

APPENDIX 3

**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 Act¹, 'Duty to co-operate in relation to planning of sustainable development' outlines additional requirements to Section 33A of the

¹ [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 Country Planning (Local Planning) (England) Regulations 2012². The bodies considered relevant for the preparation of the draft Plan include:
 - Environment Agency
 - Historic England
 - National Highways
 - Natural England
 - Homes England
 - 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 2021³. 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 NPPF⁴ 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

² [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012: Part 2](#)

³ [The Environment Act 2021](#)

⁴ [National Planning Policy Framework \(December 2023\)](#)

December 2024⁵. 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 Guidance⁶ (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 plan-making 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

⁵ [National Planning Policy Framework \(December 2024\)](#)

⁶ [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.

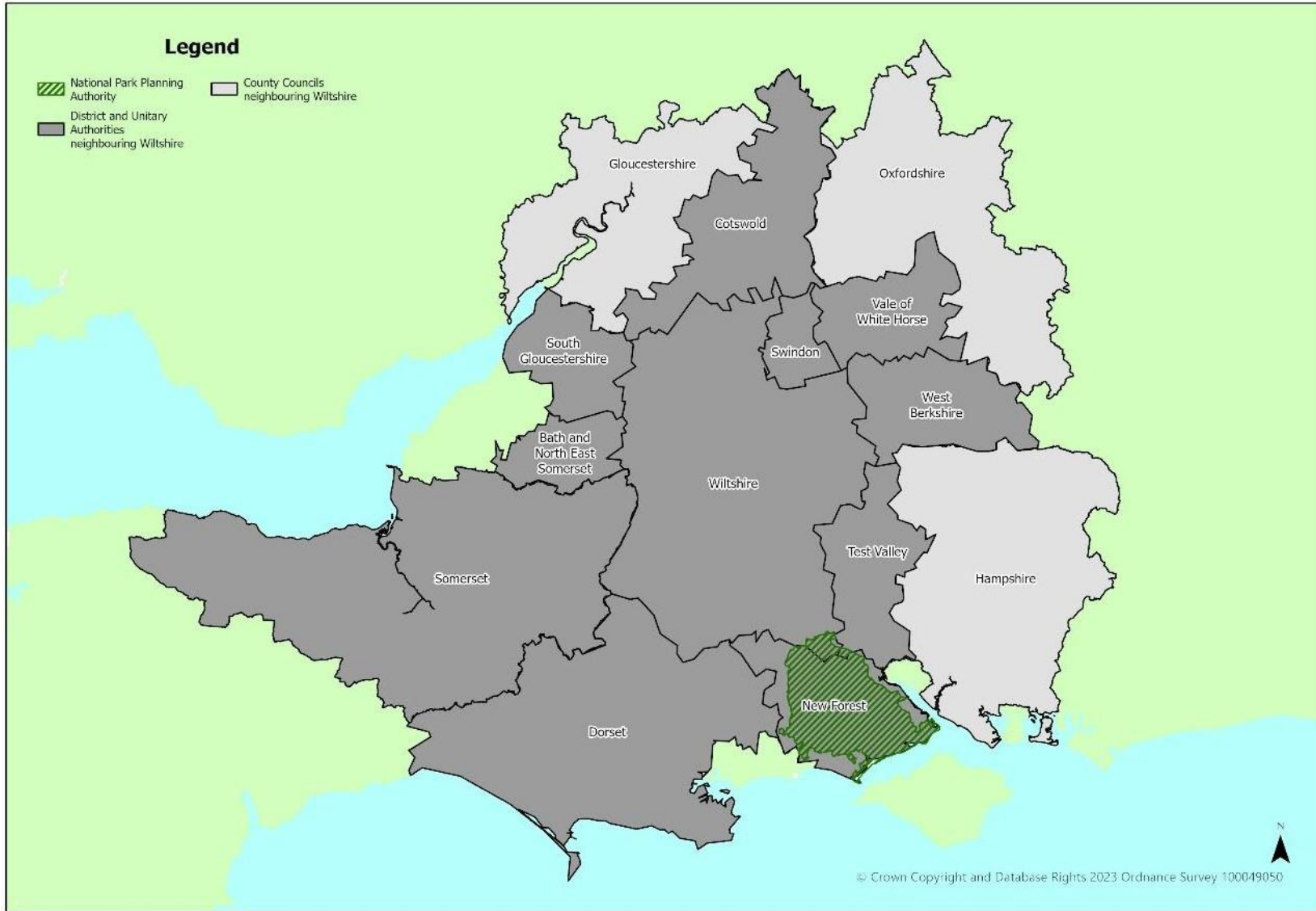


Figure 1: Map showing the current neighbouring local planning authorities in relation to Wiltshire Council

