travellers Development Plan Document Sustainability Appraisal (incorporating SEA) Scoping report July 2024
- Gypsy and Traveller Accommodation Assessment (ORS, June 2024)

#### Protected characteristics

### 1. Age

Older travellers living on traveller sites have requirements that may differ from that of other travellers such as site access, access to facilities and next of kin. Generally, gypsies and travellers experience worse health than the rest of the population, are less likely to receive effective continuous health care and are more likely to die earlier<sup>2</sup>. Gypsies and travellers are less likely to be satisfied with access to a GP than white British people (60.7% compared to 73.8%<sup>3</sup>), likewise they are less likely to be satisfied with the service they receive (72.9% compared to 85.5%<sup>3</sup>). Gypsies and travellers have poor access to healthcare generally, with difficulty in registering with a GP and poor access to services as a result, something that becomes exacerbated in older age as more health issues arise. The health of a Traveller in their 60's is comparable to the health of someone in their 80's from the settled community.

(ethnicity-facts-figures.service.gov.uk) Page 783

<sup>&</sup>lt;sup>2</sup> Perspectives on ageing in Gypsy families | JRF

<sup>&</sup>lt;sup>3</sup> Satisfaction with access to GP services - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk) Patient experience of primary care: GP services - GOV.UK Ethnicity facts and figures

For elderly Gypsies and Travellers, the issue of mobility is particularly prominent as toilet and kitchen facilities often require them to walk outside. Provisions to alleviate issues surrounding this such as ramps or rails require a more permanent pitch so they can be installed.

Another issue that affects especially elderly Gypsies and Travellers is poor literacy and a general distrust of written documents. This is because they may have had little, if any formal education. This can affect their ability to engage with the planning system specifically, or public services generally, which often are document based. As such, specific consultation methods are required to engage with travellers. These may include face-to-face, video or audio calls.

Younger Gypsies and Travellers face issues of inequality with attainment at all key stages below national averages. Nationally, in the 2018 to 2019 school year, 19% of White Gypsy or Roma pupils and 26% of Irish Traveller pupils met the expected standard in key stage 2 reading, writing and maths, the lowest percentages of all ethnic groups. This continues in secondary education where White Gypsy or Roma pupils in state-funded schools had the lowest percentage among ethnic groups when it came to GCSE English and Maths<sup>4</sup>. Gypsies and Travellers can also experience discrimination within the schooling system through a lack of understanding and visibility or their histories and cultures, being negatively labelled, being treated differently and by racist and offensive language going unchallenged<sup>5</sup>.

Several issues surround child health of Gypsies and Travellers including higher infant mortality rate, lower birth weight, lower levels of breastfeeding, lower immunisation rates and higher rates of accidents. Mothers are 20 times more likely to experience the death of a child than mothers in the settled community. Issues common amongst Gypsies and Travellers that can increase health inequality can range from health service issues, discrimination, cultural and language barriers, health literacy and service user attributes<sup>6</sup>. Roadside encampments can especially affect children safety<sup>7</sup>.

## 2. Disability

Disabled Gypsies and Travellers face issues with discrimination in health services. Some have reported double discrimination of being both disabled and a gypsy or traveller when using mainstream disability services leaving them dependent on family members or neighbours.

#### 3. Gender re-assignment

There is no known evidence that could be considered here but this will be kept under review.

#### 4. Marriage and Civil Partnership

There is no known evidence that could be considered here but this will be kept under review.

## 5. Pregnancy and Maternity

In addition to the previously mentioned issues regarding Gypsy's and Traveller's access to healthcare there are further issues that can arise during pregnancy. Travellers will often not use the toilets in their trailers as this is considered unhygienic. Pregnant women may drink less water if they don't have access to facilities. At unauthorised encampments, local councils can authorise portaloos for women in the third trimester of their pregnancy however this is often denied due to issues accessing unauthorised encampments. Evictions from unauthorised sites can cause stress and uncertainty during pregnancy. Furthermore, frequently evicted women can have issues in being visited by midwives which can be exacerbated if there is a lack of cultural understanding<sup>8</sup>. Post birth, few women perceived themselves as requiring help from health professionals in infant feeding, as acceptable and accessible support was available from within

6

<sup>&</sup>lt;sup>4</sup> Gypsy, Roma and Irish Traveller ethnicity summary - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

<sup>&</sup>lt;sup>5</sup> Bullied, Not Believed and Blamed: The Experiences of Gypsy, Roma and Traveller Pupils. Recommendations for Schools and Other Settings. Anti-Bullying Alliance and Friends, Families and Travellers, 2020

<sup>&</sup>lt;sup>6</sup> https://www.themj.co.uk/We-need-to-reach-out-to-disabled-people-in-Gypsy-Roma-and-Traveller-communities/219417

<sup>&</sup>lt;sup>7</sup> Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health: A report by the Traveller Movement: principal authors Margaret Greenfields and Matthew Brindley

<sup>8</sup> https://www.aims.org.uk/journal/item/experier p-pregnance art-communities Version 2.0 21/11/2024

their own communities. Roma mothers described a tradition of breast-feeding and appropriately timed weaning, while English Gypsies and Irish Travellers customarily may be more likely to feed using infant formula. When mothers requested support, health service provision was often found inadequate<sup>9</sup>.

## 6. Race

Under the Equality Act 2010, English, Welsh and Scottish Gypsy Travellers, Irish Travellers and Romany Gypsies and Roma people are recognised as ethnic groups protected against discrimination. Showpeople and New (New Age) Travellers are not recognised within these definitions and may not be protected.

