
Gypsies and Travellers Development Plan Document

Regulation 22 (1)(c)

Consultation Statement

February 2025

Contents

1. Introduction	4
Purpose	4
Background	5
Structure of the Consultation Statement	6
2. Plan Production Timeline	7
Regulation 18 consultation 2021	7
Pre-Submission Wiltshire Gypsies and Travellers Development Plan Document Regulation 19 consultation 2024	9
3. Summary of the main issues	12
Summary of the consultation process	12
Main issues raised pursuant to Regulations 19/20	12
Prescribed bodies and neighbouring authorities	14
Main issues: Gypsies and Travellers Development Plan Document Section 1	22
Main issues: Gypsies and Travellers Development Plan Document Section 2	25
Main issues: Gypsies and Travellers Development Plan Document Section 3	27
Main issues: Gypsies and Travellers Development Plan Document Section 4	36
Main issues: Gypsies and Travellers Development Plan Document Sustainability Appraisal	64
Appendix 1	66
Introduction	66
Regulation 18: How consultation was undertaken	67
Regulation 18: Main issues raised and Council consideration	68
Conclusion	70
Appendix 2	71
Introduction	71
Regulation 19: Who was consulted and how was that undertaken?	71
Regulation 19: Response to consultation	75
Regulation 19: Main issues raised and Council response	78
Schedule 1: Extracts of Regulation 19 consultation advertisement	78
Schedule 2: Summary of the key issues raised by the Regulation 20 representations	105
Gypsies and Travellers Development Plan Document Section 1: Introduction	107
Gypsies and Travellers Development Plan Document Section 2: Objectives	114
Gypsies and Travellers Development Plan Document Section 3: Strategy for Meeting Travellers Needs	116
Gypsies and Travellers Development Plan Document Section 4: Site Allocations	129

Gypsies and Travellers Development Plan Document Section 5: Monitoring and Implementation	215
Gypsies and Travellers Development Plan Document Sustainability Appraisal	217

1. Introduction

Purpose

- 1.1** This Consultation Statement sets out how Wiltshire Council (the council) has undertaken its duties in preparing the Draft Wiltshire Gypsies and Travellers Development Plan Document 2024 - 2038 (the Plan) in accordance with Regulations 18¹ and 19² of the Town and Country Planning (Local Planning) (England) Regulations 2012, hereafter referred to as the TCPR. This statement summarises the stages of consultation that have taken place, explaining who and how the public and stakeholders were invited to participate and make representations, outlining how the main issues raised from the Regulation 18 stages of consultation were taken into account in preparing the Plan whilst also presenting the main issues arising from the Regulation 19 consultation. The presentation of the main issues arising from the Regulation 19 consultation within this report, founded upon the tests of soundness and legal compliance against which the Plan is to be examined, is intended to assist in facilitating a transparent and efficient examination process led by the Planning Inspectorate.
- 1.2** This statement satisfies the requirements of Regulation 22 (1)(c) of the TCPR and demonstrates that consultation on the preparation of the Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement³ ⁴. Some stages of the preparation of the Plan took place during the COVID-19 pandemic. Due to this the 2021 consultation was carried out in line with the council's adopted Statement of Community Involvement and Temporary Arrangements Statement of Community Involvement⁵. The temporary arrangements document represented a response to guidance to Local Planning Authorities to review their Statement of Community Involvement in accordance with Government advice aimed at preventing the spread of COVID-19. The measures within the Temporary Arrangements document reflected the necessity to allow plan-making to progress while promoting effective community engagement by means which were reasonably practicable.
- 1.3** The Statement of Community Involvement document sets out how the council will consult and involve the public and statutory consultees in planning matters. The Statement of Community Involvement has been instrumental in shaping the way in which the Plan has been prepared from inception through to submission. The Statement of Community Involvement will also be used to guide any subsequent consultation required through the Examination process on matters such as 'Main Modifications' to the Plan.
- 1.4** The consultation exercises undertaken by the council have provided early, effective and meaningful engagement with what the TCPR and the council's Statement of Community Involvement define as 'specific' and 'general' consultation bodies. This has included the 'prescribed bodies' and neighbouring local planning authorities, as required by the duty to cooperate.

¹ Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 specifies the consultation that the local planning authority must undertake before it can proceed to publish a 'publication', or 'pre-submission' version of the Gypsies and Travellers Development Plan Document

² Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 specifies that the local planning authority must make available the proposed submission documents for a period of consultation prior to submission of the Gypsies and Travellers Development Plan Document

³ [Statement of Community Involvement](#) Wiltshire Council (July 2020)

⁴ Section 18 of the Planning and Compulsory Purchase Act 2004 (3) requires local planning authorities to prepare a Statement of Community Involvement

⁵ [Statement of Community Involvement Temporary Arrangements](#), Wiltshire Council (July 2020)

- 1.5** The council has prepared a separate Duty to Cooperate Statement which sets out how the council has proactively engaged with ‘prescribed bodies’ and complied with the duty to cooperate in accordance with Section 33A of the Planning and Compulsory Purchase Act 2004 (as inserted by section 110 of the Localism Act 2011).

Background

- 1.6** This Consultation Statement describes how the council has undertaken community participation and stakeholder involvement in the production of the Plan, setting out how such efforts have shaped the Plan and the main issues raised by the consultations and submitted representations.
- 1.7** The primary purpose of the Plan is to address and provide for the future accommodation needs of gypsies and travellers and travelling showpeople in Wiltshire. It will replace ‘Core Policy 47: Meeting the needs of gypsies and travellers’ of the Wiltshire Core Strategy (adopted January 2015).
- 1.8** The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. Together, both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire.
- 1.9** The Plan is being prepared in accordance with national planning policy including Planning Policy for Traveller Sites (PPTS, 2023)⁶ 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)⁷ that establishes the accommodation needs of Wiltshire’s travelling community from 1 April 2024 to 31 March 2038.
- 1.10** The council started preparing the Plan in 2020 and consulted on the proposed scope and content of the Plan in 2021 in line with Regulation 18 of the TCPA. This was informed by an up-to-date GTAA at the time. The first round of public consultation was held between 13 January and 9 March 2021. The council consulted with a range of stakeholders, including prescribed bodies, neighbouring local planning authorities, both statutory and non-statutory bodies, as well as local communities.
- 1.11** The Plan will form part of the development plan alongside the emerging Wiltshire Local Plan review, the Wiltshire Housing Site Allocations Plan, the Chippenham Site Allocations Plan, made neighbourhood plans and the council’s adopted Minerals and Waste Plans.
- 1.12** The draft Pre-Submission Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 of TCPA for a six-and-a-half-week consultation period lasting from Tuesday 20 August until Friday 4 October 2024. The council consulted a range of stakeholders including specific consultation and statutory bodies, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement⁸. Further information on the preparation of the Plan can be found within the ‘Plan Production Timeline’ section of this statement.

⁶ [Planning Policy for Traveller Sites \(PPTS\), December 2023](#)

⁷ [Wiltshire Gypsy and Traveller Accommodation Assessment \(GTAA\), 2024](#)

⁸ [Statement of Community Involvement](#), Wiltshire Council (July 2020)

Structure of the Consultation Statement

1.13 The Consultation Statement comprises the following sections:

- Section 1 is an introduction to this statement, providing context.
- Section 2 sets out the timeline which has been followed in preparing the Plan, explaining and providing the narrative for each stage of its preparation, which is in accordance with the up-to-date Local Development Scheme⁹.
- Section 3 summarises the consultation process and the main issues raised during the course of the consultation carried out under Regulations 18 and 19¹⁰ and how the comments received have been considered by the council.
- Section 3 is supported by the two Appendices providing more technical detail of how consultation was undertaken, the responses received at Regulation 18 and 19 stages and how these comments have been considered.

1.14 Appendix 1 of this statement explains:

- who was invited to make representations and how under Regulation 18 (in accordance with Regulation 22 (1)(c)(i) and (ii)).
- a summary of the main issues raised by those persons under Regulation 18 (in accordance with Regulation 22 (1)(c)(iii)).
- how those issues have been addressed in the preparation of the Plan (in accordance with Regulation 22 (1)(c)(iv)).

1.15 Appendix 2 of this statement explains:

- how those issues have been addressed in the preparation of the Plan under Regulation 19 (in accordance with Regulation 22 (1)(c)(iv)). This appendix also includes a summary of the key issues raised against the Plan in the order they appear in the Plan.

1.16 Copies of all representations made in accordance with Regulation 20 (comments received as part of the Regulation 19 consultation) are available to view online¹¹.

⁹ [Local Development Scheme](#), Wiltshire Council (2024)

¹⁰ In accordance with Regulation 22 (1)(c)(v)

¹¹ Available via the [the council's consultation portal](#)

2. Plan Production Timeline

- 2.1** This section of the statement sets out the timeline that has been followed in preparing the Plan. Table 2.1 outlines the main stages of consultation in the preparation of the Plan up until the date of submission.
- 2.2** Amendments to the Council's Local Development Scheme timeline were approved by [Cabinet on 24 March 2020](#) , which made provision to change the scope of the Wiltshire Local Plan review and progress a separate single-issue plan that meets the accommodation needs of Gypsies and Travellers. Two public consultation stages followed, in line with the up-to-date Local Development Schemes at the time of the consultation.

Table 2.1 The Plan production timeline up until the date of submission

Consultation	Dates
Wiltshire Gypsies and Travellers Development Plan Document Regulation 18 consultation	13 January to 9 March 2021 (in accordance with Regulation 18 of the TCPR)
Pre-Submission Wiltshire Gypsies and Travellers Development Plan Document Regulation 19 consultation	20 August to 4 October 2024 (in accordance with Regulation 19 of the TCPR)

- 2.3** Further information about these stages of consultation is provided below. Information has also been provided, as part of the commentary on the plan production timeline, on other key developments and milestones that have taken place during the preparation of the Plan to assist in illustrating the work undertaken during its preparation.

Regulation 18 consultation 2021

- 2.4** Following approval by Wiltshire Council's Cabinet on 13 October 2020, a consultation on the scope and content of the Plan under Regulation 18 of the TCPR took place between 13 January and 9 March 2021 (a period of eight weeks). This took place alongside consultation on the Wiltshire Local Plan review, as reported to Cabinet on 1 December 2020.
- 2.5** This consultation was aimed at enabling the community and stakeholders to inform and comment upon how the Gypsies and Travellers Plan might deliver the required level of sites/pitches across Wiltshire. By undertaking consultation prior to any allocations being made in a draft Plan, the intention was for people to have the opportunity to put forward their views and inform the Council's thinking in this regard. These views then informed the details of the draft Plan.
- 2.6** Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council's adopted Statement of Community Involvement (SCI) and Temporary Arrangements (July 2020). The temporary arrangements document represented a response to guidance to Local Planning Authorities to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19. The measures within the Temporary Arrangements document reflect the necessity to allow plan-making to progress while promoting effective community engagement by means which are reasonably practicable.
- 2.7** The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local

Planning) (England) Regulations 2012 for councils to make copies of development plan documents available for inspection at their principal offices and at such other places within their area as the local planning authority consider appropriate, during normal office hours. A council can instead comply with Regulation 35(1)(a) by making development plan documents available on their website. This change applied from 16th July 2020 until 31st December 2020 but was extended until 31 December 2021.

2.8 The consultation invited comments on two main documents:

'Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document'

'Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)' (GTAA)

2.9 All the information that was published is available on the Council's website at [Previous consultations \(Regulation 18\) - Wiltshire Council](#)

2.10 As set out in the Council's up-to-date Local Development Scheme (LDS)¹² at the time of consultation, the role of the Plan is to:

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

2.11 In summary, the intention was that the consultation would invite comments on:

- The scope and objectives of the Plan;
- Wiltshire's travelling communities and their accommodation needs;
- Findings of GTAA and level of provision to be planned for;
- Proposed approach to meeting accommodation needs and site; assessment criteria; and
- Call for sites to help identify land that may be suitable for new sites.

2.12 The 'Planning for Wiltshire's Gypsy and Traveller Communities Consultation document' set out the proposed scope of the Gypsies and Travellers Plan, which intended to allocate land for travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036, in line with Government planning policy and legislation.

2.13 The 'Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)' as a key piece of evidence informing the Plan identified permanent and temporary accommodation needs for gypsies and travellers and travelling showpeople for the period 2019-2036.

2.14 The consultation documents were prepared to stimulate discussion on how the Plan should evolve.

¹² [Local Development Scheme, 2020](#)

2.15 Following the consultation, the Council also invited representations from Historic England, Natural England and the Environment Agency on the ‘Sustainability Appraisal (incorporating SEA) Scoping Report’ (2021)¹³. This proposed a Sustainability Appraisal Framework, including objectives and decision aiding questions, to be used in the assessment of draft policies and proposals as part of the plan making process.

Table 2.2 List of documents consulted upon through the Regulation 18 consultation that took place between 13th January and 9th March 2021

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

2.16 Overall, 64 representations were made from different stakeholders including parish and town councils and 20 travellers who responded by telephone. During the consultation the opportunity was also taken to engage with travellers on unauthorised encampments. A detailed summary of this consultation, including the process followed and outcomes arising, can be found in a the ‘Gypsies and Travellers Development Plan Document Consultation Report’, 2021¹⁴.

2.17 Following the consultation, [Cabinet on 13 December 2022](#), approved a revised Local Development Scheme (December 2022) which updated the timeline for the Gypsies and Travellers Plan and extended the plan period to 2038. Aligned to this the base-date was updated to 2022. To ensure the evidence base informing the Plan remained up-to-date, the 2020 GTAA was updated in 2022 and 2024.

Pre-Submission Wiltshire Gypsies and Travellers Development Plan Document Regulation 19 consultation 2024

2.18 In July 2024, Wiltshire Council’s Cabinet ([15 July 2024](#)) and Full Council ([24 July 2024](#)) approved the Wiltshire Gypsies and Travellers Development Plan Document - Pre-submission Draft for publication in line with Regulation 19.

2.19 In response to the Regulation 18 consultation and to take into account the more recent change to national planning policy in relation to the definition of gypsies and travellers, the council’s gypsy and traveller accommodation assessment has been updated to ensure the plan is robust and informed by up-to-date evidence.