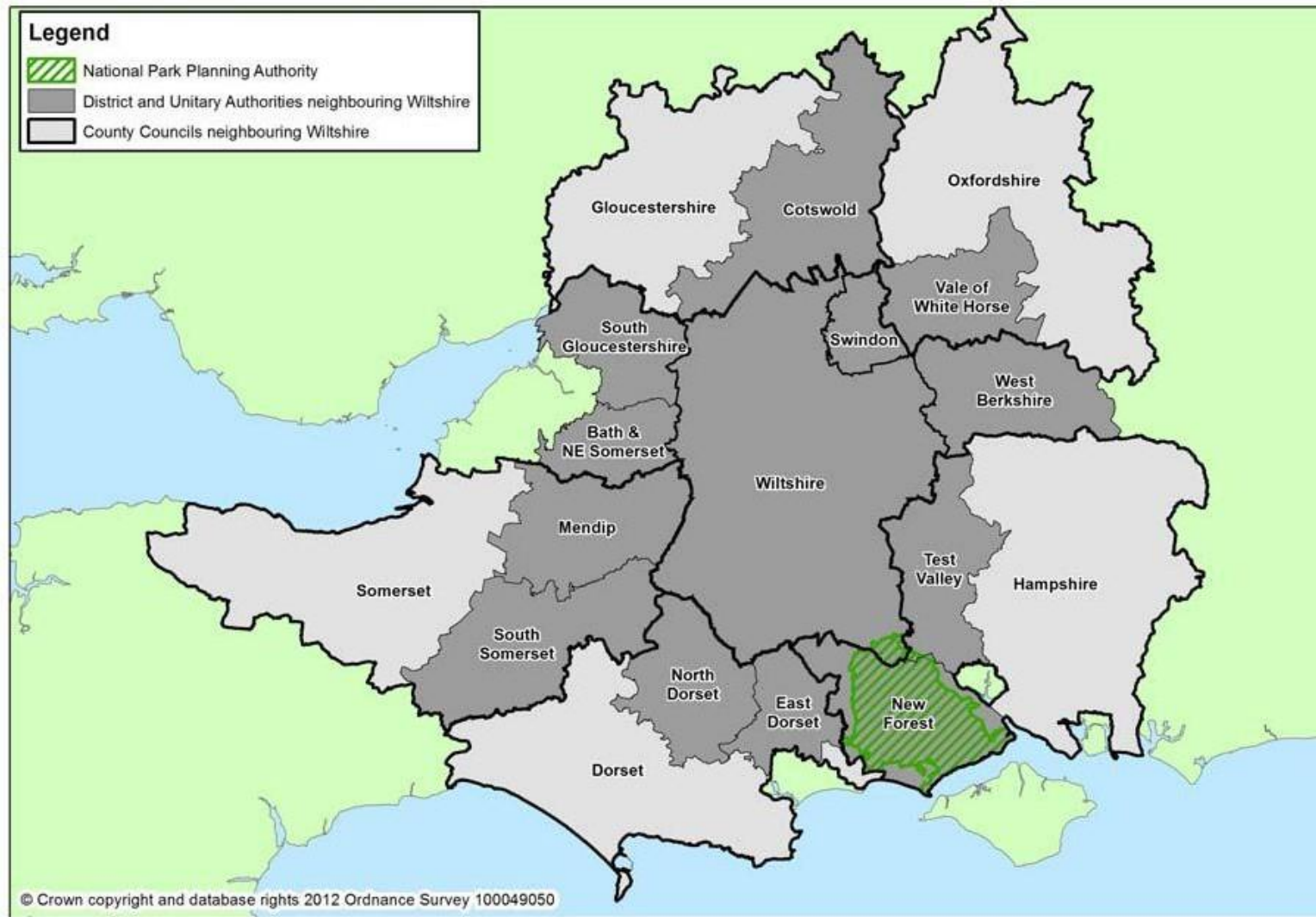


Figure 2: Map showing the authorities adjoining Wiltshire Council pre-Local Government reorganisation.

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 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 Wiltshire⁷. 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 Cabinet⁸ approved an update to the Interim Recreation Mitigation Strategy for the New Forest Internationally Protected Sites (January 2022)⁹ 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

⁷ [Phosphorus and nitrogen mitigation - Wiltshire Council](#)

⁸ [Wiltshire Council Cabinet - Revised New Forest Mitigation Strategy \(7th May 2024\)](#)

⁹ [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.

- 3.26. Wiltshire Council has adopted a strategic nitrogen mitigation scheme¹⁰ for overnight 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

- 3.27. Within the north of the county lies the North Meadow and Clattinger Farm SAC, which 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 cross-boundary 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.

4. Gypsies and Travellers Development Plan 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)¹¹ to establish the

¹⁰ [Phosphorus and nitrogen mitigation - Wiltshire Council](#)

¹¹ [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 Involvement¹² 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)¹³. Table 1 presents a summary of the main actions arising from the consultation.