As mentioned previously, Gypsies and Travellers often experience discrimination within the educational system, and this trend continues post education for example in employment<sup>10</sup>. Other issues surrounding the ways that Gypsies and Travellers are discriminated are mentioned in the age protected characteristic section of this document.

# 7. Religion or belief

Many Irish Travellers are practicing Catholics, while some Gypsies and Travellers are part of a growing Christian Evangelical movement<sup>11</sup>. The availability and location of permanent sites may have an impact on ability to practice.

#### 8. Sex/sexual orientation

There is no known evidence that could be considered here but this will be kept under review.

## 9. Needs of people living in rural areas (travellers/non-travellers)

There are several issues that affect those living in rural communities; changing population patterns are leading to outward migration of young people and inward migration of older people leading to an increasingly older rural population with accompanying health needs. Infrastructure including public transport links has a significant impact on daily living costs and access to services. The digital gap between urban and rural areas is also ever-increasing reducing opportunities to jobs that are increasingly available to be worked remotely like banking or health related services. Access to health services is another issue faced; rural areas have worse access in terms of distance to health, public health and care services. Longer distances to GPs, dentists and hospitals. Furthermore, rural areas are smaller with potential for less community support that can lead to social isolation and impact on mental wellbeing. Likewise, house prices in rural areas are higher and there is a much higher proportion of 'non-decent' homes with lower levels of energy efficiency and even areas that are not on the gas grid that can lead to higher prices and lead to fuel poverty 12. There can be land uses issues for Gypsies and Travellers that look to purchase land in urban areas, but this also applies to non-traveller communities. There is a scarcity of land in and around urban areas because it is held back in anticipation of housing development<sup>13</sup>. Whereas there are other reasons such as a degree of separation, this also has an influence on why travellers seek to establish a lawful settled base in rural locations.

The planning system does not prohibit nomadic traveller sites in open countryside outside urban and rural settlements (PPTS, 2023), subject to planning consent. This can lead to frustrations amongst the settled community when housing applications are refused due to their location in the open countryside.

# 10. Needs of People who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area (travellers/non-travellers)

Those of a lower socio-economic background can face issues such as parental time investment, children's wellbeing and behaviour, lower participation in sport and cultural activities and lower

<sup>9</sup> https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5060882/

<sup>&</sup>lt;sup>10</sup> Ryder, A. and Cemlyn, S. (2014) Civil Society Monitoring on the Implementation of the National Roma Integration Strategy in the United Kingdom in 2012 and 2013.

<sup>11</sup> Gypsy Roma and Traveller History and Culture | The Traveller Movement

<sup>&</sup>lt;sup>12</sup> Health and wellbeing in rural areas, Local Government Association, 2017

<sup>13 &</sup>lt;u>Historical Laws affecting Gypsies and Travellers - Figure Fardies and Travellers (gypsy-traveller.org)</u>
Version 2.0 21/11/2024

engagement with schools. This can limit educational and career opportunities from an early age<sup>14</sup>.

# 11. How do your Governance documents (Terms of Reference, operating procedures) reflect the need to consider the Public Sector Equality Duty (PSED)?

Wiltshire Council must adhere to the PSED and publish information to show compliance with the Equality Duty, namely that it had regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations between people who share a protected characteristic and people who do not share it<sup>15</sup>

In this instance, the emerging Plan and its evidence must include information to show that the Council as local planning authority consciously thought about the three aims of the Equality Duty as part of the process of plan making. It relates especially to information about people who are affected by the Plan's policies who share protected characteristics.

The draft Plan was first published as part of the Cabinet agenda on 5 July 2024. Some of its supporting evidence is already in the public domain, most importantly the Consultation Document on the intention to prepare a Plan under Regulation 18 of the Town and Country Planning Regulations; the 2024 GTAA; and the Sustainability Appraisal Scoping Report May 2021.

The Council's published Regulation 18 Consultation Document already confirmed that the draft Plan will plan for the accommodation needs of persons that do not meet the planning definition which is now part of the Planning Policy for Traveller Sites (2023) planning definition.

The 2022 GTAA report summarises the results of stakeholder consultation and notes at para 5.17 that "Wiltshire will continue to ensure that services are fit for purpose in regard to tackling inequality. This includes considering issues of literacy to ensure that there are alternative formats to support Gypsies & Travellers to access any of the services Wiltshire have, while also continuing with the work that has already been undertaken by the local authority to tackle stigma and prejudice of the Traveller community. The work aims to allow council staff and councillors to understand more about the cultures and traditions of Gypsies & Travellers, and to understand the contribution they make to the community."

The Sustainability Appraisal Scoping Report (May 202)1 highlights the national and local evidence on health inequality and discrimination that affect gypsies and travellers. Also, Appendix A lists the Equality Act 2010 as a source that informs the draft Plan, and it is noted that "Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Equalities Act 2010 contains specific legislation that relates to the elimination of discrimination, harassment, victimisation and the advancement of equal opportunities. This should be considered when developing policies in the Gypsies and Travellers Plan."

This Equality Impact Assessment will be updated through the plan consultation, examination and adoption process to ensure that it reflects the most up to date information available.

12. What engagement, involvement and consultation work have you done? How was this carried out, with whom? Whose voices are missing? What does this tell you about potential take-up and satisfaction with existing services?