¹³ [Sustainability Appraisal Scoping Report, 2021](#)

¹⁴ [Gypsies and Travellers Development Plan Document Consultation Report, 2021](#)

- 2.20** The Gypsy and Traveller Accommodation Assessment (June 2024) (GTAA) has a base date of 1 April 2024 (forming the start of the plan period) and identifies needs across the plan period to 2038. It takes into consideration the revised definition of travellers, which includes those who for educational, health or old age have ceased to travel temporarily or permanently. Previously travellers who had ceased to travel (for whatever reason) were not included. This change was introduced by the December 2023 update to the Government's Planning Policy for Traveller Sites.
- 2.21** Core Policy 47 has been reviewed to ensure the Plan provides a sound basis on which to make provision for the needs of the travelling community and is replaced by policies that work collectively to do this. These include policies allocating new sites and existing sites to allow for additional pitches/plots¹⁵ to come forward as well as safeguarding existing sites so that they can continue to meet needs in the longer term. The Plan takes a supportive approach to allowing for the siting of additional caravans on sites to meet an identified need from teenagers and young single adults, subject to grant of planning permission.
- 2.22** A criteria-based policy is also included to assess other new sites that may come forward to meet demonstrable local needs that arise during the plan period, for example from undetermined households in the GTAA that are later established to meet the planning definition. It also includes a policy to address the needs of households that do not meet the planning definition of travellers, but nonetheless have protected characteristics and may require culturally appropriate accommodation such as mobile homes. There is also a policy covering emergency stopping sites.
- 2.23** In addition, preparation of the Plan has also included the consideration of council owned land to identify sites for allocation due to the lack of private sites put forward through the call for sites exercises.
- 2.24** Wiltshire Council published the proposed submission Regulation 19 version of the draft Plan and supporting documents, including the Sustainability Appraisal, in accordance with Regulation 19 of the TCPR for a consultation period running from Tuesday 20 August to Friday 4 October 2024. The consultation represented an opportunity for all interested parties to have their say on the proposals.
- 2.25** The consultation included the following:
- Online publication of consultation documents on the council's website including the consultation portal.
 - Consultation documents made available for viewing at the council's main office hubs and/or council libraries as appropriate.
 - Press release and publication of adverts in local newspapers covering Wiltshire advertising the start of the consultation.
 - Notifications sent to all Members and Town and Parish Councils.
 - Publicity through council newsletter.
 - Email/letter to consultees on strategic planning consultation database informing them of the consultation.
 - Social media campaign raising awareness of the consultation and how to engage.

¹⁵ When referring to the accommodation needs of these groups reference is made to 'pitches' when referring to gypsies and travellers and to 'plots' when referring to travelling show people.

- In person engagement events and webinar.
- Chair's announcements where possible at Area Board meetings leading up to and at the start of the consultation to publicise the consultation and raise awareness.
- Easy read leaflet was sent to Gypsy and Traveller pitches and Travelling Showpeople plots across the county.
- The council commissioned a third party to provide additional engagement mechanisms for the Gypsy and Traveller and Travelling Showpeople communities through a mix of site visits, telephone and email channels.

2.26 Further information about how this consultation was undertaken can be found within Appendix 2 of this report. A summary of the main issues raised as part of this consultation, in accordance with Regulation 22 (1)(c)(v) of the TCPR, and how the comments received have been considered by the Council can be found within Section 3 of this report.

3. Summary of the main issues

Summary of the consultation process

Regulation 18

- 3.1** Public consultation under Regulation 18 of the TCPR took place in 2021. This consultation invited comments on two main documents: 'Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document' and 'Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)'.
- 3.2** Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the council's adopted Statement of Community Involvement (SCI) and Temporary Arrangements (July 2020). The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 and the council was able to comply with Regulation 35(1)(a) by making development plan documents available on their website.
- 3.3** Further information summarising this Regulation 18 consultation, extracting some key elements from the report in accordance with Regulation 22 (1)(c)(i) to (iv)³⁵, can be found within Appendix 1 of this report.

Regulation 19

- 3.4** In July 2024, Wiltshire Council's Cabinet ([Monday 15 July 2024](#)) and Full Council ([Wednesday 24 July 2024](#)) approved the Wiltshire Gypsies and Travellers Development Plan Document Pre-submission Draft publication in line Regulation 19. The proposed submission Regulation 19 version of the Plan and supporting documents, including the Sustainability Appraisal, were published in accordance with Regulation 19 of the TCPR for a consultation period from Tuesday 20 August 2024 to Friday 4 October 2024.
- 3.5** Appendix 2 provides details of how the requirements of Regulation 22(1)(c)(v)¹⁶ have been met, detailing how this consultation was carried out, who was consulted alongside statistics regarding the number of representations made pursuant to regulation 20. Appendix 2 also presents, at Schedule 2, a summary of key issues raised in those representations, this being intended to provide a more comprehensive list of the issues consultees have raised against each part of the Plan, more comprehensive than the refined list of main issues within the body of this report. A summary of the main issues raised at Regulation 19/20 is provided in the following section of this report.

Main issues raised pursuant to Regulations 19/20

- 3.6** A total of 658 comments were received in response to the Regulation 19 consultation. One petition was received with 487 signatures (Policy GT30 Land at Whistley Road, Potterne) and several representations were submitted on behalf of community groups including The Community of Little

¹⁶ Regulation 22(1)(c)(v) sets out the need to outline the number of representations made and a summary of the main issues. The main issues are detailed within the body of this report

Somerford, Cleverton and Surrounding Area (206 people), Thickthorn and Preston Neighbourhood Group (56 people), Your Village Your Say (Rowde) and Potterne Residents. All the comments can be viewed verbatim within the council's consultation portal¹⁷. Within the consultation portal all representations can be viewed against the part of the Plan to which they relate whilst also being viewable based on who submitted comments.

- 3.7** Unlike earlier stages of the Plan preparation whereby engagement was aimed at shaping the Plan, at the Regulation 19 stage, the council is satisfied that the Gypsies and Travellers Development Plan Document is complete and invited representations on whether stakeholders feel the Plan is sound and / or legally compliant. These representations then define the context and the discussion within the subsequent independent examination.
- 3.8** To help understand what stakeholders have said and to guide the independent examiner, as per the TCPR, it is important main issues are identified from those representations. To assist with this, and to understand what stakeholders have said against each part of the Plan, tables of key issues have been provided within Appendix 2 summarising key elements of what stakeholders have said against each part of the Plan. These key issues have then informed the formulation of main issues, a more succinct list of issues arising from the representations. Representors should understand that these lists of issues do not represent all issues raised through the consultation, rather those the council have identified as main challenges to the soundness of the draft Plan. There are sections/policies where no main issues have been identified. The more comprehensive list of key issues within Appendix 2 also provides information on who has informed each issue, providing further context behind each of the main issues.
- 3.9** The main issues are presented in plan order in a series of tables. Consideration should be given that some main issues, whilst listed against a certain part of the Plan, may reflect issues that have a wider application to simply that part of the Plan. Within each table, where applicable, main issues may have been grouped under thematic headings. The presentation of main issues is preceded by a summary of what specific consultation bodies and neighbouring authorities have said.
- 3.10** For both the tables of main issues and of what prescribed bodies and neighbouring authorities have said, council responses have been issued in some circumstances, often against thematic headings, where this was considered helpful to provide context and response to overarching strategic matters of challenge to assist the examination process. These responses are also intended to introduce and cross reference to other documents that have been prepared, such as statements of common ground, to help guide the reader to further information on matters raised through the consultation. Responses have not been issued to all matters raised in the interests of proportionality and on the understanding that in many cases the strategic responses issued by the council to certain themes provide an overarching context to any more specific and detailed main issues raised by consultees, the details of which can be borne out in the examination.
- 3.11** To assist the examination process, considering the main issues raised, the council understands there may be the need for potential amendments to the proposed submission plan to clarify and improve its overall content. These, in part, may be presented within accompanying signposted documents such as statements of common ground for consideration in due course. A separate schedule of potential changes document has been prepared to help inform the inspector to potential changes to the plan for consideration and subsequently have not been the subject of public

¹⁷ Available via [the council's consultation portal](#)

consultation or sustainability appraisal. This schedule has been submitted in accordance with the approach set out in the Planning Inspectorate’s Procedure Guide for Local Plan Examinations (updated 28 August 2024).

Prescribed bodies and neighbouring authorities

3.12 As anticipated by the TCPR and the Statement of Community Involvement, specific consultation bodies and neighbouring authorities have been consulted on the pre-submission proposals. A high-level summary of the response from these bodies and the main issues raised is set out below.

Natural England

Table 3.1 Summary of main issues raised by Natural England and Council response

Natural England
The Habitats Regulations Assessment concluded that the Plan will not result in adverse effects on the integrity of European sites. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England is satisfied and thus have no objection to the proposals, providing that all mitigation measures are appropriately secured in any permission given.
Council response
Noted and welcomed.

National Highways

Table 3.2 Summary of main issues raised by National Highways and Council response

National Highways
National Highways have identified no specific areas of concern with regards to soundness and potential adverse impacts on the Strategic Road Network. In relation to Objective 3, the reference to sites needing to be in appropriate and sustainable locations with access to services and facilities is supported.
National Highways supports the criteria set out in Policy GT3 on accessibility; vehicular and pedestrian access; impacts on highway safety; and internal site layouts.
In relation to Policy GT7 (Calcutt Park), National Highways considers that the allocation for 1 additional pitch is unlikely to impact on the nearby A419 junction.
In relation to Policy GT18 (Petersfinger Business Park), National Highways considers that, whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing A36 access arrangements, any re-arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.
With regards the proposed new sites, these appear to be in locations and of a scale that is unlikely to impact the Strategic Road Network.
Council response
Noted and welcomed. In relation to Petersfinger Business Park, proposals for intensification to meet the identified need must be in accordance with Policy GT18 and Policy GT3. Policy GT3iv, v, and ix address highway safety and internal design of the site and proposals must comply with the respective technical requirements.

Environment Agency

Table 3.3 Summary of main issues raised by Environment Agency and Council response

Environment Agency
<p>There are a few site allocations that are located in close proximity to current Flood Zones 2 and 3. As the Environment Agency does not know the full extent of future flood zones, it is advised that the Plan requires planning applications to include a sequential approach to site design, ensuring that all built development is outside Flood Zone 2 and 3.</p> <p>There are two proposed sites which contain small amounts of Flood Zone 2 and 3: Policy GT7 – Calcutt Park (flood zone 2); and Policy GT18 – Petersfinger Business Park (flood zones 2 and 3). Any residential accommodation must not be located within current Flood Zones 2 and 3 on the above sites.</p> <p>Two of the proposed site intensification sites are located on Historic Landfill sites: Policy GT22 – Melbourne view; and Policy GT9 – Easton Lane. As part of the planning application to develop these sites the developer would need to ensure that the development would not create unacceptable risk of pollution from any contamination that might exist.</p> <p>To ensure the risks from historic contamination are appropriately managed, the Environment Agency would expect any planning applications to be supported by a risk assessment in line with our guidance Land contamination risk management (LCRM). Should intrusive site investigation be required following the initial Phase 1 Risk Assessment, it is essential that that is carried out with care and using appropriate techniques to ensure no new pathways are created or contamination mobilised.</p> <p>Environmental Permits might be needed for any discharges (e.g., sewage or trade effluent) from these sites.</p>
Council response
<p>Noted and welcomed. At Calcutt Park, Flood Zone 2 covers a small area at the northern end of the site. Policy GT7 directs development to Pitch 12, which is not affected by Flood Zone 2.</p> <p>Regarding Policy GT18, the flood zones lie to the south and southeast of the site. The Site Selection Report Appendix 2 identifies a potential area for development on page 96 (delineated in green) outside the flood zones, but the allocation in GT18 covers the entire site. It is acknowledged there may be a need to consider a change to Policy 18 as part of the examination process to clarify that no development should be in Flood Zone 2 and 3 where they encroach into the site shown on the Policy Map. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.</p> <p>Regarding Policies GT9 and GT22 it is noted that the Environment Agency expects a risk assessment in line with Land Contamination Risk Management Guidance at the planning application stage. It is acknowledged there may be a need to consider a change to the supporting text to Policies GT9 and GT22 as part of the examination process to address the issue of land contamination risk management. To assist this process, a corresponding proposed change on land contamination risk assessment will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.</p>

Historic England

Table 3.4 Summary of main issues raised by Historic England and Council response

Historic England
<p>Historic England did not provide a representation but have subsequently confirmed that they have no comments on the Gypsies and Travellers Development Plan Document.</p>
Council response

Historic England

Noted.

Swindon Borough Council

Table 3.5 Summary of main issues raised by Swindon Borough Council and Council response

Swindon Borough Council (SBC)

Swindon Borough Council may request if neighbouring authorities can assist in meeting the need for Travelling Showpeople if they are unable to accommodate a site within Swindon. This issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.

Under Appendix 1 of the Duty to Cooperate Statement, it would be useful to list Swindon Borough Council, noting the above issue and that Swindon Borough Council was engaged in a similar capacity to other Neighbouring Authorities during the development of the Plan.

Swindon Borough Council looks forward to continuing to work constructively with Wiltshire Council and in particular on broad locations for emergency stopping sites and wider practical policy matters.

Council response

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Swindon Borough Council on these matters, including any emerging evidence and policies on meeting needs for gypsies and travellers in Swindon Borough, in accordance with national planning policy and legislation.

The Duty to Cooperate Statement has been updated to reflect the latest position expressed by Swindon Borough Council.

Bath and North East Somerset Council

Table 3.6 Summary of main issues raised by Bath and North East Somerset Council and Council response

Bath and North East Somerset Council

Within prior meetings with Wiltshire Council, no formal request to Bath and North East Somerset to helping address unmet needs has been made. This approach is supported by Bath and North East Somerset Council. Prior discussions indicated the approach of meeting unmet need or household growth for those not meeting the planning definition of Gypsies and Travellers would be met within the Wiltshire boundary.

The approach taken in terms of local authorities addressing requirements of Gypsies and Travellers who do not meet the national Planning Policy for Traveller Sites planning definition is fairly common.

Unmet need can be met through windfall proposals that are consistent with relevant strategic settlement and housing policies in the Local Plan. This would apply for any windfall site within any local authority and should households from Wiltshire (or anywhere else) seek to purchase land to develop a site in Bath and North East Somerset their planning application would also have to comply with Bath and North East Somerset Local Plan policies.

Bath and North East Council note that Wiltshire Council is generally proactive in taking new sites and changes to existing sites (such as intensification) forward, unless they do not comply with their Local Plan policies.

Bath and North East Somerset Council

Careful monitoring should be undertaken of whether and how the need for pitches for households forming in Wiltshire that do not meet the planning definition is being met. The information from this monitoring will need to inform future review of policy and may, dependent on the conclusions, require consideration to be given to identifying additional sites in areas within Wiltshire close to where the need is arising. As with previous discussions, ongoing collaboration and dialogue is requested on this matter.

Bath and North East Somerset Council welcomes the opportunity to continuing discussing the approach being taken to Gypsy and Travellers needs within Wiltshire to understand and ensure the implications for communities in Bath and North East Somerset are understood and appropriately managed.