¹² [Statement of Community Involvement \(July 2020\)](#)

¹³ [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
<ul style="list-style-type: none">• 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 Cabinet¹⁴ and Full Council¹⁵ 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.

¹⁴ [Wiltshire Council Cabinet - Gypsies and Travellers Development Plan Document - Pre-submission Draft Plan \(15 July 2024\)](#)

¹⁵ [Wiltshire Council - Council Meeting \(24 July 2024\)](#)

- 4.15. Following the publication of the DtC Report (August 2024)¹⁶, Wiltshire Council sought representations on its draft Plan between 20th August 2024 and 4th 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

¹⁶ [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 Report¹⁷.

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

¹⁷ [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
<p>Bath and North East Somerset Council (B&NES)</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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.</p> <p>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</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration, including on monitoring.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>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.</p> <p>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.</p>			
Cotswold District Council	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>Correspondence early 2024 – With regard to the GTAA 2024, it 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 hoped the 2041 plan can do the same. There are traveller sites that are located inside Cotswold District but close to the</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>Wiltshire border. Officers are unaware of any specific cross-boundary issues resulting from these sites.</p> <p>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.</p> <p>Regulation 19 consultation – no response received.</p>			
Dorset Council	<p>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.</p> <p>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.</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration, including on the broad location of search in the south-east of Wiltshire for emergency stopping sites.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>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.</p> <p>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.</p>			
<p>Dorset County Council</p> <p>From 1 April 2019 Dorset County Council has combined with the former districts of Purbeck, East Dorset, North Dorset, West Dorset, and Weymouth</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan</p> <p>Document: 2021 to 2024</p>	<p>No outstanding strategic issues.</p> <p>Ongoing collaboration (please see Dorset Council).</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
and Portland to become Dorset Council				
<p>East Dorset District Council</p> <p>From 1 April 2019 East Dorset District Council has been encompassed within the unitary Dorset Council</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues.</p> <p>Ongoing collaboration (please see Dorset Council).</p>
<p>Environment Agency</p>	<p>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.</p> <p>Email correspondence from November 2021 to February 2024 – Correspondence regarding site assessment work</p> <p>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 pre-submission stage (Regulation 19).</p> <p>Specific advice was given in February 2022 by the</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>Environment Agency regarding 6 Hawkeridge Road.</p> <p>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.</p> <p>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.</p>			
<p>Gloucestershire County Council (GCC)</p>	<p>No issues raised.</p> <p>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.</p> <p>They ask whether policy GT3 will impact on nearby Air Quality Management Areas. Wiltshire Council does not consider that</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

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	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.
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	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
<p>National Highways (previously Highways England)</p>	<p>Discussion around strategic housing and employment development, highway and transport infrastructure (e.g. M4 Junctions 16 and 17, A36 and A303).</p> <p>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 to sites. National Highways considered the site selection process reasonable and welcomed assessment criteria to ensure no detrimental impact on the safe operation of the Strategic Road Network (SRN) and safe vehicular access. Suggested wording amendments were made to the criteria to better reflect the requirements of NPPF, to outline that vehicular access should be safe and suitable for all users and that the proposed development does not result in an unacceptable impact on highway safety. National Highways also welcomed the inclusion of site servicing considerations, particularly drainage and water disposal, which should help to address unauthorised connections near the SRN.</p> <p>Regulation 19 consultation - Having reviewed the pre-submission document NH have identified no specific areas of concern with regards to plan soundness and potential adverse impacts on the SRN. With regards the proposed new sites, these appear to be in locations and of a scale that is unlikely to impact the SRN.</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

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	Meeting and email correspondence relating to the following: <ul style="list-style-type: none"> • Affordable Homes Programme • Affordable housing prospectus which included the funding allowance for new traveller sites. • Discussions about site delivery and potential funding opportunities. • Potential pitches to rent, service plots and leasehold 	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	No outstanding strategic issues. Ongoing collaboration (please see

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	<p>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.</p> <p>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.</p>	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.
New Forest District Council	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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</p>	Consultation exercises and events Meetings Workshops	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>consortium of Hampshire County authorities in 2017 – this established limited need.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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,</p>	Email correspondence		

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)	<p>Regulation 18 consultation – The Council confirmed that 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.</p> <p>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 respecting the setting of the National Park.</p> <p>The Hampshire GTAA (May 2017) identified a need for 1 additional gypsy/traveller pitch within the National Park over the period to 2036. This need was met with an allocation in the National Park Local Plan (August 2019), and this site has now been brought granted planning permission. It was confirmed that there are currently no unmet gypsy or traveller needs in the New Forest National Park that need to be met.</p> <p>The Hampshire GTAA (May 2017) also identified a need for 21 additional plots for travelling showpeople households. This need arises from an existing site with a long history and connection to the New Forest, and the Authority advised that they are not looking to neighbouring planning authorities to address this need, which will be met within the National Park.</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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.</p> <p>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.</p>			
NHS England	No issues raised.	Consultation exercises and events Meetings	During the preparation of the Wiltshire Gypsies and Traveller Development	No outstanding strategic issues for this plan. Ongoing collaboration