Between 13<sup>th</sup> January 2021 and 9<sup>th</sup> March 2021 the Council consulted on the intention to develop the Gypsies and Travellers Development Plan Document under Regulation 18 of the Town and

15 HM Government - Equality Office: Equality Act 2010: Specific Duties to Support the Equality Duty – What Do I Need to Know? A Quick Start Guide for Public Sector Opacisation 86 Version 2.0 21/11/2024

<sup>&</sup>lt;sup>14</sup> Socio-economic influences on children's life chances - GOV.UK (www.gov.uk)

Country Planning Regulations. Because of the 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 full consultation report is available on the Council's website.

The following organisations, groups and individuals were notified of the consultation and invited to comment:

- Specific consultation bodies (including the 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

The various consultation methods are shown below:

- Notification emails sent to Spatial Planning mailing list (circa 1500 recipients on mailing list)
- Inclusion within Wiltshire Council email newsletter sent to residents
- Inclusion within Wiltshire Council email newsletter sent to two stakeholder mailing lists
- Inclusion within newsletter sent to Wiltshire Council members
- Inclusion within newsletter sent to Wiltshire town and parish councils
- Social media (reach 764,775)
- Public Notice Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.
- A series of press releases
- Spatial Planning online events The consultation on the Gypsies and Travellers DPD
  was also advertised during 17 online consultation events in 2021 for the draft Wiltshire
  Local Plan Review, that were attended by 1,321.

The consultation documents were made available on the Wiltshire Council website with respondents able to respond via post, email or Microsoft forms. Arrangements were also put in place for those who did not have access to the internet with hard copies sent to them by post.

To encourage participation by travellers, 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 via the consultation website. The council employed Opinion Research Services (ORS), the consultancy that undertook the Gypsy and Traveller Accommodation Assessments (June 2020 and March 2022) to receive consultation responses on behalf of the council. The Council offered the telephone form of response to the consultation as it is a more personal way of communicating and acknowledges the importance of spoken word in traveller communities.

These telephone conversations were informal, meaning that general planning matters and other issues could be raised and discussed with officers and ORS to allow for effective engagement. In addition to this the Council sought to engage with travellers on unauthorised encampments through its Highway Enforcement Officers during the consultation period to understand their views of emergency stopping sites proposed in the consultation document.

Engagement was also made with 168 households in Wiltshire that identified as either Gypsies or Travellers in the 2021 Census to give the opportunity for those living in bricks and mortar to make their views known.

Overall, 45 representations were received from the general consultation in addition to 20 travellers who responded by telephone.

The GTAA is a method of consulting traveller communities and provided information from travellers on issues such as pitch requirements and facilities that may be needed in the future.

Potential voices missing for example are those who do not want to engage on the proposed plan. Travellers often have reservations about engagement with the Council due to distrust and association with enforcement, evictions and a hostile planning system. The new DPD could help with overcoming those issues as it plans for traveller's land use needs.

The first consultation did not include proposals for site allocations. It is expected that the next consultation will generate more interest and feedback because it will include site proposals.

The Council has an active Traveller Reference Group bringing together Council services and some external stakeholders to improve knowledge sharing and targeting services to travellers. As described before, the group produced the 2020-25 Traveller Strategy, and the DPD might assist in delivering some of the aspirations in the 'People and Places' area.

Between 20<sup>th</sup> August 2024 and 4<sup>th</sup> October 2024, the council consulted on the Gypsies and Traveller Development Plan Pre-Submission Draft under Regulation 19 of the Town and Country Planning Regulations. This draft proposed policies on site selection and development criteria as well as site intensification and new site allocations following on from the outcome of the Regulation 18 consultation on the principles of the Plan.

In accordance with the Statement of Community Involvement and the legislative criteria governing the regulatory stages of plan making, notifications were sent inviting comments on the draft Gypsies and Travellers Development Plan Document that included the following organisations, groups and individuals being contacted:

- Specific consultation bodies (including Environment Agency
- Natural England
- Historic England
- NHS
- Highways England) Neighbouring local authorities
- All parish and town councils
- Wiltshire Councillors
- Individuals
- community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy and the Wiltshire Gypsies and Travellers Development Plan Document.

Consultees were made aware or formally notified of the consultation through a variety of means as outlined below:

- Notification emails and letters sent to those on the mailing list (over 7000 recipients)
- Notification letter and easy read leaflet sent to Gypsies and Traveller and Travelling Showpeople (over 400 recipients)
- Wiltshire Council email newsletter sent to residents
- Email newsletter sent to Witlshrie Council members (over 100 recipients)
- Social media posts 21 in total facilitated 783 clicks to the consultation webpage and had a reach 47,300
- Public notices were placed within local newspapers
- Press releases

As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge). The following documents: the draft Gypsies and Travellers Development Plan Document, draft Sustainability Appraisal Report, draft Habitats Regulations Assessment and Evidence base reports were made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury. Electronic access to all submission documents was

available at all Wiltshire Council libraries. 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.

A statement of representations procedure (guidance note) explaining how to comment was produced for the consultation and could be viewed both online [available here to download] and in hard copy format at the locations referred to above. The statement of representation procedure also set out information including what the local plan was about, the period for submitting representations, the availability of documents, explanation as to the tests of soundness and how to submit comments. The representation form (produced broadly following the format recommended in the Planning Inspectorate's procedural guidance on local plan examinations) was attached as an appendix to this guidance document whilst also being made available on the consultation website alongside hard copies being available alongside the consultation material at deposit points.