Council response

Noted and welcomed. The Plan's Monitoring chapter sets out the approach taken to monitoring of planning permissions and meeting identified need for households that do not meet the planning definition. Wiltshire Council look forward to continuing to liaise with Bath and North-East Somerset Council on these matters and others, in accordance with national planning policy and legislation.

New Forest District Council

Table 3.7 Summary of main issues raised by New Forest District Council and Council response

New Forest District Council

Generally, the Plan is supported by New Forest District Council (NFDC) as a comprehensive approach, including support for the approach to traveller households who do not meet the definition and safeguarding existing sites.

The approach of maximising capacity and the potential of existing sites, subject to environmental, heritage and landscape constraints, is supported.

NFDC trusts that the identification and delivery of a further 2 sites in the south and west of Wiltshire, in accordance with Policy GT5 (Emergency Stopping Sites), will be subject to Appropriate Assessment screening to ascertain impacts on internationally protected sites such as the New Forest SPA/SAC/Ramsar; and that impacts upon the Cranborne Chase and West Wiltshire Downs National Landscape and its setting will also be a consideration in site selection.

The recognition of international protected sites in paragraph 3.37 is welcome, although this should be reflected in the wording of Policy GT3 as well as recognition that likely significant effects from any new sites that come forward may need fresh consideration under Appropriate Assessment, as required by the Habitat Regulations.

The overall conclusion of the Habitats Regulation Assessment that the Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and policies is welcomed. However, this will require ongoing monitoring in line with the Habitats Regulations, particularly if new sites, including Emergency Stopping Sites are to be identified in future.

Given Blandford Road site's location in the National Landscape, NFDC supports that it is not identified for intensification.

The administrative area of Wiltshire Council overlaps with the New Forest National Park in Wiltshire, which is covered by the New Forest National Park authority (NFNPA). It would be helpful if the Plan clarified this. It should be noted that New Forest District Council and the NFNPA are undertaking their own GTAA that will cover this area and will inform future Local Plan policies for the New Forest National Park area.

Council response

New Forest District Council

Noted and welcomed. The requirement for an appropriate assessment at planning application stage is set out in legislation and national planning policy and it is not necessary to repeat the requirements in Policy GT3 and supporting text.

The requirement for an appropriate assessment at planning application stage is set out in legislation and national planning policy and it is not necessary to repeat the requirements in Policy GT5 or supporting text as the location of the two yet to be identified emergency stopping sites is not known at this stage.

It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.

Wiltshire Council look forward to continuing to liaise with the New Forest District Council on these matters and others, in accordance with national planning policy and legislation.

South Gloucestershire Council

Table 3.8 Summary of main issues raised by South Gloucestershire Council and Council response

South Gloucestershire Council

South Gloucestershire Council is generally supportive of the approach taken through the Plan to meeting the accommodation needs of Wiltshire's travelling communities.

Policy GT5 is of particular interest to South Gloucestershire Council as, although the Gypsy and Traveller Accommodation Assessment recommends that there is no need for a formal public transit site in South Gloucestershire at that time, it did recommend that the situation should continue to be monitored and management-based approaches such as negotiated stopping should be considered.

Overall, officers consider that the Plan sets a clear and robust strategy for meeting the identified needs of Wiltshire's travelling communities. The approach set out, and its constituent parts which includes specific site allocations and setting an updated criteria-based policy framework, is considered to be positively prepared, justified, effective and consistent with national policy.

Council response

Noted and welcomed. Wiltshire Council look forward to continuing to liaise with South Gloucestershire Council on these matters and others, in accordance with national planning policy and legislation.

Somerset Council

Table 3.9 Summary of main issues raised by Somerset Council and Council response

Somerset Council
<p>Somerset Council has no specific observations to make on the Plan.</p> <p>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>
Council response
<p>Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Somerset Council in accordance with national planning policy and legislation.</p>

Gloucestershire County Council

Table 3.10 Summary of main issues raised by Gloucestershire County Council and Council response

Gloucestershire County Council
<p>Addressing the impact of Traveller sites on climate is beneficial for all stakeholders within and outside Wiltshire Council. Transport is one of the major contributors to emissions for local authorities, and reducing emissions is a benefit to surrounding air quality. Proximity to public transport, walking and cycling infrastructures, all play a key role in reducing transport emissions. Perhaps, this can be further emphasised in the Site Selection Report.</p> <p>Gloucestershire County Council notes that Policy GT3 mentions mitigation of development on air quality. This is critical as both the National Planning Policy Framework and the Planning Policy for Traveller Sites highlight impact on air quality. It is worth considering if there can be an impact to any nearby Air Quality Management Areas in Wiltshire because of the policy.</p> <p>Tables with colour codes (e.g., Table 20 in the Site Selection Report) should be accompanied with a key along with some explanations of the findings.</p>
Council response
<p>Noted and welcomed. Wiltshire Council agrees that where possible, Traveller sites should be at or near sustainable transport nodes. However, the supporting evidence for the Plan (Site Selection Report and Planning Policy Criteria Review Report) note the rurality of Wiltshire and the need to strike a balance between accessibility and transport sustainability on the one hand, and land availability on the other. Land availability would be unduly constrained if Policy GT3 contained a stricter requirement for accessibility and sustainable transport requirements.</p> <p>In terms of Air Quality Management Areas, Wiltshire Council does not consider that traffic to and from traveller sites is likely to considerably worsen air quality in those areas due to the limited growth associated with this land use.</p> <p>In terms of the colour coding and assessment summaries, Table 20 summarises the detailed findings in the Sustainability Appraisal assessments where the explanation and colour coding can be found. Wiltshire Council look forward to continuing to liaise with Gloucestershire County Council on these matters and others, in accordance with national planning policy and legislation.</p>

Dorset Council

Table 3.11 Summary of main issues raised by Dorset Council and Council response

Dorset Council
<p>Dorset Council does not consider that the distribution of proposed allocations and safeguarded Gypsy and Traveller sites are likely to raise any significant strategic cross boundary matters or issues for Dorset Council. The broad location of search in the south-east of Wiltshire for emergency stopping sites. This search extends up to the shared boundary between Dorset and Wiltshire. Dorset Council would welcome the opportunity for further constructive and active engagement on this issue as part of ongoing co-operation between the councils.</p> <p>Dorset Council will maintain constructive and active engagement with Wiltshire Council on its emerging local plan, and in particular the strategy for meeting Dorset's need for Traveller pitches and plots and any related strategic matters.</p>
Council response
<p>Noted and welcomed. Wiltshire Council look forward to continuing to liaise with Dorset Council on these matters and others, in accordance with national planning policy and legislation.</p>

New Forest National Park Authority

Table 3.12 Summary of main issues raised by New Forest National Park Authority and Council response

New Forest National Park Authority
<p>It is noted that the Key Diagram in Figure 1 helpfully illustrates the boundary of the New Forest National Park around the southern part of Wiltshire. However, it is not entirely clear in this diagram alone what the extent of the Plan area is, although this is helpfully set out in paragraph 1.2. A line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful. Alternatively, a note underneath the Key Diagram explaining the extent of the Plan area would also be useful.</p>
Council response
<p>Noted and welcomed. It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.</p> <p>Wiltshire Council look forward to continuing to liaise with the National Park Authority on these matters and others, in accordance with national planning policy and legislation.</p>

West Berkshire Council

Table 3.13 Summary of main issues raised by West Berkshire Council and Council response

West Berkshire Council
<p>West Berkshire Council supports Policies GT1, GT2, GT3, GT4 and GT5 in identifying the methods of meeting the needs of the travelling community within Wiltshire together with emergency stopping places.</p> <p>Under the duty to cooperate, Wiltshire Council and West Berkshire Council have previously discussed the approach taken and whether there are any cross-boundary issues (none were raised).</p>
Council response
<p>Noted and welcomed.</p>

West Berkshire Council

Wiltshire Council look forward to continuing to liaise with West Berkshire Council on these matters and others, in accordance with national planning policy and legislation.

Main issues: Gypsies and Travellers Development Plan Document Section 1

3.13 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document section 1, namely:

- What is this Plan?
- How to use this Plan?
- How has this Plan been prepared?
- Next steps

Main issues: Section 1

Table 3.14 Gypsies and Travellers Development Plan Document section 1 main issues

Main issues raised: Section 1
<p>Consultation Process</p> <ul style="list-style-type: none"> • Parish Councils: Consultation with parish councils at an earlier stage regarding the site selection process and the proposed sites would have been beneficial. • Local community consultation: The Plan has not been created in consultation with local communities and does not consider the impact on settled residents. • Advertisement of consultation: The consultation process was not widely advertised. A letter should have been sent to everyone in Wiltshire informing them of the process and proposals.
<p>Site Selection Process:</p> <ul style="list-style-type: none"> • Sites omitted that could be expanded as alternatives: A number of existing Gypsy and Traveller sites were omitted from the existing sites in the appraisal that could be expanded as alternatives to new sites. The identified need for 81 pitches should be reduced following the recent granting of planning permissions to 68 pitches. Other planning applications in the pipeline and unauthorised pitches could be considered suitable and could prevent further development in the open countryside. • Unauthorised pitches: Reference made to numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be suitable, even considered brownfield land rather than taking areas of open countryside.
<p>The Plan:</p> <ul style="list-style-type: none"> • Accommodation needs: The Plan is not sound. Query the need to meet accommodation needs. • The Plan is difficult to navigate: The plan is difficult to navigate and does not promote cooperation and transparency. • Funding development of sites: Query how development of the sites will be funded. A financial statement to complete the justification of sites would be expected. • The Plan is out of date and discriminatory: Considers the plan document out of date and ethnically discriminatory.
<p>Monitoring of sites:</p> <ul style="list-style-type: none"> • Site Management: Questions raised over who is responsible for the managing the sites, including maintenance and waste disposal and utilities:
Council responses
<p>Consultation process:</p> <p>Reports have been prepared to document the consultation the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.</p>
<p>Site Selection Process</p> <ul style="list-style-type: none"> • Sites omitted that could be expanded as alternatives: The Site Selection Report describes the approach taken to site selection. Where possible intensification and use of existing sites has been considered to minimise the need for new sites. It is acknowledged there may be a need to consider updating the pitch supply from planning permissions granted since 1 April 2024 as a potential change as part of the

Main issues raised: Section 1

examination process. To assist this process, a corresponding proposed change to Tables 3 and 4 of the Plan will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

- **Unauthorised pitches:** Unauthorised sites were assessed in the Site Selection Report if they could be allocated.

The Plan:

- **Accommodation needs:** The Plan has been prepared in accordance with national planning policy and is based on robust evidence of need in the form of a Gypsy and Traveller Accommodation Assessment (2024).
- **The Plan is difficult to navigate:** The Plan has been written with the intention to explain matters to the reader sufficiently.
- **Funding development of sites:** For privately-owned sites, delivery costs will be met by the site owners or leaseholders. For sites on Wiltshire Council owned land, leaseholders will be responsible for delivery costs. Temporary Emergency Stopping Sites will be delivered and managed by Wiltshire Council.
- **The Plan is out of date and discriminatory:** The Plan is informed by up-to-date evidence, including an Equality Impact Assessment The Plan sets out a strategy to meet the needs of all members of Gypsy and Traveller communities.

Monitoring of sites

Private sites will be managed by the landowner in accordance with the planning permission and conditions, this includes mitigation measures. Sites owned by Wiltshire Council but leased out will be managed by the leaseholder in accordance with the planning permission and the terms of the lease agreement.

Main issues: Gypsies and Travellers Development Plan Document Section 2

3.14 Presented below are the main issues raised with regards to Section 2 of the Gypsies and Travellers Development Plan Document (Regulation 19 Consultation version), namely:

- Objectives

3.15 Main issues: Section 2

Table 3.15 Gypsies and Travellers Development Plan Document Objectives main issues

Section 2 (Objectives)
<ul style="list-style-type: none">• Agricultural Land: Plan should avoid impact on the best and most versatile agricultural land in the county.• Environmental requirements: The plan has no consideration towards net zero targets, noise pollution requirements, flooding and infrastructure requirements.• Balanced communities: Wiltshire Council should seek to support mixed and balanced communities in plan-making and decision taking.
Council responses
<ul style="list-style-type: none">• Agricultural Land: The Site Selection Report describes the approach taken to site selection. While brownfield land or land of poor agricultural quality would be preferred, these sites did not advance to the allocation stage for planning reasons. Gypsy and Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process.• Environmental requirements: The Plan identifies opportunities for low carbon or renewable energy supply at sites where mains cannot be connected to. The policies in the Plan include requirements to mitigate against flooding and noise pollution, and to provide on-site infrastructure to support development. The Sustainability Appraisal Report has also assessed the likely effects of Plan policies and individual sites against a range of sustainability criteria that include climate change, energy, noise pollution, flood risk and infrastructure provision.• Balanced communities: The Plan has been prepared in accordance with national planning policy and is based on robust evidence of need in the form of a Gypsy and Traveller Accommodation Assessment (2024) and accompanied by an Equality Impact Assessment which sets out the evidence and Wiltshire Council's approach to meeting its statutory duties under the Equality Act 2010.

Main issues: Gypsies and Travellers Development Plan Document

Section 3

3.16 Presented below are the main issues raised with regards to Section 3 of the Gypsies and Travellers Development Plan Document (Regulation 19 Consultation version), namely:

- Strategy for Meeting Traveller Needs
- Policy GT1 - Meeting the needs of gypsies and travellers and travelling showpeople
- Policy GT2 - Safeguarding gypsies and travellers, and travelling showpeople sites
- Policy GT3 - New sites and intensification of existing sites
- Policy GT4 - Meeting the needs of gypsies and travellers for culturally appropriate accommodation
- Policy GT5 - Emergency Stopping Sites

Main issues: Section 3

Table 3.16 Gypsies and Travellers Development Plan Document Strategy for Meeting Travellers Needs main issues

Section 3 (Strategy for Meeting Travellers Needs)
<ul style="list-style-type: none">• Key diagram: In the key diagram, a line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful.• Concentration of traveller sites: There is an excessive concentration of sites to a particular area. Sites should be more evenly distributed across Wiltshire and better use should be made of the transport corridor afforded by the A338 and A346.
Council responses
<ul style="list-style-type: none">• Key Diagram: It is acknowledged there may be a need to clarify the area covered by the Plan through an amendment to the supporting text.• Concentration of traveller sites: While a more equal distribution is a desirable approach, the availability of land is one of the main determining factors in identifying suitable sites.

