

EQUALITY IMPACT ASSESSMENT (EIA)

(Please note, this will form part of a public facing document. If you have any questions about this, please contact Equality@wiltshire.gov.uk)

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	Change to Policy or Service	MTFS (Medium Term Financial Strategy)	Service Review
x	x		

Version Control					
Version control number	1.0	Date	02/08/2024	Reason for review (if appropriate)	Draft reviewed and signed off by Spatial Planning Manager
	2.0	Date	22/11/2024	Reason for review (if appropriate)	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 equality@wiltshire.gov.uk 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

Section 1

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 recognised 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 conditions¹

Further to this, there is a crisis of male suicides in the gypsy and traveller communities however these 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 long-term conditions; screening; immunisations; pharmacy and dental services
- Safeguarding and violence prevention
- Mental health
- Maternal health and early years
- Social care and carer support

¹ Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025
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- 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 earlier². Gypsies and travellers are less likely to be satisfied with access to a GP than white British people (60.7% compared to 73.8%³), likewise they are less likely to be satisfied with the service they receive (72.9% compared to 85.5%³). 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.

² Perspectives on ageing in Gypsy families | JRF

³ 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 (ethnicity-facts-figures.service.gov.uk)
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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 Maths⁴. 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 unchallenged⁵.

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 attributes⁶. Roadside encampments can especially affect children safety⁷.

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 understanding⁸. Post birth, few women perceived themselves as requiring help from health professionals in infant feeding, as acceptable and accessible support was available from within

⁴ Gypsy, Roma and Irish Traveller ethnicity summary - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

⁵ 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

⁶ <https://www.themj.co.uk/We-need-to-reach-out-to-disabled-people-in-Gypsy-Roma-and-Traveller-communities/219417>

⁷ 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

⁸ <https://www.aims.org.uk/journal/item/experience-pregnancy-grt-communities>
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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 inadequate⁹.

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 employment¹⁰. 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 movement¹¹. 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 poverty¹². 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 development¹³. 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

⁹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5060882/>

¹⁰ 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*.

¹¹ [Gypsy Roma and Traveller History and Culture | The Traveller Movement](#)

¹² Health and wellbeing in rural areas, Local Government Association, 2017

¹³ [Historical Laws affecting Gypsies and Travellers - Friends, Families and Travellers \(gypsy-traveller.org\)](#)
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engagement with schools. This can limit educational and career opportunities from an early age¹⁴.

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 it¹⁵

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 2021)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 13th January 2021 and 9th March 2021 the Council consulted on the intention to develop the Gypsies and Travellers Development Plan Document under Regulation 18 of the Town and

¹⁴ [Socio-economic influences on children's life chances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/socio-economic-influences-on-childrens-life-chances)

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 Organisations. Version 2.0 21/11/2024

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 20th August 2024 and 4th 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 Wiltshire 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 undertaken¹⁶.

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 strong¹⁷. 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

¹⁶ Rural proofing – Practical guidance to assess impacts of policies on rural areas – March 2017

¹⁷ [The Family Test - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
Version 2.0 21/11/2024

- 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 inform 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 summarising 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

Equality Impact Issues and Action Table (for more information on protected characteristics, see risk assessment document)

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	1. Sites are a reasonable distance to access to services including GP and schools. 2. A permanent site will ensure adaptations to access facilities on site. 3. Alternative formats for the draft consultation and access to information will be designed. 4. Procurement of additional support during the consultation period to raise community engagement	Strategic Planning Applicant developing site External Communications Strategic Planning	September 2025 Ongoing Complete Complete	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 Sites will be suitably developed through planning policy to enable a good standard of living Outcome – easy read leaflet sent to all pitches and plots in Wiltshire Outcome – Opinion Research Services (ORS) commissioned to provide additional support through site visits, telephone and via email
Disability				
1. Proximity to access health services	1. Sites are a reasonable distance to access 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
Gender Reassignment				
No known evidence	To remain under review.			
Marriage and Civil Partnership				
No known evidence	To remain under review.			
Pregnancy and Maternity				

1.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, colour, nationality and Gypsies and Travellers)				
1.Discrimination and access to education and employment opportunities	1. Sites are a reasonable distance to access services such as schools. 2. Dedicated web pages on the council site have all necessary information for school application, home schooling and access to the Travelling Education service.	Strategic Planning Schools Admissions/Targeted Education	September 2025 Ongoing Review	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 Gypsies and Travellers are enabled to access education through the same processes as the settled community
2.Access to appropriate accommodation	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	1. 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				
No known evidence	To remain under review			
Sex				
No known evidence	To remain under review.			
Sexual Orientation				

No known evidence	To remain under review.			
<p>Other (including caring responsibilities, rurality, low income, Military Status etc). Refer to family test: https://researchbriefings.files.parliament.uk/documents/CBP-7714/CBP-7714.pdf</p> <ol style="list-style-type: none"> 1. Proximity to health service 2. Access to digital opportunities 3. Social Isolation 4. Proximity to education and local sport and cultural facilities 				