Respondents were able to respond to the consultation via post, email or via the Council's consultation portal. The consultation portal enabled people to view the plan electronically, both via mobile and computer, and comment directly on the part(s) of the plan they wished to comment on. Instructions on how to use the consultation portal were provided on the consultation webpage [available to view here]. The consultation was also supported by an interactive version of the Plan created using ArcGIS StoryMaps [available to view here]. This enabled people to view the plan alongside an interactive policy map. By navigating to a part of the plan (e.g., site allocation) users were able to view proposals in detail to understand the exact extent and location of, for instance, site allocations and proposals around a specific place.

As part of the consultation there were 5 drop-in events at libraries and leisure centres across the county. At each event there were a series of display boards to inform attendees about the Gypsies and Travellers Development Plan Document and how to comment alongside copies of the proposed submission documents and several officers present to inform attendees about the consultation and answer any questions. A live webinar was also held on 3 September 2024, a recording of which was made available on the Council's website and YouTube channel for those who may wish to view it back.

To increase engagement within the Gypsy and Traveller community where literacy levels are generally lower than the settled community, the council appointed Opinion Research Services (ORS) to provide site visits to the sites allocated for intensification and to provide a contact service via telephone or email for any queries. ORS visited all 18 of those sites three times and made contact with most site owners. Some site owners then submitted representations online themselves or were supported by ORS to complete the paper form and this was posted back to the council by ORS.

A number of responses were received in relation to the consultation. Overall 658 comments were received from 448 submissions. All the comments can be viewed verbatim within the Council's consultation portal. Within the consultation portal all representations can be viewed against the part of the Gypsies and Travellers Development Plan Document to which they relate whilst also being viewable based on who submitted comments.

One petition was received as part of the consultation. Policy GT30: Land at Whistley Road, Potterne, with 487 signatures.

# 13. Have you considered the Armed Forces Covenant in your consultation and research?

The Armed Forces Covenant provides protection to those who have served in the Naval Service, the Army and the Royal Air Force. It states that they should face no disadvantage to other citizens in the provision of public and commercial services with special provision sometimes given to those who have been either injured or bereaved.

It is considered that the Covenant does not bear relevance in the preparation of this Plan, but this will be kept under review as the document progresses.

# 14. Have you considered impacts on those living in rural areas? Government guidance is available.

Some of the issues that impact those living in rural areas is covered in section 9 of this document. The Government's Rural Proofing Guidance document provides information on how to rural proof policies. This starts with the identification of the impacts of the policy in rural areas, followed by an assessment of the scale of impacts. It is then recommended that consideration of how to tailor the policy for rural areas is reviewed before evaluation and adaptation of the policy is undertaken<sup>16</sup>.

The Rural Proofing Guidance has been considered during the drafting of the Plan.

## 15. Refer to the family test

The family test helps ensure impacts on families and relationships functioning is recognised in the process of policy development. Evidence shows that family relationships have a major impact on the life chances of individual from all backgrounds and circumstances. The family test consists of 5 questions as follows:

- 1. What kinds of impact might the policy have on family formation?
- 2. What kind of impact will the policy have on families going through key transitions such as becoming parents, getting married, fostering or adopting, bereavement, redundancy, new caring responsibilities or the onset of a long-term health condition?
- 3. What impacts will the policy have on all family members' ability to play a full role in family life, including with respect to parenting and other caring responsibilities?
- 4. How does the policy impact families before, during and after couple separation?
- 5. How does the policy impact those families most at risk of deterioration of relationship quality and breakdown?

When considering how this can impact on Gypsies and Travellers this is particularly important as family ties are often very strong<sup>17</sup>. As more pitches are being proposed the intensification of sites is likely to mean that more families can stay together. New land allocations are also being considered. In addition to this the increase in number of sites can reduce the impact of unauthorised encampments which can lead to reduced health impacts and more family stability through more security of pitches.

The family test has been applied to test the proposed Plan, especially in meeting traveller accommodation needs.

#### Section 5

Conclusions drawn about the impact of the proposed change or new service/policy

The council has sought to develop a draft Gypsies and Traveller Development Plan that provides fair and equal treatment for Travellers by supporting the needs of their way of life, whilst respecting the interests of the settled community, through the identification of suitable sites to meet the identified need and setting out how individual proposals for Traveller sites will be considered.

The impact the adoption of the Plan will:

- Provide additional accommodation capacity for Gypsies and Travellers and Travelling Showpeople in a planned way with access to nearby facilities e.g. education, GPs and dentists.
- Enable better quality housing and future expansion on sites for family groups

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<sup>&</sup>lt;sup>16</sup> Rural proofing – Practical guidance to assess impacts of policies on rural areas – March 2017

<sup>&</sup>lt;sup>17</sup> The Family Test - GOV.UK (www.gov.uk) Version 2.0 21/11/2024 Page 790

- Safeguard existing and new sites from change of use to ensure that sites remain part of the Gypsy and Traveller site supply into the future
- Fewer unauthorised encampments with the county
- Provide an increase in the availability of emergency stopping sites with the provision of basic facilities near the main road networks to ensure there are approved places to stop

Actions to take because of this equality analysis are:

- Ensure that the methods of consultation and communication undertaken during Regulation 19 stage are reviewed to information future engagement on the Plan or similar plans
- Continue to review the site allocations and policies to ensure the identified actions outlined in the action plan are monitored and delivered effectively
- Continue to review this EIA periodically to ensure it remains relevant and up to date.

#### Section 6

How will the outcomes from this equality analysis be monitored, reviewed and communicated?