Table 3.17 Gypsies and Travellers Development Plan Document Meeting the needs of Gypsies and Travellers and Travelling Showpeople main issues

Policy GT1 - (Meeting the needs of Gypsies and Travellers and Travelling Showpeople)
<ul style="list-style-type: none"> • Planning Definition: Not including elderly or disabled Gypsies and Travellers does not account for accommodation needs of the whole community and is therefore discriminatory. • Net pitch targets: The supply figures for pitches in paragraph 3.2 of the Plan appear to be invalid and should consider the significant number of newly approved sites and unauthorised sites that have sprung up, thereby reducing the residual need for new pitches down from 81 pitches. • Equality: There should be equal treatment in terms of gaining permission for residential use.
<p>Suggested Modifications:</p> <ul style="list-style-type: none"> • Improve clarity: The wording of Policy GT1 is ambiguous. Concerns raised on what constitutes appropriate intensification. The terms 'authorised sites' and 'safeguarded sites' are interchanged and thus should be clarified. • Include reference to Policy GT3: Incorporate policies GT1 and GT2 with specific reference to compliance with policy GT3. Incorporating this into the policy wording would strengthen the policy's effectiveness and soundness.
Council responses
<ul style="list-style-type: none"> • Planning Definition: Wiltshire Council has prepared the Plan in line with national planning policy. The planning definition of Gypsies and Travellers in the national Planning Policy for Traveller Sites was updated in December 2023 to reflect case law which means that persons of ill health, disability, age or those caring for family members still meet the definition. • Net pitch targets: Table 3 and 4 in the plan (as updated) can be updated to include pitch supply from planning permissions granted since 1 April 2024. • Equality: The Plan proposes to meet identified need through site allocations and where appropriate windfall sites, consistent with national policy for travellers.
<p>Suggested Modifications:</p> <ul style="list-style-type: none"> • Improve clarity: Intensification proposals must meet the requirements in the site allocation policies (where a site is allocated for additional pitches), Policy GT3 and other development plan policy requirements. The approach to safeguarding sites is set out in policy GT2, which states that in addition to those identified in the table, any other site that is subsequently granted permanent planning permission for gypsies and travellers shall be safeguarded in accordance with the policy. • Include reference to Policy GT3 in Policies GT1 and GT2: Policy GT3 is referenced in Policy GT1 and applies to parts i) to iv). Policy GT2 also references GT3 in the third paragraph in relation to site intensification proposals to meet the need of households that do not meet the planning definition. Policy GT3 and supporting text are clear that it applies to existing sites and new sites.

Table 3.18 Gypsies and Travellers Development Plan Document Safeguarding Gypsies and Travellers and Travelling Showpeople sites main issues

Policy GT2 (Safeguarding Gypsies and Travellers, and Travelling Showpeople sites)
<ul style="list-style-type: none"> • Location of sites: Some existing sites are located over 1km away from the nearest pharmacy, as well as other facilities, as well as the potential for increases in vehicular traffic. • Increase in traffic levels: A number of safeguarded sites under Policy GT2 are adjacent level crossings. any development that would materially increase levels of traffic using railway crossings should be refused unless their safety will not be compromised. • Comprehensive and coordinated approach: Development should take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites. This includes the protection of existing utility assets. • Clarity on development: Policy GT2 should specify the specific amount of development to be allowed at each specific site. • Unclear which sites are allocated or safeguarded: Some sites allocated for development are also allocated to be safeguarded • Intensification: Policy GT2 should make clearer reference to which sites are suitable for intensification. • Supporting family cohesion: It is unclear how Policy GT2 would support family cohesion. • Deletion of policy: Policy GT2 seeks to propose restrictions on existing sites, particularly 'land at Petersfinger Business Park'. The policy should be deleted alongside any references to safeguarding or protecting sites. • Additional requirements to mitigate noise pollution: Policies should include provisions requiring developments to provide suitable mitigation of noise pollution.
Council responses
<ul style="list-style-type: none"> • Location of sites: The proximity of each site to nearby key facilities was one of the criteria by which each Site was assessed against. Where proposals come forward for development on safeguarded sites, Policy GT3 v. requires development to ensure that the highway network can accommodate vehicles likely to be generated by the development does not result in unacceptable impact on highway safety. • Increase in traffic levels: Where proposals come forward for development on safeguarded sites Policy GT3 v. requires development to ensure that the highway network can accommodate vehicles likely to be generated by the site and development does not result in unacceptable impact on highway safety. • Comprehensive and coordinated approach: The Planning Policy Criteria Review Report states that in terms of other significant barriers, statutory agencies and consultation bodies are responsible and inform the determination of planning applications. It is considered that development may still be appropriate depending on the view of statutory consultees. The National Planning Policy Framework emphasises that the focus of plan policies and decisions should be on whether development is acceptable use of land and not the control of processes or emissions; and assume that pollution control regimes operate effectively (paragraph 194). • Clarity on development: Safeguarded sites have extant planning permissions which specify the number of pitches and plots permitted. Sites also vary in size, as well being subject to unique physical and planning policy constraints, which may impact the scope for intensification at each site. • Unclear which sites are allocated or safeguarded: Policy GT2 sets out the approach to safeguarding sites including a table listing sites. It is the site itself that is safeguarded according to the Policy rather than the specific number of pitches. • Intensification: The plan allocates existing sites that have an identified need and are suitable in planning terms. The Site Selection Report already qualifies which sites from the Council's perspective are not suitable for more development at this time, but any site could be subject to a proposal in the future, that does meet policy requirements

Policy GT2 (Safeguarding Gypsies and Travellers, and Travelling Showpeople sites)

- Supporting family cohesion: Intensification of existing sites will allow members of the same family to have their own pitches or plots, without the need to relocate elsewhere. Given the exceptional nature of this, it will be important that conditions are used to manage future use of each site.
- **Deletion of policy:** Policy GT2 does not protect a site indefinitely. It seeks to protect it from change of use so it continues to form part of the supply of sites to meet identified need. If in future there is no identified need for showpeople plots then the site could be subject to a permission for change of use.
- **Additional requirements to mitigate noise pollution:** Policy GT3 x. requires development to not result in unacceptable levels of noise, air quality and light pollution

Table 3.19 Gypsies and Travellers Development Plan Document new sites and intensification of existing sites main issues

Policy GT3 (New sites and intensification of existing sites)
<ul style="list-style-type: none"> • Vehicle access: The Plan needs to ensure that all sites are accessible to all types of vehicle. • Transport network: Policy GT3 should require access to walking and cycling infrastructure as well as public transport would be essential to reduce vehicular trips. The policy should refer to the wider transport network, not only to the highway network. • Site constraints and provision of utilities: The policy should be modified to require a comprehensive and co-ordinated approach to development including respecting existing site constraints and ensure provisions of utilities situation. • Infrastructure upgrades: Policy GT3 should require developments that result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades. This includes ensure adequate provision of water and wastewater infrastructure and proper provision for surface water drainage to ground, water courses or surface water sewer. • Communication networks: Policy GT3 doesn't cover accessibility to communication networks, mobile data and broadband coverage. • Surface water drainage strategy: The surface water drainage strategy should better align with the Wiltshire Core Strategy's sustainable drainage system principles and require a management and maintenance scheme, to ensure its long-term durability. • Well-designed sites: It is unclear how the objective of providing well-designed sites will be met. • Impact on residential amenity: The policy should refer to the potential impacts of nearby uses on the Gypsy and Traveller site. • Landscape: Policy GT3 should be amended to require the scale of the development to be appropriate to ensure that it adequately integrates in the wider village, town or countryside. The scale (and layout) of the site should respond positively to the wider settlement pattern and established local character where possible. • Agricultural land: Policy GT3 should include a requirement to avoid best and most versatile agricultural, unless no further suitable sites are available. • Protection of habitats: The policy should require the adequate management and maintenance of buffers to protect sensitive habitats and lighting designed to avoid illumination of sensitive habitats to secure their long-term life. • Site selection criteria: Clarification required as to why only primary schools considered in site selection criteria. • Monitoring and management: It is unclear how Wiltshire Council will monitor and manage each site.
Council responses
<ul style="list-style-type: none"> • Vehicle access: Policy GT3 requires safe vehicular and pedestrian access to be provided and maintained for all users including emergency vehicles and refuse collection vehicles. • Transport network: The Planning Policy Criteria Review report sets an appropriate distance to services and facilities which would be acceptable for walking and cycling. Where public transport is unavailable or walking/cycling is not considered safe, school transport can be provided where sites are more than 3.2km away from the nearest school. • Site constraints and provision of utilities: Policy GT3 covers highway, utilities, drainage. Other on site infrastructure that may be in or over the ground would be subject to comments by statutory agencies, and operators, at planning application stage, and this would inform the determination of a proposal. Policy GT3 requires services to be provided, such as water, power, sewerage and drainage. Where practicable, development should connect to the mains, or an alternative acceptable solution can be achieved.

Policy GT3 (New sites and intensification of existing sites)

- **Infrastructure upgrades:** This appears to in part repeat Building Regulations. Policy GT3 requires that services can be provided, such as water, power, sewerage and drainage. Where practicable, development should connect to the mains, or an alternative acceptable solution can be achieved. The surface water hierarchy is referred to in the Planning Policy Criteria Review report and is applied by the Council when determining the merits of a site.
- **Communication networks:** There will be many areas within Wiltshire with limited communications coverage areas. Whilst this would be desirable, Planning Policy for Traveller Sites does not require access to communication networks.
- **Surface water drainage strategy:** Drainage management and maintenance scheme could be secured by condition but national guidance requires that conditions meet six tests, and where applied they would be enforceable. However it would not be justifiable to generally require this in any planning permission or indeed in planning policy as it cannot be assumed that drainage system would not be maintained by the applicant. Policy GT3 does state that all planning permissions will be subject to conditions. A corresponding proposed change to reference the Council's Drainage Betterment Strategy will be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- **Well-designed sites:** Good site design will be achieved through setting conditions, and the implementation of sites must be done in accordance with approved plans which is a standard condition.
- **Impact on residential amenity:** Noise, air pollution and light pollution impacts on a Traveller site would be assessed at planning application stage with input from the Council's Environmental Health Team, this is no different from the potential impacts from the traveller site on nearby land uses. Any land uses that may impact on existing or new sites in terms of noise, light and air pollution have been considered in the site assessments.
- **Landscape:** This is reflected in the landscape and amenity requirements of Policy GT3.
- **Agricultural Land:** Gypsy and Traveller sites are not considered to be significant development of agricultural land.
- **Protection of habitats:** Management and maintenance scheme could be secured by condition but national guidance requires that conditions meet six tests, and where applied they would be enforceable. However it would not be justifiable to generally require this in any planning permission or indeed in planning policy as it cannot be assumed that protection of habitats would not be ensured by the applicant. Policy GT3 does state that all planning permissions will be subject to conditions.
- **Site selection criteria:** Site availability would be severely constrained given the number of secondary schools in the county.
- **Monitoring and management:** Wiltshire Council currently manages three Gypsy and Traveller sites, but does not manage privately owned sites. This arrangement is anticipated to continue. Section 5 of the Plan sets out how the policies will be monitored.

Table 3.20 Gypsies and Travellers Development Plan Document Meeting the needs of Gypsies and Travellers for culturally appropriate accommodation main issues

Policy GT4 (Meeting the needs of Gypsies and Travellers for culturally appropriate accommodation)
<ul style="list-style-type: none">• Monitoring: It is suggested that careful monitoring should be undertaken for pitches and households that do not meet the planning definition. This information will inform Policy reviews and the demand for sites.
Council responses
<ul style="list-style-type: none">• Monitoring: Noted. Section 5 of the Plan sets out how the policies will be monitored.

Table 3.21 Gypsies and Travellers Development Plan Document emergency stopping sites main issues

Policy GT5 (Emergency Stopping Sites)
<ul style="list-style-type: none"> • Appropriate Assessment Screening: Trusts that Appropriate Assessment screening to ascertain impacts on internationally protected sites will be a consideration in site selection.
Council responses
<ul style="list-style-type: none"> • Appropriate Assessment Screening: Any additional sites to be identified by 2029 that fall within zones for relevant designations would be subject to Appropriate Assessment. The requirement for appropriate assessment at planning application stage is set out in legislation and national planning policy.

Main issues: Gypsies and Travellers Development Plan Document

Section 4

3.17 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document section 4, namely:

- Site Intensification
- Travelling Showpeople
- Site Allocations to meet pitch needs from households that do not meet the planning definition
- New Site Allocations
- Emergency Stopping Site

Main issues: Section 4

Site Intensification

Table 3.22 Gypsies and Travellers Development Plan Document site intensification main issues

Main Issues raised: Site Intensification
<p>Policy GT7 Calcutt Park</p> <ul style="list-style-type: none"> • Flood Zone 2: Policy GT7 Calcutt Park contains small amounts of Flood Zone 2. Any residential accommodation must not be located within Flood Zones 2 and 3.
<p>Policy GT8 Dillons Farm</p> <ul style="list-style-type: none"> • Reference to New Forest Protected Sites: Welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures. • Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.
<p>Policy GT9 Easton Lane</p> <ul style="list-style-type: none"> • Environmental Permits: Environmental Permits for discharges may be required for the site. There may be potential drainage restrictions to adhere to. • Proper management of pollution and contaminants: The developer would need to ensure not to create unacceptable risk of pollution from any contamination that might exist. The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination. • National Grid: National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9).
<p>Policy GT13 The Poplars</p> <ul style="list-style-type: none"> • Extension of Site: Concerns raised over the extension of the site and its location between Sand Pit Lane, the railway and the public bridleway. • Located away from local services: The site is remote from all local services.
<p>Policy GT15 Land South of Bridge Paddocks</p> <ul style="list-style-type: none"> • Existing adjacent Gypsy and Traveller site: This site is located next to a site that is currently occupied by Gypsies and Traveller however is not owned by these families living on the land adjacent. • Overall need: There is a need for new Gypsy and Travellers pitches for families.
Council responses
<p>Policy GT7 Calcutt Park</p> <ul style="list-style-type: none"> • Flood Zone 2: Policy GT7 directs development to Pitch 12, which is not affected by Flood Zone 2.
<p>Policy GT8 Dillons Farm</p> <ul style="list-style-type: none"> • Reference to New Forest Protected Sites: Noted. • Development Height: Noted, development will not reach heights referenced in the comments
<p>Policy GT9 Easton Lane</p> <ul style="list-style-type: none"> • Environmental Permits: Noted, to be addressed at planning application stage or before.

Main Issues raised: Site Intensification

- **Proper management of pollution and contaminants:** It is acknowledged there may be a need to consider a change to the supporting text to Policy GT9 as part of the examination process to address the issue of land contamination risk management. To assist this process, a corresponding proposed change on land contamination risk assessment will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- **National Grid:** The electricity pylons and lines are outside the area identified in the site assessments for development. The site has planning consent.