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
		Email correspondence	Plan Document: 2021 to 2024	
<p>North Dorset District Council</p> <p>From 1 April 2019 North Dorset District Council has been encompassed within the unitary Dorset Council</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues.</p> <p>Ongoing collaboration (please see Dorset Council)</p>
<p>Somerset Council</p> <p>From 1 April 2023 Somerset County Council has combined with the former districts of Mendip, Sedgemoor, South Somerset, and Somerset West and Taunton to become Somerset Council.</p>	<p>Unitary authority formed 1 April 2023. Five district and countywide plans are in existence with adoption dates ranging 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.</p> <p>The former Mendip District Council Local Plan Part 2 is being revised for additional allocations following a direction by the High Court.</p> <p>Regulation 18 consultation (from South Somerset District Council) – No significant cross-boundary issues have been identified.</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration with Somerset Council.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>Regulation 19 consultation - 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.</p>			
<p>South Gloucestershire Council</p>	<p>Regulation 18 consultation – It was noted that there are similarities between Traveller communities in Wiltshire and in 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 Gloucestershire’s approach.</p> <p>The findings of Wiltshire’s GTAA relating to stakeholder engagement were noted, and no comments were made in respect of DtC matters. Commitment was made to further constructive and active engagement with Wiltshire as plan progresses.</p> <p>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.</p> <p>A GTAA has been conducted which shows a high level of need. While there is significant need identified (132), there is</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>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.</p>			

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.	Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).	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. Ongoing collaboration (please see Somerset Council).
Swindon and Wiltshire Business and Growth Unit	No issues raised.	Consultation exercises and events	During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024	No outstanding strategic issues for this plan. Ongoing collaboration.
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	During the preparation of the Wiltshire Gypsies and Traveller Development	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
	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>Plan Document: 2021 to 2024</p>	<p>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.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
<p>Test Valley Borough Council</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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, traveller and travelling showpeople which is currently unmet. The Council are undertaking a further call for sites to seek further sites to be submitted for consideration.</p> <p>Position as of June 2024 – Regulation 18 consultation ended in April 2024. The Council is aiming to carry out Regulation 19 consultation in early 2025. The Regulation 18 Part 2 plan identifies an unmet need, and a GTAA has been commissioned to provide a pitch delivery paper. A Call for Sites was carried out alongside the Regulation 18 Part 2 consultation as need currently exceeds supply.</p> <p>Regulation 19 consultation – no response received</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>
<p>Vale of White Horse District Council</p>	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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 Regulation 18 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</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>Regulation 19 consultation – no response received</p>			
<p>West Berkshire Council</p>	<p>Regulation 18 consultation – West Berkshire raised that there may be cross-boundary implications from unauthorised encampments, depending on where they will be located.</p> <p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>Correspondence (GTAA 2024) – There are cross-boundary issues in the Lambourn/Baydon area, which Wiltshire Council's Enforcement team are aware of. It was noted that there is a potential large site north of Baydon, with the likely access in West Berkshire. It is unknown what the current status of this is. A single Gypsy and Traveller pitch was allowed on appeal in Lambourn (West Berkshire) where residents may potentially use services in Baydon.</p> <p>In terms of travelling showpeople, no cross-boundary issues with Wiltshire were identified.</p> <p>With regard to in-migration, it was reported that some residents have travelled around the south-west, including Wiltshire, and report that they have doubled up on pitches due to availability of pitches. Residents also report using the Hay Lane site in</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
	<p>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.</p> <p>In January 2024 it was updated in relation to the potential site north of Bayden that the site is not occupied at present.</p> <p>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</p> <p>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.</p> <p>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.”</p>			

Duty to Cooperate Body/ Neighbouring Authority	Potential Strategic Interest	How engaged?	When engaged?	Key outcomes
West Oxfordshire District Council	<p>Position as of March 2022 – No cross-boundary issues identified (GTAA, 2022).</p> <p>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.</p> <p>Regulation 19 consultation – no response received</p>	<p>Consultation exercises and events</p> <p>Meetings</p> <p>Workshops</p> <p>Email correspondence</p>	<p>During the preparation of the Wiltshire Gypsies and Traveller Development Plan Document: 2021 to 2024</p>	<p>No outstanding strategic issues for this plan.</p> <p>Ongoing collaboration.</p>