The Gypsy and Traveller Development Plan Document will be reviewed 5 years after adoption. There will be a lag between adoption and accommodation provision coming into use but by that first review period it would be anticipated that the impact could be monitored by looking at:

- Planning application reference
- Registration date
- Site address
- Description of development
- Pitches or plots proposed to be gained
- Pitches or plots proposed to be lost
- Number of static caravans to be provided
- Number of mobile caravans to be provided
- Number of touring caravans to be provided
- Categorisation: gypsy and travellers / showpeople site; meets or does not meet PPTS Annex 1 definition; allocation; intensification; windfall
- Planning application / planning appeal status and decision date
- Length of permission permanent or temporary
- Conditions of permission (e.g. personal, no. of caravans/pitches)
- Completion date

Wider impact will be linked back to the Wiltshire Traveller Strategy 2020-25 (and its successor plans) overseen by the Traveller Reference Group

*Copy and paste sections 5 & 6 into any Committee, CLT or Briefing papers as a way of summarisng the equality impacts where indicated				
Completed by:	Jo Hobbs			
Date	21/11/2024			
Signed off by:	Geoff Winslow			
Date	10/01/2025			
To be reviewed by:	Sharon Waring			
Review date:	21/05/2025			

Identified issue drawn from your conclusions (only use those characteristics that are relevant)	Actions needed	Who is responsible	Date	Expected outcome/Outcome
Age	•	•		
1. Proximity to access health services 2. Mobility of elderly residents at a non- permanent site 3. Poor literacy	11. Sites are a reasonable distance to access to services including GP and schools.	Strategic Planning	September 2025	Sites, including future sites from years 6 onwards are selected in line with the criteria-based policies set out the plan enabling access to healthcare and education services
	2. A permanent site will ensure adaptions to access facilities on site.	Applicant developing site	Ongoing	Sites will be suitably developed through planning policy to enable a good standard of living
Page 792	3. Alternative formats for the draft consultation and access to information will be designed.	External Communications	Complete	Outcome – easy read leaflet sent to all pitches and plots in Wiltshire
	4. Procurement of additional support during the consultation period to raise community engagement	Strategic Planning	Complete	Outcome – Opinion Research Services (ORS) commissioned to provide additional support through site visits, telephone and via email
Disability				
.Proximity to access health services	Sites are a reasonable distance to access services including GP and schools.		2025	Sites, including future sites from years 6 onwards are selected in line with the criteria-based policies set out the plan enabling access to healthcare and education services
Gender Reassignment	I	I		
lo known evidence	To remain under review.			
Marriage and Civil Partnership	1	1		1
lo known evidence	To remain under review.			

Access to sanitation and adequate standard of living	Site specific criteria for existing sites and policies for new temporary and permanent sites will enable access to appropriate facilities on site	Strategic Planning	September 2025	Acceptable standard of living on existing and new sites
Race (including ethnicity or national origin, co	lour, nationality and Gypsies and Trave	llers)		
Discrimination and access to education and employment opportunities	Sites are a reasonable distance to access services such as schools.	Strategic Planning	September 2025	Sites, including future sites from years 6 onwards are selected in line with the criteria-based policies set out the plan enabling access to healthcare and education services
	2. Dedicated web pages on the council site have all necessary information for school application, home schooling and access to the Travelling Education service.	Schools Admissions/Targeted Education	Ongoing Review	Gypsies and Travellers are enabled to access education through the same processes as the settled community
2.Access to appropriate accommodation  O  O  O  O  O  O  O  O  O  O  O  O  O	31. Ensuring the monitoring and review of the implementation of the plan contains clear objectives and measures to ensure accommodation provision is developed to meet an identified need	Strategic Planning	Ongoing Review	Gypsies and Travellers with an identified need within the plan are able to access appropriate accommodation provision
3.Improvement in key outcomes for the Gypsy and Traveller community	Ensuring effective measures are in place to monitor key health and wellbeing indicators that can demonstrate the impact of providing appropriate accommodation to meet identified needs	Public Health	Ongoing Review	The Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025 and any future revised versions contains measures to assess the impact on key outcomes for the Gypsy and Traveller community
Religion and Belief			<u> </u>	II.
No known evidence	To remain under review			
Sex	1	l	ı	11
No known evidence	To remain under review.			
Sexual Orientation			<b>-</b>	

No known evidence	To remain under review.			
Other (including caring responsibilities, rurality,	, low income, Military Status etc). Refe	rto family test: https://rese	earchbriefings	s.files.parliament.uk/documents/CBP-7714/CBP-
<u>7714.pdf</u>				
1.Proximity to health service				
2.Access to digital opportunities				
3. Social Isolation				
4. Proximity to education and local sport and c	ultural facilities			

Wiltshire Council
Full Council
25 February 2025

# Notice of Motion No. 2025-01 Action against the removal of Labour's "Family Farm Tax" From Cllr Rich Rogers and Cllr Bill Parks

#### **Preamble**

Wiltshire is a largely rural county with agriculture at its very heart. Over the last thousand years, our city, towns, villages and hamlets have been created around the farming of land and the trade of goods grown and grazed on our green fields. Today, much of Wiltshire is still farmed in order to provide food and other produce for people in the UK and across the World. Many of Wiltshire's farms have been handed down from generation to generation and still bear the same family name as they did hundreds of years ago. Wiltshire farmers led the way in boosting food production during the Second World War and the tradition of innovation continues with our agricultural college in Wiltshire. As a Council we have focused on supporting local producers through the recently launched Wiltshire Marque and are carrying out innovative projects to support the health of farmers through outreach work, initially through the Salisbury Livestock Market.

This Labour Government has decided to attack the very heart of Wiltshire through additional taxation of our farming communities.