Policy GT13 The Poplars

- **Extension of Site:** The site assessment demonstrates that the site could be reconfigured to host the two pitches required. The policy reflects the need for noise assessment and highway improvements. Screening would assist mitigating impacts on the public right of way.
- **Located away from local services:** This is an existing site with planning permission - site is within a few km of Westbury which has all necessary services.

Policy GT15 Land South of Bridge Paddocks

- **Existing adjacent Gypsy and Traveller site:** Correct, the allocation is on land owned by different families.
- **Overall need:** Noted.

Travelling Showpeople

Table 3.23 Gypsies and Travellers Development Plan Document Travelling Showpeople main issues

Main issues raised: Travelling Showpeople
<p>Policy GT18 Petersfinger Business Park</p> <ul style="list-style-type: none">• Access: Whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing A36 access arrangements, any re-arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.• Flood Zones 2 and 3: Petersfinger Business Park contains small amounts of Flood Zone 2 and 3. Any residential accommodation must not be located within Flood Zones 2 and 3.
Council responses
<p>Policy GT18 Petersfinger Business Park</p> <ul style="list-style-type: none">• Access: This will be addressed through the planning application stage. The site already benefits from approved access.• Flood Zones 2 and 3: A modification to Policy GT18 will be proposed to clarify that development must be located outside Flood Zone 2 and 3 where they encroach into the site shown on the Policy Map. In considering this issue, an error has come to light with the allocation boundary in Figure 14 and to assist the examination process a potential change has also therefore been identified in the schedule of proposed changes for consideration as part of the examination process.

Site Allocations to meet pitch needs from households that do not meet the planning definition

Table 3.24 Gypsies and Travellers Development Plan Document site allocations to meet pitch needs from households that do not meet the planning definition main issues

Main issues raised: Site Allocations to meet pitch needs from households that do not meet the planning definition	
Policy GT20 Greenfield View	<ul style="list-style-type: none">• Site can accommodate allocation: Support the policy as since the Gypsy and Traveller Accommodation Assessment interview was conducted a need now exists for two pitches. There is adequate space to accommodate them.
Policy GT22 Melbourne View	<ul style="list-style-type: none">• Environmental permits: Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.• Proper management of pollution and contaminants: The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination.
Council responses	
Policy GT20 Greenfield View	<ul style="list-style-type: none">• Site can accommodate allocation: Any planning application will be required to demonstrate the need for the additional pitch and that two pitches can be accommodated.
Policy GT22 Melbourne View	<ul style="list-style-type: none">• Proper management of pollution and contaminants: It is acknowledged there may be a need to consider a change to the supporting text to Policy GT22 as part of the examination process to address the issue of land contamination risk management. To assist this process, a corresponding proposed change on land contamination risk assessment will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

New site allocations

Table 3.25 Gypsies and Travellers Development Plan Document new site allocations main issues

Main issues raised: New site allocations
<ul style="list-style-type: none">• Brownfield sites: Brownfield sites should be identified in preference to greenfield sites.• Delivery costs: No delivery costs for Wiltshire Council owned sites have been considered.
Council responses
<ul style="list-style-type: none">• Brownfield sites: The Site Selection Report includes brownfield sites but they weren't available to be taken forward to the next stage in the assessment process. However, where possible existing sites have been identified to accommodate needs thus reducing the amount of greenfield sites.• Delivery costs: Land in Council ownership will be leased with all costs of site delivery resting with the leaseholder.

Policy GT24 Bushton North Farm, Breach Lane, Bushton

Table 3.26 Gypsies and Travellers Development Plan Document Policy GT24 Bushton North Farm, Breach Lane, Bushton main issues

Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Highways safety: Accessing the site is not considered safe for pedestrians due to a lack of walkways and an unlit road. Breach Lane is not suitable to accommodate the largest vehicles required to enter or exit the site. • Access to farm: A potential change to the policy will be considered to address the issue of alternative access arrangement.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Lack of mains sewer connection: Concern over absence of mains sewerage. Due to the proposed site being on clay, output from any on-site sewerage treatment plant presents a risk to local ecology. Any solution removing foul waste on a regular basis would impact the ongoing site costs. • Financial implications of drainage and utilities connection: Lack of electricity and mains sewage would present a prohibitive cost to development. No evidence that 'the site can enable off-grid power supply and off-grid foul drainage', as stated in the document, in a sustainable and ecologically sensitive way. • Drainage field needed: If the site had a small sewage treatment plant and it failed, the only possible route for sewage discharge would be the field immediately below the site, the Woodyard business and stabling beyond. The impermeable clay subsoil discounts the possibility of a soak-away arrangement. • Inadequate existing drainage solution: Land drainage system around Breach Lane is already inadequate with surface water settling on the road even after short periods of heavy rainfall. Due to clay in the area little rainwater permeates the ground and it drains off the land as surface water • Increase in surface water flood risk: Caravans are particularly vulnerable to flood risk and should be located away flood risk areas. The site is poorly drained and prone to groundwater flooding due to soil being blue clay based. Hardstanding at the proposed site would speed the run-off of floodwater and would likely impact neighbouring fields and businesses. Water runs into a maintained ditch system which leads to east side of Bushton village, flooding occurs on a regular basis in two locations on Royal Wotton Bassett Road.
<p>Site Design (including privacy)</p> <ul style="list-style-type: none"> • Impact on character and appearance of the area: The site is currently greenfield land and the proposal would adversely change the character and appearance of the surrounding area and the amenity of neighbouring properties. The site could be sensitively designed to mitigate any impact.
<p>Landscape</p> <ul style="list-style-type: none"> • Impact on the landscape: Development of the site would be detrimentally to the open countryside setting of the North Wessex Downs National Landscape. Potential light pollution impacts.
<p>River Quality and Biodiversity</p> <ul style="list-style-type: none"> • Impact on ecology and protected species: The site assessment's biodiversity comments identify impacts on ecology and habitats and high risk area for great crested newts. • No protections against wildlife: Concerns over lack of control and mitigation to protect local wildlife from damage.
<p>Scale</p>

Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton

- **Site is larger than necessary:** The 0.5 hectares is larger than necessary for this number of pitches. It is not efficient use of land.

Other Issues

- **Lack of consultation with landowners and tenant farmers:** Site assessed without any site visit or consultation of tenant farmer.
- **Financial impacts to tenant farmer:** Proposal will have financial and unsustainable implications on the tenant farmer.
- **Loss of good quality agricultural land:** Making this site allocation will require grade 2 productive farmland being taken out of production, and possibly adjoining land to accommodate required BNG and sewage treatment facilities.
- **Too many sites for the location:** With the proposed site, the unauthorised site at land north of 34-49 Clyffe Pypard, two further occupied sites on the Bushton to Calne Road and the proposed transit site at Thickthorn, the number of sites within this location is already excessive.

Sustainability Appraisal

- **Site is incorrectly assessed:** Several of the categories have been incorrectly assessed and the Sustainability Appraisal score should be much lower. The weighting has bias.

Council responses

Highways and Transport (including access)

- **Highways safety:** The Site Selection Report assessment states that pedestrian and cyclist access would require these road users to share the carriageway due to the lack of alternative facilities. The highway evidence also confirms that the surrounding highway network is of a suitable geometry to accommodate the size and types of vehicles likely to be generated by the site.
- **Access to farm:** A potential change to the policy will be considered to address the issue of alternative access arrangement.

Utilities and Drainage

- **Lack of mains sewer connection:** The evidence in the Site Selection Report assessment confirms that there is no flood risk at this site. No evidence has been provided to demonstrate that the effluent from foul drainage treatment on site would result in flood risk. The clay soil would preclude use of soakaway features. Foul system should either be sealed or small treatment plant should be installed.
- **Financial implications of drainage and utility connection:** Any off-grid solution costs would be borne by the leaseholder provided they are policy compliant and form part of the permitted scheme.
- **Drainage field will be needed:** The permeability of the site will be tested through the drainage strategy required by the policy. A sewage treatment plant does not necessarily need a drainage field.
- **Inadequate existing drainage solution:** The permeability of the site will be tested through the drainage strategy required by the policy at planning application stage. The evidence in the Site Selection Report assessment suggest that there is no on site flood risk. Where infiltration is not possible on site attenuation would be required as the next suitable technological solution. The highway surface water infrastructure is being reviewed by Wiltshire Council and will need checking and updating where needed to prevent flooding. Culverting would be subject to land drainage consent if required for access.
- **Increase in surface water flood risk:** The evidence in the Site Selection Report assessment does not identify on-site flood risk. The permeability of the site will be tested through the drainage strategy required by the policy. Where infiltration is not possible, on-site attenuation would be required as the next suitable technological solution. The highway surface water infrastructure is being reviewed by Wiltshire Council to reduce the risk of flooding.

Main issues raised: Policy GT24 Bushton North Farm, Breach Lane, Bushton

Site Design (including privacy)

- **Impact on character and appearance of the area:** The policy requirements would ensure that the site can be assimilated into the local area, including hedgerow and woodland planting

Landscape

- **Impact on the landscape:** The interrelationship with the National Landscape is noted in the assessment but screening through hedgerow and woodland planting would be effective mitigation. Screening through hedgerow and tree planting would be effective mitigation.

River Quality and Biodiversity

- **Impact on ecology and protected species:** A small number of pitches (three) is proposed and buffers to hedgerows will be required. The presence of protected species can be assessed at application stage. The mitigation measures identified in Policy GT24 would make the development acceptable in planning terms. Great crested newts mitigation can be achieved through district licencing.
- **No protections against wildlife:** The risk of harm from development to wildlife will be assessed at the planning application stage. Mitigation approaches for the species which are likely to occur on site are well established.

Scale

- **Site is larger than necessary:** There is no requirement in national policy or guidance as to the density of traveller sites. The notional pitch size is at the lower end of the average pitch size in Wiltshire based on the dimensions evidenced in Appendix 1. The remainder of the site requires buffers to hedgerows and some open space remains which is required for other mitigation measures such as drainage fields. Paragraph 4.110 and criterion i. seek to ensure efficient use of land and retention of greenfield land within the site.

Other Issues

- **Lack of consultation with landowners and tenant farmers:** The representations made by tenants have been considered and responded to. Where appropriate, the Council will engage with tenants to discuss any issues raised.
- **Financial impacts to tenant farmer:** It is acknowledged there may be a need to consider a change to the policy as part of the examination process to address the issue of agricultural access to the field to enable access at all times.
- **Loss of good quality agricultural land:** Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process. There is no policy requirement to use 'adjoining land' to accommodate mitigation measures.
- **Too many sites for the location:** Wiltshire Council's evidence in the Site Selection Report is that there are approximately 25 properties that constitute the nearest settlement so the addition of 2 pitches at Clyffe Pypard if permitted and the 3 pitches at Bushton North Farm do not result in excessive development over and above the number of dwellings (and local residents) in the area.

Sustainability Appraisal

- **Site is incorrectly assessed:** The Sustainability Appraisal has assessed all potential sites on a consistent basis against the same set of sustainability criteria. Each site has been assessed taking into account their individual circumstances and proposals for the site. It is considered that the assessment of Bushton North is appropriate given available evidence and using professional judgement.

Policy GT25 Housecroft Farm 1, Bratton Road, Edington

Table 3.27 Gypsies and Travellers Development Plan Document Policy GT25 Housecroft Farm 1, Bratton Road, Edington main issues

Main issues raised: Policy GT25 Housecroft Farm 1, Bratton Road, Edington
Highways and Transport (including access) <ul style="list-style-type: none">• Existing traffic concerns: Policy GT25 is not an appropriate site due to existing traffic and traffic safety concerns due to commuting.• Access to agricultural land: Housecroft Farm 1 proposes using an existing agricultural access, which is overgrown but still in place. This is the only agricultural access to the Housecroft Estate fields from the Bratton Road. While not currently in use, this does not mean that agricultural access will not be required from the Bratton Road in future.
Utilities and Drainage <ul style="list-style-type: none">• Utilities: The cost of installing new utilities for the site would be too high to justify.• Drainage: The site has poor drainage.
River Quality and Biodiversity <ul style="list-style-type: none">• Protected species: Protected species such as owls and bats have been sighted near to the site and the development may affect their habitats. The land provides ecological value.• Incorrect biodiversity assessment of the site: Incorrect assumptions about the 'low' biodiversity of the Site. Concerns that biodiversity hasn't been properly assessed.• Lighting impacts: The development will harm the landscape especially from lighting impacts.• Hedgerows: Existing hedgerows have had additional planting of native species to them by farm tenants and therefore the habitat value of the site has not properly been assessed.
Other Issues <ul style="list-style-type: none">• Unaware of proposals: Some members of the community were unaware of the plans set out in the Plan.• Location: The site is unsuitably located as there are few nearby key facilities, including health facilities. As well as this, there are a number of existing Gypsy and Traveller sites located nearby.
Council responses
Highways and Transport (including access) <ul style="list-style-type: none">• Existing traffic concerns: Visibility splays of 2.4m x 160m are reasonable based on a 50mph speed limit. The site is located on outside of a bend so siting of access will require careful consideration. No highway safety risks have been identified in the Site Selection Report assessment.• Access to agricultural land: A potential change to the policy will be considered to address the issue of alternative access arrangement.
Utilities and Drainage <ul style="list-style-type: none">• Utilities: The site would require off grid foul drainage and power.• Drainage: Off grid foul drainage and infiltration of effluents and surface water are possible based on the assessment in the Site Selection Report.
River Quality and Biodiversity <ul style="list-style-type: none">• Protected species: No specifics are provided and the biodiversity section of the Site Selection Report assessment doesn't identify any presence of protected species at the site.

Main issues raised: Policy GT25 Housecroft Farm 1, Bratton Road, Edington

- **Incorrect biodiversity assessment of the site:** Given the scale of development and nature of the habitats involved, a desk based review is considered appropriate for this site to be allocated in this plan. The applicant will be required to submit a full site survey and Biodiversity Net Gain assessment during the planning application process. Full mitigation details will also be required at that stage so they can be conditioned as necessary.
- **Lighting impacts:** The Site Selection Report assessment acknowledges the rural and exposed location with potential for unacceptable amounts of noise and light pollution but this is amongst other the reason for restricting the development to no more than two pitches.
- **Hedgerows:** Given the scale of development and nature of the habitats involved, a desk based review is considered appropriate for this site to be allocated in this plan. The applicant will be required to submit a full site survey and Biodiversity Net Gain assessment during the planning application process. Full mitigation details will also be required at that stage so they can be conditioned as necessary.