The recent Labour budget includes a restriction on Agricultural Property Relief which until now has allowed Wiltshire farmers to hand the reins to their sons and daughters, Wiltshire's next generation of farmers. We Conservatives recognise the hard work of Wiltshire's farmers to put food on our tables. Taking on the family farm is not a commercial decision fuelled by the promise of huge profits, quite the opposite. We appreciate the incredibly tight margins our farmers contend with and recognise that farming is a way of life for many families here in Wiltshire. Taxation on the inheritance of agricultural land will spell the end for many farms. Wiltshire's farming families will have no choice but to sell the land which has been in their family for generations to pay Labour's tax bill.

The Government's attack on Wiltshire's farming heritage will destroy livelihoods, damage communities and decimate this country's food security.

#### **Motion**

We ask for two actions as a result of Labour's changes to inheritance tax rules concerning agricultural land:

- 1) That Richard Clewer, the Leader of Wiltshire Council, writes to the Chancellor of the Exchequer, the Secretary of State for Environment, Food and Rural Affairs, and our Wiltshire MPs, in order to outline Wiltshire Council's dismay at the decision in the Budget to restrict Agricultural Property Relief, and to request the Government puts an immediate stop to the Family Farm Tax.
- 2) That the council undertakes an analysis of how many of Wiltshire's farms would be affected by the changes in national policy announced in the recent budget and reports this back to members.

**Full Council** 

**25 February 2025** 

#### Notice of Motion No. 2025-02

# Restoration of Councillor's Right to Ask Unnotified Questions at the Beginning of Cabinet Meetings

#### From Cllr Jon Hubbard and Cllr Ian Thorn

This Council notes that, in previous years, elected members had the right to ask questions at the beginning of Cabinet meetings without the need to give prior notice. This right allowed for more dynamic and responsive debate, enabling Councillors to raise urgent issues, hold the Cabinet to account effectively, and engage directly with key decision-makers on matters of local concern, regardless of whether those issues were on the formal agenda for the meeting.

However, this right was removed in a previous decision due to concerns regarding the number of questions some councillors were asking, which led to lengthy discussions and delays during meetings.

In light of this, and recognizing the importance of upholding democratic principles and effective scrutiny, this Council proposes the following:

# 1) Restoration of the Right to Ask Questions at the Beginning of Cabinet Meetings:

Elected members will once again have the ability to ask questions at the beginning of Cabinet meetings without the need to give prior notice. These questions will not need to be related to any of the items on the formal agenda for the meeting, ensuring that members can raise issues of public concern or matters that arise unexpectedly.

#### 2) Limiting the Number of Questions:

To address previous concerns regarding the excessive number of questions, it is proposed that the number of questions each councillor may ask at the beginning of each Cabinet meeting will be limited to a maximum of three questions per member. This limitation will ensure that questions remain focused and manageable while still allowing for meaningful scrutiny.

#### 3) Review Mechanism:

The Council agrees that a review of this approach will take place after <u>12 months</u> to assess its impact and ensure that it continues to strike the right balance between open democratic scrutiny and the efficiency of Cabinet meetings.

This motion aims to restore the ability of elected members to carry out their duties with greater responsiveness and accountability, while also ensuring that meetings remain focused and productive.



### Agenda Item 15

Wiltshire Council

**Full Council** 

**25 February 2025** 

#### Notice of Motion No. 2025-03

### Motion to amend appointment of Portfolio Holders to be approved by Full Council

#### From Cllr Edward Kirk and Cllr Mike Sankey

Motion to amend the appointment of Portfolio Holders Part 3C Para 5.1 of the Constitution from:

"The Leader may also appoint other Members as 'Portfolio Holders' to assist Cabinet Members with the oversight, policy development and management of their areas of responsibilities."

To:

"The Leader may also appoint other Members as 'Portfolio Holders' to assist Cabinet Members with the oversight, policy development and management of their areas of responsibilities, subject to the requirement being approved by Full Council."



Wiltshire Council
Full Council
25 February 2025

#### Notice of Motion No. 2025-04

#### **Existing Employment Sites**

#### From Cllr Philip Whitehead and Cllr Simon Jacobs

#### **Preamble**

Wiltshire Core Strategy was adopted in January 2015. Although this Core Strategy is now aged it is still used by officers to determine planning applications. This Core Strategy includes the protection and delivery of a thriving economy and protection and enhancement of existing employment in Wiltshire.

We have seen developers argue that the Wiltshire Core Strategy does not specifically protect viable businesses in rural area and consequently I want to repeat and strengthen that support for rural businesses by Wiltshire Council.

This aligns with the NPPF Policy 88, (Supporting a prosperous rural economy) and Policy 98 (Providing social, recreation and cultural facilities and services the community needs)

This protection is essential where we have existing, successful and viable local businesses within our towns and villages employing local people and giving future opportunity to local children. In addition, many of our local businesses provide essential services to our rural communities that would not otherwise be available.

It is worth noting that our emerging Wiltshire Local Plan (Policy 65) strengthens this protection for all employment areas and therefore this interpretation is in line with our emerging Local Plan which has already been supported by this Council.

#### Motion

Wiltshire Council hereby wishes to express its strong support for the retention of viable and sustainable businesses in rural settlements, recognising the vital contribution that these businesses make to residents' lives and to the Wiltshire economy, as required by Policy 65 (Existing Employment Land) of the emerging Wiltshire Local Plan, which has been submitted to the Planning Inspectorate for examination this year, and existing National Planning Policy Framework paragraphs 88 and 98.