Other Issues

- **Unaware of proposals:** Reports have been prepared to document the consultation the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.
- **Location:** The principle that Gypsy and Traveller sites can be acceptable outside settlement boundaries is established through national Planning Policy for Traveller Sites and the adopted Wiltshire Core Strategy. The site falls within the area of search which is defined using what is deemed a reasonable distance to services and facilities. The Bratton surgery is still open and operates. The nearest lawful sites are not close to the site.

Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington

Table 3.28 Gypsies and Travellers Development Plan Document Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington main issues

Main issues raised: Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Lack of pedestrian infrastructure: There are a lack of public transport options available close to the site. Some commenters also refer to a general lack of pedestrian infrastructure servicing the site.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Flood risk and permeability: Local knowledge would indicate that the clay soil on this site has very poor drainage capability. Water runs from the site either to a nearby ditch or on the roadside. The natural levels of the land makes the risk of contamination of the nearby Milebourne Brook more likely. Infiltration in the Winter months would be minimal. The neighbouring land has standing water on it each Winter despite a comprehensive drainage system. Surface water run off does occur and adds to pollution risk and flooding risk off neighbouring land.
<p>Landscape</p> <ul style="list-style-type: none"> • Loss of farmland: Proposal will result in loss of land from farm for grazing. Mitigation will still lead to impacts to this.
<p>Other Issues</p> <ul style="list-style-type: none"> • Excessive number of existing sites nearby: Too many sites proposed in this local area as well as existing Gypsy and Traveller sites in the area. • Wiltshire Climate Emergency Strategy: The policy does not support the aims and objectives of the Wiltshire Climate Emergency Strategy and is not carbon neutral. • Need for monitoring scheme: No clear monitoring scheme proposed to ensure that occupants of these sites meet the definitions of Gypsies and Travellers. • Lack of communication of consultation: Some members of the community were unaware of the proposals set out in the Plan. The consultation document is difficult to read.
Council responses
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Lack of pedestrian infrastructure: It is accepted that there is no pedestrian infrastructure at the site. The highway assessment in the Site Selection Report does not identify a risk to highway safety.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Flood risk and permeability: The Site Selection Report evidence confirms that there is low/no flood risk at the site (the Site is located wholly within Flood Zone 1, and is at the lowest risk of surface water flooding). Infiltration should be acceptable in this area. There does not appear to be any watercourses nearby that could be used.
<p>Landscape</p> <ul style="list-style-type: none"> • Loss of farmland: Traveller sites are not considered to be significant development of agricultural land. The impact on the loss of farmland was considered at Stage 4 of the site selection methodology, see Table 8 in Site Selection Report.
<p>Other Issues</p>

Main issues raised: Policy GT26 Land at Housecroft Farm (2), Edington Road, Edington

- **Excessive number of existing sites nearby:** The nearest lawful sites are not close to the site.
- **Wiltshire Climate Emergency Strategy:** The National Planning Policy Framework states that the planning system should support the transition to a low carbon future in a changing climate. The development could be supplied by renewable energy as set out in Policy GT26 in view of the distance to the nearest power mains.
- **Need for monitoring scheme:** This can be addressed at planning application stage, setting of conditions and also through the terms of the lease i.e. only persons that meet the planning definition in Planning Policy for Traveller Sites Annex 1 can occupy the land.
- **Lack of communication of consultation:** The representations made by tenants have been considered and responded to. Where appropriate, the Council will engage with tenants to discuss any issues raised.

Policy GT27 Land at Cleverton, Cleverton

Table 3.29 Gypsies and Travellers Development Plan Document Policy GT27 Land at Cleverton, Cleverton main issues

Main issues raised: Policy GT27 Land at Cleverton, Cleverton
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none">• Increase in traffic and pollution: The site will lead to increased traffic, noise, car fumes, and strain on local resources affecting the quality of life for local residents.• Visibility is insufficient: Further visibility than 160m will be required as vehicles travel 70mph and not 50mph. 160m is not achievable because of road curvature and verge topography. Safe vehicular access cannot be achieved based on distances measured from the access point, which is inconsistent with Policy GT3 (criterion iv) in the Plan.• Increase in vehicular movements: There may be 600-900 vehicle movements per week from the site onto a fast B-road due to the lack of public transport and the number of on-site residents including teenagers, business vans and lorries etc. On the basis of 80 vehicle trips per day it is highly unlikely that a safe means of vehicular access can be secured to service the site and quantum of development proposed without harm to the local highway network and its existing users.• No consideration of vehicle trip numbers: Taking into account other types of vehicle movements and teenage children's accommodation needs which the plan doesn't consider, vehicle trips may amount to 90 or more per day.• Road accident history: Crash map evidence shows 24 no. road traffic incidents over the decade to 2022 in the vicinity, three of which were identified as serious.• Pedestrian Access: No pedestrian infrastructure is available and pedestrian access is not achievable in this location.
<p>Utilities and Drainage</p> <ul style="list-style-type: none">• Surface-water runoff: Site is located on impermeable clay which will increase surface water runoff. Numerous flooding events have been reported in this local area. Little Somerford has a flooding problem when water washes down from the hill where the site is, this will be exacerbated by effluent run-off from the development as there is no sewer.• Ditches: Query how will be kept clear of debris to enable free flowing of rainwater drainage.• Insufficient sewerage infrastructure: A sewage treatment plant will fail to function and would result in contamination to the ground both locally and into the River Avon.
<p>Site Design (including privacy)</p> <ul style="list-style-type: none">• Sites should be located within existing housing developments: Gypsy and Traveller sites should be allocated within large housing developments in Chippenham as done elsewhere for example in Hampshire and Berkshire.• Air quality impacts on surrounding properties and no buffer zones proposed: The property on the eastern boundary would be exposed to poor air quality as a result of development. There is no mention of buffer zones and separation distances.• Site will be visible when hedgerows do not leaf: During the six months of the year when the current mature hedgerows and trees are not in leaf, neighbouring properties are in direct line of sight of the proposed site.• Third Party access rights: Third party access rights affect the land.
<p>Landscape</p> <ul style="list-style-type: none">• Development would be clearly visible: The development would be clearly visible from the road and nearby footpaths and would substantially alter the character of the area.

Main issues raised: Policy GT27 Land at Cleverton, Cleverton

- **Failure to consider North Wiltshire Landscape Character Assessment:** Development would offend CP51 as it fails to consider the North Wilts Landscape Character Assessment which identifies a rich evidence of archaeological features and a largely medieval field pattern, local landscape features including mature hedgerows, trees etc.
- **Landscaping may not be effective:** On site planting may not work given the waterlogged nature of the site and there is no evidence how landscaping will be maintained, or prevent removal in the future.

River Quality and Biodiversity

- **Impact on protected species:** Protected species have been observed in neighbouring properties including great crested newts, their habitats therefore may be impacted by the development, noise and light pollution

Historic Environment

- **Impacts to appearance of village which goes against Conservation Area Statement:** Development would have a detrimental effect on the appearance of the village, contrary to the Guidance Recommendations in Little Somerford's Village Design Statement and Conservation Area Statement.

Scale

- **Impact on the local area:** Development would be inconsistent with national planning policy as the scale of the site will dominate the local area and will result in tensions between communities.
- **Scale is unjustified:** The scale of the proposal in terms of pitches and population is unsound and unjustified when considered against Noise Policy Statement for England because it does not demonstrate the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy.

Other Issues

- **Lack of engagement with Parish Council:** Overall lack of engagement with Little Somerford Parish Council as a neighbouring authority to this allocation.
- **Affordable pitches:** Small sites should include affordable pitches to address the needs of existing members of the Gypsy and Traveller community resident in the area.

Council responses

Highways and Transport (including access)

- **Increase in traffic and pollution:** The Site Selection Report states that the likely trip generation from 10 pitches would not be considered a significant increase in traffic on the surrounding network. While the site is distinctly rural, it is not remote or tranquil and would be unlikely to generate unacceptable levels of light or noise pollution, although the scale of development will be a factor on this locally.
- **Visibility is insufficient:** Any access with the increased use will require the visibility of 2m x 160m to the nearside carriageway edge cleared of obstruction at and above 900m. This should be achievable if the original access is used, and this remains correct. The road is straight at this location so forward visibility of turning vehicles is good.
- **Increase in vehicular movements:** For a residential site the Highway Authority would usually go upon movements of between 8-10 for a house per day. For a traveller site a slight reduction to between 4-6 movements would be deemed appropriate. This would result at the top end in approx. 60 movements a day. The access is off a B-road which in its geometry and capacity is suitable to accommodate these types of numbers. The road is straight at this location so forward visibility of turning vehicles is good.
- **No consideration of vehicle trip numbers:** For a residential site the Highway Authority would usually go upon movements of between 8-10 for a house per day. For a traveller site a slight reduction to between 4-6 movements would be deemed appropriate. This would result at the top end in approx. 60 movements

Main issues raised: Policy GT27 Land at Cleverton, Cleverton

a day. The access is off a B-road which in its geometry and capacity is suitable to accommodate these types of numbers. The road is straight at this location so forward visibility of turning vehicles is good.

- **Road accident history:** According to the Highway Authority's records, there have only been 2 personal injury accidents in the last 10 years and nothing in the last 3 years. Within 30m west of the site there has been 3 accidents within the last 3 years.
- **Pedestrian Access:** It is accepted that there is no pedestrian infrastructure at the site. The highway assessment in the Site Selection Report does not identify a risk to highway safety.

Utilities and Drainage

- **Surface-water runoff:** It is acknowledged there may be a need to consider a change to Policy GT27 as part of the examination process to ensure that applicants consider the Wiltshire Council Drainage Betterment Strategy. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- **Ditches:** Clearance of the ditches is responsibility of the land owners under the provisions of Land Drainage Act and riparian ownership responsibility. Lack of maintenance is enforceable under the provisions of Land Drainage Act.
- **Insufficient sewerage infrastructure:** The effluent from treatment plants is considered to be free from pollutants and safe to discharge into the ground.

Site Design (including privacy)

- **Sites should be located within existing housing developments:** The Plan must identify deliverable sites to meet identified accommodation needs. Large housing developments have long lead in times and this would not address a pressing immediate need for new pitches and plots.
- **Air quality impacts to surrounding properties and no buffer zones proposed:** The policy seeks to secure suitable separation distances to neighbouring residential properties, in the interest of safeguarding amenity of future residents of the site and neighbouring residents. Effects in relation to air quality and other forms of environmental pollution are considered to be neutral.
- **Site will be visible when hedgerows do not leaf:** Residential amenity is a separate matter to public visual amenity. Sites do not need to be completely screened, but integrated into the landscape in a character supporting way. In this case through recommended standoff buffers to existing residential properties that share a boundary (largely backing onto the site) with the site with a mix of new tree/hedgerow/woodland planting, some of which could include a native evergreen component. It is acknowledged that it would take time to achieve this.
- **Third Party access rights:** Those rights should already be protected by an easement deed between the land owner and the property owners if they are not then they should be. If there is already an easement then it would remain in force and if there isn't it's a matter for the property owner and the land owner to agree this.

Landscape

- **Development would be clearly visible:** The Site Selection Report assessment states that the site is large enough to accommodate on site planting which would be necessary to integrate development into this exposed field area in a similar way to existing residential settlement bordering the site and within the local area.
- **Failure to consider North Wiltshire Landscape Character Assessment:** Landscape character has been considered in the Site Selection Report assessment taking into consideration appropriate Landscape Character Assessments.
- **Landscaping may not be effective:** Soil types and underlying geology inform and influence what species of trees and other vegetation would be appropriate to specify within any planting proposals, whether that be on the heavier clay soils (more prone to waterlogging) or lighter chalk soils in Wiltshire (more prone

Main issues raised: Policy GT27 Land at Cleverton, Cleverton

to drought). This is a detailed design matter that will need to be considered in combination with appropriate maintenance and management of planting.

River Quality and Biodiversity

- **Impact on protected species:** The presence of protected species can be assessed at application stage. Mitigation approaches for the species which are likely to occur on site are well established.

Historic Environment

- **Impacts to appearance of village which goes against Conservation Area Statement:** The site is large enough to accommodate adequate mitigation in the form of buffers and landscaping to ensure that any development will comply with the guidance set out in the Village Design Statement and Conservation Area Statement. The policy requirements ensure that this will be carried forward in due course with a minimum of the site to be developed and clear requirements for good design and landscape mitigation.

Scale

- **Impact on the local area:** The separation distance between the existing residential development and the site would minimise the impact if development is located near the existing access to the east. Good design of a site, and mitigation measures, assist in successful integration of development into the surrounding area.
- **Scale is unjustified:** The site is large enough to devise a scheme that incorporates substantial standoffs from neighbouring properties, planting and screening. It is not considered that development of the site would contravene extant legislation or policy on noise pollution.

Other Issues

- **Lack of engagement with Parish Council:** Reports have been prepared to document the consultation the Council has undertaken in preparing the Plan. These reports alongside the process and outcomes involved in undertaking the Regulation 19 consultation, and the way in which the Council has undertaken consultation in accordance with its legislative duties and Statement of Community Involvement, has been summarised within this Regulation 22 (1)(c) Consultation Statement.
- **Affordable pitches:** Affordable sites would have to be rented out on a below market value basis. Opportunities to secure funding to support the provision of affordable sites could be explored as part of the delivery of the site.

Policy GT28 Land at Oxhouse Farm, Rowde

Table 3.30 Gypsies and Travellers Development Plan Document Policy GT28 Land at Oxhouse Farm, Rowde main issues

Main issues raised: Policy GT28 Land at Oxhouse Farm, Rowde
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Unsafe access: Unsafe access as the site is close to a blind bend and opposite a junction. • Lack of pedestrian infrastructure: There is no pedestrian infrastructure which is unsafe and will increase car usage and traffic. • Access to farmland: Position of the site will prevent access to another 13 acres of productive farmland.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Flooding: Concerns raised in relation to on-site flooding and flooding of the adjacent highway. • Sewer capacity: There are existing problems with sewer capacity. A drainage solution would require substantial investment.
<p>Landscape</p> <ul style="list-style-type: none"> • High grade agricultural land: The land is high grade agricultural land and should not be lost to development. • Impact on landscape: Development will cause light and noise pollution. This would have a detrimental effect, also on the neighbouring National Landscape.
<p>River Quality and Biodiversity</p> <ul style="list-style-type: none"> • Impact on habitats: The field is often flooded from October to April most years, this 'winterbourne lake' is the habitat for species of frogs, toads, and newts and it is unclear that the Wiltshire Council inspection of the site covered this period of the year. The brook along the east side hosts water voles. • Impact on fauna and flora: Site development, including hedgerow removal for access, would disrupt and impact on on-site fauna and flora.
<p>Historic Environment</p> <ul style="list-style-type: none"> • Impact on heritage asset: If a bund is included, this could be visible from Oliver's Castle/Roundway Hill from the North Wessex Downs National Landscape.
<p>Other Issues</p> <ul style="list-style-type: none"> • Impact on local area: The site would dominate the local area on Devizes Road.
Council responses
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Unsafe access: This is an existing access which will have a level of existing number of movements. Any residential use of the site will increase movements but it is located far enough into the 30mph speed limit that there is adequate forward visibility for vision of right turning and left turning vehicles. Visibility splays of 2m x 90 should be achievable within the highway. It is recognised that Conscience Lane is close to the proposed access but it is clear that there is good intervisibility between junctions which will allow drivers to be aware of vehicles at each location so there is no significant risk to allowing the arrangement.

Main issues raised: Policy GT28 Land at Oxhouse Farm, Rowde

- **Lack of pedestrian infrastructure:** The highway assessment in the Site Selection Report does not identify the lack of a footway adjacent the site as a risk to highway safety as there is a footway immediately opposite the proposed site entrance.
- **Access to farmland:** A potential change to the policy will be considered to address the issue of alternative access arrangement.

Utilities and Drainage

- **Flooding:** Opportunities for bespoke infiltration sustainable drainage system and a drainage strategy considering flood risk from surface water may be required. On-site attenuation storage would be required.
- **Sewer capacity:** The sewer is 150m away. As public sewers are available any other non mains discharge methods (small treatment plant) must be consulted with the Environment Agency.

Landscape

- **High grade agricultural land:** Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process.
- **Impact on landscape:** The site lies adjacent to and accessed from the busy A342 Devizes Road, close to some existing outlying dispersed linear rural settlement located opposite in the rural gap separating Rowde from Devizes. The site, while rural, is not remote or tranquil and would be unlikely to generate unacceptable levels of light or noise pollution.

River Quality and Biodiversity

- **Impact on habitats:** The Site Selection Report assessment states that ecological features can be retained provided the western boundary is adequately buffered and protected. Potential for ground nesting birds and water voles to be considered at planning application stage.
- **Impact on fauna and flora:** The Site Selection Report assessment and policy requires sufficient mitigation, including provision of 15m wide buffer to western hedgerow / stream secured with substantial fencing to prevent future incursion and planting new hedgerow within buffer to create a habitat corridor. The policy requires secure protection of existing boundary features, erection of fencing and retention of a corridor.

Historic Environment

- **Impact on heritage asset:** Tree planting within new and existing/replanted native perimeter hedgerows and development offsets from existing field ditches/small tributary watercourse feeding into Summerham Brook (western site boundary) would be necessary. Additional native tree/woodland planting within the site and at its corners would help assimilate the site into its wider local countryside context.

Other Issues

- **Impact on local area:** The nearest residential properties are opposite the proposed site, numbering approximately 13 properties. Another 8 properties lie to the north-east of the site on the bend of Devizes Road. The number of pitches identified would be less than the number of residential properties in the immediate surrounding area. The development would respect the scale of the local area.

Policy GT29 Land at Upper Seagry Farm, Upper Seagry

Table 3.31 Gypsies and Travellers Development Plan Document Policy GT29 Land at Upper Seagry Farm, Upper Seagry main issues

Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Pedestrian safety: Access to local bus stop and village requires walking along the road which has no footpath, no street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents. Suggest policy changes to provision street lighting, footpath and removing a substantial length of hedgerow. • Highways safety: Narrow lanes to and from site are used for heavy and large agricultural vehicles. • Visibility splay: Limited sight line from the entrance on a national speed limit road, despite the proposed removal of hedgerow. This increases the risk of accidents.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Drainage: The underpinning evidence in the Site Selection Report states that the site should be developed for no more than five pitches. • Sewerage run-off: Sewerage provision will cause polluted run-off into the local environment and worsen biodiversity quality. • Sewage back-up: Sewage must have emergency overflows to cover for breakdown or power failure. These can only be routed to the above waterway. • Flood risk and drainage: The Plan acknowledges that there is evidence of high groundwater, and there is a lack of drainage infrastructure which has caused flooding in the village and near the site. Pitches will compact the soil reducing its ability to adsorb water, resulting in increased runoff, erosion, loss of fertile topsoil. This will impact drainage patterns. • Electricity and water connection: Electricity and water mains are not on site, so it would be a significant cost to install this infrastructure. • Renewable energy: Site is unlikely to have a positive effect regarding the generation of energy from renewable sources as there would be insufficient supply for cooking.
<p>Site Design (including privacy)</p> <ul style="list-style-type: none"> • Proximity to Seagry Village Hall: Site is adjacent to Seagry Village Hall. Any hedge planted would take years to mature to provide privacy.
<p>River Quality and Biodiversity</p> <ul style="list-style-type: none"> • Impact on ecology: There is potential presence of great crested newts and several other species that use the pond as a water source so would be prevented access by development of this site. There are insects, birds, deer and bats which will be impacted by the site placement. • Disturbance of bats: There has not been an assessment of bat populations that could be disturbed by development. • Oak tree: Oak Tree is subject to a Tree Preservation Order which will be affected by the site.
<p>Historic Environment</p> <ul style="list-style-type: none"> • Development on agricultural and historical land: Development could cause irreversible damage to agricultural land with historical and cultural value (through the presence of a medieval ridge).
<p>Other Issues</p>

Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry

- **Inappropriate location:** The site is in proximity to Upper Seagry, which is a small village and an unsuitable location for development.
- **Impact on farming:** The site is on Grade 2 agricultural land and development impact the operation of the current farming use cattle. The tenant was not informed by Wiltshire Council. The existing access is needed by the farmer and a new access will be required for the development.
- **Policy wording:** Inconsistencies in policy wording. Policies GT30, GT26 and GT24 all state 'no more than x gypsy traveller pitches', whereas Policy GT29 states the site 'is allocated for the development of 5 gypsy and traveller pitches'. Limitation of 'no more than' should be added to policy wording.

Sustainability Appraisal

- **Environmental impact:** The statement that the site is of neutral impact is inconsistent with the Plan. Adverse effects will arise from the removal of hedgerows, vehicular pollution (due to increased private car ownership), noise and light pollution.

Council responses

Highways and Transport (including access)

- **Pedestrian safety:** The Site Selection Report identifies that access by pedestrians and cyclists would be achievable by sharing the carriageway.
- **Highways safety:** The Site Selection Report assessment states that the access roads leading to the site are of acceptable geometry to accommodate the vehicles likely to be generated by the site.
- **Visibility splay:** A suitable visibility splay can be achieved within the adopted highway but it may require some setting back of the hedgerow to the south to achieve visibility beyond 60 m and the 30 mph sign entering the village. Any new access toward the centre of the site or south of the northern field access will likely require more hedgerow set back to achieve a suitable visibility. Further discussions with the tenant farmer will be had to agree a suitable solution that preserves the existing agricultural access.

Utilities and Drainage

- **Drainage:** Table 11 in the Site Selection Report notes the drainage requirements and states that development should be restricted to no more than five pitches. It is acknowledged there may be a need to consider a change to Policy GT29 as part of the examination process to clarify that development should be restricted to no more than five pitches. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.
- **Sewerage run-off:** There is no evidence on this. If a sewer connection cannot be achieved, off-grid foul drainage would be required in the form of package treatment plants which treat foulds to an acceptable standard effluent that can be discharged into a watercourse or into the ground by way of infiltration if on site geology permits.
- **Sewage back-up:** If a sewer connection cannot be achieved, off-grid foul drainage would be required in the form of package treatment plants which treat foulds to an acceptable standard effluent that can be discharged into a watercourse or into the ground by way of infiltration if on site geology permits.
- **Flood risk and drainage:** High groundwater does not mean that the site cannot be developed. Means of discharge is limited with infiltration likely to be limited by the high groundwater. There are watercourses to the east of the site which could be utilised to deal with the surface water runoff from the. Policy GT29 identifies the need to provide sufficient drainage measures to manage surface water, groundwater and foul water drainage.
- **Electricity and water connection:** Mains water is available within 5m of the site according to the Site Selection Report assessment. Mains power would require wayleave consent. In the case of refusal this would necessitate the installation of off-grid power generation.
- **Renewable energy:** Occupants should achieve renewable and low carbon power supply where possible.

Main issues raised: Policy GT29 Land at Upper Seagry Farm, Upper Seagry

Site Design (including privacy)

- **Proximity to Seagry Village Hall:** Physical agricultural land separation remains between proposed site and village hall site. New hedgerow and hedgerow tree planting along the sites southern boundary would reduce intervisibility between the site and village hall over the medium term.

River Quality and Biodiversity

- **Impact on ecology:** The Site Selection Reprot advises that the pond in the north-west corner of the site may contain great crested newts, survey required, therefore a licence may potentially be required. The applicant will be able to apply for district level licensing whereby mitigation is provided by a third party at another location.
- **Disturbance of bats:** The impact of development on any potential bat habitats will be assessed during the planning application stage. Key habitats for bats are likely to be the hedgerows and pond which can be retained and protected through a mitigation scheme secured by condition.
- **Oak tree:** There is no Tree Preservation Order for the oak tree, but the site entrance can be adjusted to retain any such trees.

Historic Environment

- **Development on agricultural and historical land:** The Site Selection Report assessment identifies no evidence of historical or cultural value.

Scale

- **Site size and mitigation measures:** The buffer requirements were considered in Appendix 1 to the Site Selection Report and the land area identified in the Plan is sufficient to accommodate buffers.

Other Issues

- **Inappropriate location:** Gypsy and Traveller sites are an exception to the principle that residential development must be located within settlement boundaries. The Site Selection Report identifies an evidenced area of search within which available sites would could be assessed.
- **Impact on farming:** The Site Selection Report assessment considers that this allocation would not have a detrimental effect on the operation of a working farm. While land of poorer agricultural quality would be preferred for development, such sites did not advance to the allocation stage for planning reasons. The council is investigating alternative access arrangements for the site. A potential change to the policy will be considered to address the issue of alternative access arrangement.
- **Policy wording:** Table 11 in the Site Selection Report notes the drainage requirements and states that development should be restricted to no more than five pitches. It is acknowledged there may be a need to consider a change to Policy GT29 as part of the examination process to clarify that development should be restricted to no more than five pitches. To assist this process, a corresponding proposed change will therefore be included within a separate schedule of potential changes to help inform the Inspector for their consideration.

Sustainability Appraisal

- **Environmental impact:** Policy GT29 identifies measures designed to avoid impacts on existing hedgerows; plant new hedgerows and secure mitigation for protected species based on the evidence available.

Policy GT30 Land at Whistley Road, Potterne

Table 3.32 Gypsies and Travellers Development Plan Document Policy GT30 Land at Whistley Road, Potterne main issues

Main issues raised: Policy GT30 Land at Whistley Road, Potterne
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none">• Existing heavy traffic and congestion: Whistley Road is suffering from heavy traffic and congestion.• Footpath safety concerns: If footpath is retained, users will feel intimidated.• Highways safety: Whistley Road is a narrow single-lane highway and cars use driveways to pass each other. There is limited visibility. There is no street lighting and no footpath.
<p>Utilities and Drainage</p> <ul style="list-style-type: none">• Exacerbating flood risk: The fields on and around the site are prone to flooding which also affects the road. Hardstanding would increase water run off towards properties and the frequency and severity of flooding. The ground on the site is poorly drained.• Odour consultation zone: The site is within the Odour Consultation Zone of the Potterne Wastewater Recycling Centre. Preliminary Odour Risk Assessment indicates that there is a slight adverse to medium adverse effect. Tests should be undertaken to predict the likelihood of future residents experiencing poor amenity.
<p>Site Design (including privacy)</p> <ul style="list-style-type: none">• Site doesn't comply with design requirements: The site does not comply with design requirements for Gypsy and Traveller sites as per 2008 Designing Gypsy and Travellers Sites – A Good Practice Guide.• Hedgerow removal: Development would require removal of significant section of hedgerow.• Noise pollution: Noise pollution is a concern for residents, given the open nature of the fields.
<p>Landscape</p> <ul style="list-style-type: none">• Unacceptable landscape harm: Development would result in unacceptable harm to the landscape character of Whistley Road and the setting of the village and to the character and appearance of the area.
<p>River Quality and Biodiversity</p> <ul style="list-style-type: none">• Damaging impacts: The effects this site would have on important wildlife is both irresponsible and damaging.• Land is of ecological importance: The land is of ecological importance in the rural setting, with an ancient and well-established hedge and old wall along the full boundary length of the road.• Protected species: Site assessment's biodiversity comments identify impacts on ecology and habitats and high risk area for great crested newts.
<p>Historic Environment</p> <ul style="list-style-type: none">• Increase in traffic would contravene the Conservation Area: Increase in traffic from the site will be in contravention of the Potterne Conservation Area Statement 2002 which identifies traffic as a key issue. It states that efforts will need to be made to protect the special character of the village to ensure its long term survival for the benefit of existing and future residents, businesses and visitors.
<p>Other Issues</p> <ul style="list-style-type: none">• High agricultural value land: The land is of high agricultural value with fertile soil and should not be developed for this reason.

Main issues raised: Policy GT30 Land at Whistley Road, Potterne

- **Consultation period was too short:** Representor submits that the consultation period is too short and should have adhered to Government advice in the Gunning principles. i.e. 12 weeks.
- **Lack of key facilities:** Lack of amenities, no Doctors surgery, no school and only a small shop. The bus service is light and would require complete reliance on cars, ease of access to such facilities from this site is unsuitable.
- **Salisbury Plain Special Protection Area buffer zone:** The site is within 6.4km buffer of Salisbury Plain Special Protection Area and a greenfield site - question if impacts can be mitigated.
- **Procedural impropriety:** The Plan also appears to meet the threshold of procedural impropriety in the numerous examples detailed above where Wiltshire Council has failed to adhere to the National Guidance, stated incorrect assessments based on flawed evidence and failed to submit evidence to support its subjective decisions. In conclusion, the Plan is not legally compliant and fails to meet the test of Soundness - it is not justified, effective, nor consistent with national policy.

Sustainability Appraisal

- **Objective 1:** Site should be left in natural state for biodiversity purposes.
- **Objective 2:** Land should be preserved for food production.
- **Objective 3:** No existing water or sewage connections.
- **Objective 4:** Adverse environmental impacts.
- **Objective 5:** Development will increase flood risk on road.
- **Objective 6:** Need assurances of sustainable construction practices.
- **Objective 7:** There are many sites of archaeological significance close to the site.
- **Objective 8:** The adverse effect should be major because numerous buildings would be proposed.
- **Objective 11:** Lack of public transport.
- **Objective 12:** The assessment is wrong because Potterne Primary School is closed.