**Full Council** 

#### **25 February 2025**

## Announcement from Cabinet and Committees Update from Corporate Parenting Panel

On 17 October 2023, Full Council committed to the Corporate Parenting Panel exploring care experience as a protected characteristic. Corporate Parenting Panel were delegated to explore the matter to ensure it was something that young people would want, and that there would be no unintended consequences.

A paper exploring the above was presented at Corporate Parenting Panel on 28 January 2025. As a local authority whose Children's social services are rated 'Outstanding' by OFSTED, who recognised that "Care leavers are supported exceptionally well by caring and compassionate personal advisors who are determined in their efforts to provide the right support to help them achieve their ambitions", the Council seeks to continually deliver the highest quality services to its care experienced young people. This is reflected in the strong existing Local Offer for all our care experienced young people, supported by consistent Corporate Parenting support and our One Council approach.

Young people themselves have told us that they do not want to be identified and worry that being characterised as care experienced may not let them forget and move on and some have raised concerns that organisations may automatically 'flag' care experienced people to help identify safeguarding concerns without the knowledge of those young people.

The paper evidenced that the tangible impact of recommending this in Wiltshire is not clear given the strong offer currently in place for our care experienced young people due to our existing and ambitious commitment which is further reflected in our strategic priorities 2023-26. Furthermore, following consultation, the views of our young people raised their concerns about being 'labelled' and the unintended consequence of adopting this could potentially lead to further stigma.

For the reasons outlined above it is not recommended that Wiltshire adopt progressing making care experienced a tenth protected characteristic at this time. Following discussion during the panel meeting, the Panel endorsed this recommendation.

#### **Cllr Peter Hutton - Chairman, Corporate Parenting Panel**

Update author: Kat McJannet (Head of Children in Care and Young People

10 February 2025



#### **Full Council**

### **25 February 2025**

### **Update on Council Motions (15 October 2024)**

Motion	Actions	Update
2024-05: Winter Fuel Payments	The Leader of the Council to write to the Chancellor of the Exchequer urging a review of the decision to end the winter fuel payments.	It is confirmed the Leader sent a letter as directed to the Rt Hon Rachel Reeves MP urging a review of the decision to end the winter fuel payments.
	Officers to coordinate a social media and press campaign to show Wiltshire residents how to check their eligibility and to register for pension credits	Wiltshire Council's Communications Team coordinated a social media and press campaign to show Wiltshire residents how to check their eligibility and register for pension credits before the deadline on 21 December 2024. Links to pages on the Council's website providing further information are available via the below links:
		Wiltshire Council encouraging people to check if they're eligible for Pension Credit and Winter Fuel Payment - Wiltshire Council  Pension Credit - Wiltshire Council
Motion 2024- 07: Five-year land supply	The Leader of the Council to write to the Secretary of State for Levelling Up, Housing, Communities, and Local Government, and to the MPs representing Wiltshire, to make them aware of the manifest flaws in the housing land supply measure as currently applied and as proposed as part of the government's planning reform consultation.	It is confirmed the Leader sent a letter as directed to the Rt Hon Angela Rayner MP highlighting flaws in the housing land supply measure.
Motion 2024- 08: Wiltshire's Rivers	Council requests a meeting with executives of Wessex Water, Thames Water and Southern Water to	An initial meeting has been held with Wessex Water to discuss their plans for water treatment and the issue of effluent being released into our rivers. An additional meeting has been requested with a wider range of Wessex Water officers and a similar meeting is being

	receive greater clarity on future investment in the overdue upgrades to our sewage systems in Wiltshire.	arranged with Thames Water and Southern Water.
Motion 2024- 10: Salisbury Transportation Strategy	This motion regarding the Salisbury Area Board seeking information about its bit to the Salisbury Transportation Fund was referred to the Leader without debate for any appropriate action.	At their meeting on 6 February 2025, Salisbury Area Board were informed that the wider Salisbury Transport Strategy proposals were being reviewed in the context of the Central Area Framework and draft Local Transport Plan 4, which was due to be considered by Full Council on 11 March 2025. An update from National Highways on their proposals would also be forthcoming and would be shared when available. Salisbury Area Board agreed that requests for further information about the Salisbury Transportation Fund's budget be pursued and fed back to their next business meeting on 3 July 2025. Salisbury Transportation Strategy Schemes would feature as a standing agenda item for further monitoring.

### Perry Holmes - Director, Legal and Governance (Monitoring Officer)

### **Appendices**

None

#### **Background papers**

Minutes of Full Council – 15 October 2024

Council

#### **25 February 2025**

#### **Designation of Statutory Roles**

#### **Purpose of Report**

- 1. For Council to note and ratify the designation of the statutory roles of
  - Director of Adult Services (DASS)
  - Director of Children's Services (DCS)
  - Section 151 Officer

by the Chief Executive using her urgency powers following a change to the senior management structure of the council.

#### **Background**

- 2. The Chief Executive has completed recruitment to the new senior management structure approved by Council on 15 October 2024 (Appendix 1).
- 3. Council has already approved the designation of statutory role of Director of Children's Services to interim Corporate Director Children and Education
- 4. After discussion with the newly appointed Corporate Directors for Care and Wellbeing, Resources and Children and Education further changes have been made.
- 5. The urgent decision was taken to ensure that during the process of recruitment and immediately after, there was no gap in any of the statutory roles.

#### Main Considerations for the Council

- 6. Following the appointment of the Chief Executive, an interim structure was put in place to enable a review of the senior structure to be undertaken. The Chief Executive wished to increase the capacity at senior management level to focus on corporate priorities and to drive innovation, transformation and greater efficiency.
- 7. The review is now concluded and the recruitment process to the new senior structure confirmed to include:
  - The post of Corporate Director Care and Wellbeing to which the Chief Executive has concluded designation of DASS would appropriately be assigned (previously assigned to the Director - Adult Social Care)
  - The post of Corporate Director Children and Education to which the Chief Executive has concluded designation of DCS would

appropriately be assigned when the postholder takes up their post (with the role remaining assigned to the interim Corporate Director – Children and Education in the meantime.)

8. In addition, following the recruitment of the Corporate Director Resources, the remit of this post has been reviewed so that the Chief Executive has concluded that the designation of Section 151 would appropriately be assigned to this role (previously assigned to the Director of Finance and Procurement).

#### **Proposal**

#### 9. That Council:

- Notes and approves the designation of the statutory role of Director of Adult Services (DASS) to the post of Corporate Director Care and Wellbeing with immediate effect
- b) Notes and approves the designation of statutory role of Director of Children's Services (DCS) to the post of Corporate Director Children and Education when the postholder takes up the role.
- c) Notes and approves the designation of statutory role of Section 151 to the post of Corporate Director Resources with immediate effect.
- d) Note that other designated statutory roles are unchanged as a result of the restructure and remain with existing posts:
  - i. Head of Paid Service, Returning Officer (RO) and Electoral Registration Officer (ERO) with the post of Chief Executive
  - ii. Director of Public Health (DPH) with the post of Director Public Health
  - iii. Monitoring Officer with the post of Director Legal and Governance
- e) Authorise the Monitoring Officer to make any consequential changes to the Constitution arising from the designation of the statutory function outlined above.

#### Tamsin Kielb - Director of HR&OD

Report author: Amanda George - Head of Strategic HR / Deputy Director HR&OD

#### Appendices

Appendix 1 – Report to Council 15 October 2024

#### **Background Paper**

Record of Officer Decision – Designation of Statutory Roles

#### **Full Council**

#### 15 October 2024

# Senior Management Structure – changes and designation of the statutory function of Director of Children's Services (DCS)

#### **Purpose of Report**

- 1. For Council to consider and approve a new senior management structure with the deletion of one of the current Corporate Director roles and the creation of two new Corporate Director roles.
- 2. For the Council to consider and approve the deletion of the current role of Corporate Director People.
- 3. For Council to consider and approve a new role of Corporate Director Care and Wellbeing.
- 4. For Council to note the creation of a new Corporate Director Children and Education post and the designation of the statutory role of Director of Children's Services (DCS) to that post, following a change to the senior management structure of the council.

#### **Background**

- 5. On 18 May 2021 Council approved the designation of statutory role of Director of Children's Services to the position of Corporate Director People. The report to Council is attached at **Appendix 1**.
- 6. On 19 August 2024, following confirmation by Full Council on 24 July 2024, the then Corporate Director People, took up position as the Chief Executive. In her role as Head of Paid Service, the Chief Executive has reviewed the senior management structure and considered examples of other council structures. A new proposed structure is set out in Appendix 2.

#### Main Considerations for the Council

7. The Chief Executive wishes to increase the capacity at senior management level to focus on corporate priorities and to drive innovation, transformation and greater efficiency. This will in turn increase the ability of the Council to deliver preventative interventions and overall improve outcomes for residents. The largest element of service provision financially is in Adults Services and having considered how other councils choose to structure their senior team, there is a proposal to create the post of Corporate Director of Care & Wellbeing. This post will line manage the Director of Adult Social Care, Director of Commissioning, and the Director of Public Health and drive transformation work in Adults Services.

- 8. Following the appointment of the Chief Executive the currently designated post for the DCS role of Corporate Director, People was vacant.
- 9. A new post of interim Corporate Director, Children and Education, was created by the Chief Executive using urgency powers, to which the designation of DCS would appropriately be assigned. This position was recruited to by the Officer Appointments Committee on 6 September 2024.
- 10. In order to ensure the responsibilities of the DCS role continued to be carried out appropriately, the Chief Executive authorised, using urgency powers, the redesignation of the statutory role to the new position.
- 11. This proposed new structure increases the number of Corporate Directors from 3 to 4, at a cost of £181,300. This will create a pressure and will be built into the base budget from 2025/26.
- 12. Council is asked to note and ratify those decisions.

#### **Proposal**

#### 13. That Council:

- a. Approves the deletion of the post of Corporate Director People
- Approves the creation of the new post of Corporate Director Care & Wellbeing
- c. Note and ratify the designation of statutory role of Director of Children's Services (DCS) to the new position of Corporate Director, Children and Education
- d. Note that other designated statutory roles are unchanged as a result of the restructure and remain with existing posts:
  - i. Head of Paid Service, Returning Officer (RO) and Electoral Registration Officer (ERO) with the post of Chief Executive
  - ii. Section 151 with the post of Director Finance and Procurement
  - iii. Director of Adult Services (DASS) with the post of Director Adult Social Care
  - iv. Director of Public Health (DPH) with the post of Director Public Health
  - v. Monitoring Officer with the post of Director Legal and Governance

#### Tamsin Kielb - Director of HR&OD

Report author: Amanda George, Head of Strategic HR / Deputy Director HR&OD

#### **Appendices**

Appendix 1 - Report to Council 18 May 2021

Appendix 2 – current and proposed new structure

#### **Background Paper**

Record of Officer Decision – Creation Corporate Director Children & Education and Designation of DCS