Council responses

Highways and Transport (including access)

- **Existing heavy traffic and congestion:** If a small number of pitches are provided then the road network should be able to accommodate 8-10 movements a day without significant detriment.
- **Footpath safety concerns:** Policy provides for new tree planting and hedgerows around the site that would screen the footpath.
- **Highways safety:** The lack of pedestrian infrastructure is acknowledged in the Site Selection Report and the restriction of the allocation to no more than two pitches.

Utilities and Drainage

- **Exacerbating flood risk:** The subsurface is potentially suitable for infiltration sustainable drainage system, although the design will be influenced by the ground conditions. The site drainage will be required to be designed around flood risk and without increasing flood risk elsewhere. Flooding will need to be investigated as part of the application submission and drainage strategy.
- **Odour consultation zone:** Further technical evidence consistent with the advice from Wessex Water would be required to support development of this site. However, as the site is no longer available for development, this has not been given further consideration.

Site Design (including privacy)

Main issues raised: Policy GT30 Land at Whistley Road, Potterne

- **Site doesn't comply with design requirements:** It is considered that the sustainability appraisal of this site has adequately assessed likely effects of developing this site using available evidence sources and professional judgement.
- **Hedgerow removal:** It is possible to replant a new characteristic roadside hedgerow on an adjusted alignment, but this is likely to require hedgerow removal and replanting that extends beyond the frontage boundary limits of the site.
- **Noise pollution:** The site assessment evidence acknowledges the reduced sense of privacy and potential increase of noise and light but not to a degree that it would result in discounting the site.

Landscape

- **Unacceptable landscape harm:** The Site Selection Report assessment does not identify harm to the National Landscape or its setting. Replanting of hedgerows can address any harm to local landscape character.

River Quality and Biodiversity

- **Damaging impacts:** Policy GT30 identifies required mitigation to make the site acceptable in planning terms.
- **Land is of ecological importance:** This is noted in the Site Selection Report and the site must accommodate no more than two pitches near the road access to avoid impacts on the hedgerows within the interior of the site.
- **Protected species:** The risk of harm from development to wildlife will be assessed at the planning application stage. Mitigation approaches for the species which are likely to occur on site are well established.

Historic Environment

- **Increase in traffic would contravene the Conservation Area:** Development will be required to avoid or minimise harm to the significance of designated and non-designated heritage assets, including by development within their setting.

Other Issues

- **High agricultural value land:** Traveller sites are not considered to be significant development of agricultural land. The effects on a working farm were considered at the early stages of the site selection process.
- **Consultation period was too short:** Noted. There is a minimum consultation length requirement of 6 weeks which has been exceeded. The consultation took place between 20 August and 4 October 2024.
- **Lack of key facilities:** The site falls within the area of search which is defined using what is deemed a reasonable distance to services and facilities.
- **Salisbury Plain Special Protection Area buffer zone:** A potential change to Policy GT30 to address this could be considered. However, as the site is no longer available for development, this has not been given further consideration.
- **Procedural impropriety:** The Council has consulted on a Plan it considers sound, and justified by its evidence, and any objections will be considered through public examination.

Sustainability Appraisal

It is considered that the sustainability appraisal of this site has adequately assessed likely effects of developing this site using available evidence sources and professional judgement. However, it is acknowledged that Potterne Primary School is closed and the Sustainability Appraisal should have referred to the nearest primary school being in Devizes, not Potterne, which is approximately 3.5 km from the site. This is within

Main issues raised: Policy GT30 Land at Whistley Road, Potterne

the 6km distance in the site selection methodology that is used when considering access to primary schools. Further information about this is in the Planning Policy Criteria Review report that was published alongside the draft Plan.

Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham

Table 3.33 Gypsies and Travellers Development Plan Document Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham main issues

Main issues raised: Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham
<p>Highways and Transport (including access)</p> <ul style="list-style-type: none"> • Highway safety: The site proposes safety risks as it is located on a 60mph road and there is no pavement or street lighting. • Site access: Access to A3102 is not accessible. Entrance is via narrow country lanes which have speed bumps, awkward turns, vegetation overgrowth and are often flooded.
<p>Utilities and Drainage</p> <ul style="list-style-type: none"> • Flood risk: Increase of flood risk in the immediate surrounding area, due to evidence of medium/ high groundwater risk on site. This will have multiple impacts. The installation of hard standing will also cause challenges for site drainage. • Drainage infrastructure: Additional residents will put pressure on drainage infrastructure and watercourses. • Access to infrastructure: No access to water, sewerage, electricity or gas. There is no electricity supply running past the site and nearest mains sewer is over 2km away, the provision of this infrastructure will be expensive. • Surface and groundwater quality: Pitches on this site will adversely affect surface, ground and drinking water quality/quantity due to information presented above.
<p>Site Design (including privacy)</p> <ul style="list-style-type: none"> • Impact on residential amenity: Concerns over potential impact on residential amenity resulting from increased levels of noise, air and light pollution.
<p>Landscape</p> <ul style="list-style-type: none"> • Adverse impact on the surrounding landscape: The site's basic facilities will not be temporary which will change the character of the rural area.
<p>River Quality and Biodiversity</p> <ul style="list-style-type: none"> • Biodiversity Net Gain: The proposal will result in adverse impacts on the biodiversity of the existing agricultural field as it may not be possible to deliver Biodiversity Net Gain on the site.
<p>Other Issues</p> <ul style="list-style-type: none"> • Access to farm: Site allocation will block access to 26.77 acres of agricultural land for the tenant. This will subsequently impact their farming business. Loss of the best and most versatile grade 2 agricultural land. • Informing tenants: Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm. • Brownfield sites: Not all brownfield options have been included in the site assessments.
Council responses
<p>Highways and Transport (including access)</p>

Main issues raised: Policy GT31 Land at Thickthorn Farm, Preston Lane, Lyneham

- **Highways safety:** The Site Selection Report assessment states that the access roads leading to the site are of acceptable geometry to accommodate the vehicles likely to be generated by the site.
- **Site access:** There is an existing access which has operated without any highway safety issues, personal injury accident data for the location does not indicate a safety issue. The surrounding highway network is of a suitable geometry to accommodate the size and types of vehicles likely to be generated by the site.

Utilities and Drainage

- **Flood risk:** The Emergency Stopping Place site selection report notes that the site is in a medium/high area of groundwater risk meaning that infiltration may be difficult. Other than the groundwater risk the site does not have any outstanding flood concerns and should be able to be drained. If infiltration tests return poor results, on-site attenuation storage would be required.
- **Drainage infrastructure:** The site does not require mains connection due to its temporary use. The Emergency Stopping Place Strategy and the Plan (at paragraph 3.49) explain that emergency stopping sites are basic sites with limited facilities equipped with hardstanding, fence, and rubbish disposal as a minimum but portable toilets, water and sewage disposal could also be made available, consistent with Government advice.
- **Access to infrastructure:** The site does not require mains connection due to its temporary use. The Emergency Stopping Place Strategy and the Plan (at paragraph 3.49) explain that emergency stopping sites are basic sites with limited facilities equipped with hardstanding, fence, and rubbish disposal as a minimum but portable toilets, water and sewage disposal could also be made available, consistent with Government advice.
- **Surface and groundwater quality:** The drainage evidence confirms that technical solutions in the form of on-site attenuation should be pursued if infiltration cannot be achieved. It is considered that this would address any flood risk on site without increasing it anywhere else in accordance with national planning policy and guidance.

Site Design (including privacy)

- **Impact on residential amenity:** On site mitigation measures will assist screening the site to limit the impacts on the surroundings. Any engagement in hostile behaviour would be a civil matter.

Landscape

- **Adverse impact on the surrounding landscape:** Policy 31 requires the provision of additional hedgerows and additional tree/copse planting to mitigate landscape impacts from the development.

River Quality and Biodiversity

- **Biodiversity Net Gain:** The Emergency Stopping Sites report assessment states states that the field is improved and of low biodiversity value. Depending on the number of pitches, meeting the Biodiversity Net Gain requirements may not be achievable on-site, therefore off-site delivery may be required.

Other Issues

- **Access to farm:** A potential change to the policy will be considered to address the issue of alternative access arrangement.
- **Informing tenants:** The Council remedied this by communicating directly with tenants the week after the Cabinet report was published. The Council accepts that this should have been handled better to avoid this situation.
- **Brownfield sites:** The Emergency Stopping Sites assessment considers sites within the extended areas of search that were considered available, but also sites ruled out for permanent traveller sites. No brownfield sites were considered available for this use.

Main issues: Gypsies and Travellers Development Plan Document Sustainability Appraisal

3.18 Presented below are the main issues raised by the representations with regards Gypsies and Travellers Development Plan Document Sustainability Appraisal.

Main issues: Section 5

Table 3.34 Gypsies and Travellers Development Plan Document section 5 main issues

Main issues raised: Sustainability Appraisal
<ul style="list-style-type: none">• Plan is not sound: The Plan is not sound and scores poorly against Sustainability Appraisal objectives, Objective 2 of the Plan and national guidance regarding the location of such sites.• Sustainability of the plan: The sustainability of this Plan is unsatisfactory.• Limiting open-countryside development: Local planning authorities should very strictly limit new development in open countryside that is away from existing settlements or outside areas allocated in the development plan. They should ensure that sites in rural areas respect the scale of and do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure.
Council responses
The Sustainability Appraisal has assessed the likely effects of the Plan using available evidence sources and professional judgement in accordance with the relevant legislation and guidance.

Appendix 1

Introduction

- 4.1** This appendix is intended to address how the requirements of Regulation 22(1)(c) (i) to (iv) have been met and sets out:
- i. Which bodies and persons the local planning authority invited to make representations under Regulation 18
 - ii. How those bodies and persons were invited to make representations under Regulation 18
 - iii. A summary of the main issues raised by the representations made pursuant to Regulation 18
 - iv. How any representations made pursuant to Regulation 18 have been taken into account.
- 4.2** In addressing how these legislative requirements have been met this appendix will also, in part, signpost to other reports that have been prepared to demonstrate legislative conformity.
- 4.3** Public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 took place over eight weeks from 13 January to 9 March 2021¹⁸, on the proposed scope and content of the Gypsies and Travellers Development Plan Document (the Plan). Overall, more than 45 representations were made from circa 44 people and organisations. In addition, more than 1,300 people attended the live consultation events held as part of the consultation.

Structure of Appendix 1

- 4.4** Section 2 of this Appendix sets out which bodies and persons were consulted and how that was undertaken.
- 4.5** Section 3 of this Appendix provides links to the reports that provide further information and summarise the main issues raised in response to the consultation and the response of the Council indicating how the comments were taken into account in the next stage of Plan preparation.
- 4.6** Section 4 of this Appendix sets out a conclusion on the efficacy of the Regulation 18 consultation process.

¹⁸ In accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England) Regulations 2012

Regulation 18: How consultation was undertaken

Who was consulted and how was this undertaken?

- 4.7** Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council's adopted Statement of Community Involvement (SCI)¹⁹ and Temporary Arrangements²⁰ The temporary arrangements document represented a response to guidance²¹ to Local Planning Authority's to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19. The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 for councils to make copies of development plan documents available for inspection. The Council could instead comply with Regulation 35(1)(a) by making development plan documents available on their website.
- 4.8** A wide range of methods were used to raise awareness about the consultation and to encourage people to respond, these methods ensuring they reached stakeholders including:
- Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and Highways England)
 - Specific Gypsy and Traveller organisations and planning agents operating in Wiltshire
 - Neighbouring local authorities
 - All parish and town councils
 - Parish and town councils adjacent to Wiltshire
 - Wiltshire Councillors
 - Individuals, community groups and organisations who had previously requested to be informed about updates relating to Wiltshire planning policy.
- 4.9** The methods used for contacting people included those outlined within Table 4.1

¹⁹ [Statement of Community Involvement](#), Wiltshire Council (July 2020)

²⁰ Statement of Community Involvement Temporary arrangements, Wiltshire Council (July 2020)

²¹ Planning Practice Guidance: Plan Making <https://www.gov.uk/guidance/plan-making> (Paragraphs 077 and 078)

Table 4.1 Lists various means by which consultees were made aware of the Gypsies and Travellers Plan consultation at Regulation 18

Consultation method
Notification emails sent to Spatial Planning mailing list (circa 1,500 recipients on mailing list)
Notification letters sent to Spatial Planning mailing list (circa 78 recipients on mailing list requested postal notifications)
Inclusion within Wiltshire Council email newsletter sent to residents (circa 23,000 recipients on mailing list)
Inclusion within Wiltshire Council email newsletter sent to two stakeholder mailing lists (circa 1,500 recipients on mailing list)
Inclusion within newsletter sent to Wiltshire Council members (98 recipients on mailing list)
Inclusion within newsletter sent to Wiltshire town and parish councils (circa 250 recipients on mailing list)
Social Media (reach 764,775) Information advertising the Gypsies and Travellers DPD Regulation 18 consultation was shared across 48 posts in total, 24 on Facebook and 24 on Twitter. This had a reach of 764,775, received 130,892 impressions and 290 retweets/shares (combined with the Wiltshire Local Plan Review consultation).
Public Notice placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.
Press releases: A series of press releases were released and placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town and Parish councils along with local/regional and some national media.
Spatial Planning online events: The consultation on the Gypsies and Travellers DPD was also advertised during 17 online consultation events for the Wiltshire Local Plan Review.

- 4.10** As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website. Respondents were able to respond to the consultation via post, email or the use of online Microsoft Forms associated with each consultation paper. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post.
- 4.11** A more detailed breakdown of how consultation was undertaken and who responded can be found within the consultation report²² that was produced to document the process and findings of this consultation.

Regulation 18: Main issues raised and Council consideration

- 4.12** A summary of the main issues raised as part of the Wiltshire Gypsies and Travellers Plan consultation is provided within section 6 of the consultation report²³ published following the consultation. Further detail on how this consultation helped to shape and inform the timeline of the Plan is included within section 2 of this report, documenting the plan production timeline.
- 4.13** Summary of actions arising from the consultation:

²² [Gypsies and Travellers Development Plan Document Consultation Report \(2021\)](#)

²³ [Gypsies and Travellers Development Plan Document Consultation Report \(2021\)](#)

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

4.14 A response to each action point is set out below.

- The GTAA was updated during the preparation of the Plan, including in 2022 and most recently 2024 (with a base date of 1 April 2024). The GTAA has informed the setting of pitch targets for gypsies and travellers and plot targets for travelling showpeople in the Plan.
- Engagement with neighbouring authorities and prescribed bodies is set out in the Duty to Cooperate Statement published alongside the Regulation 19 consultation version of the Plan and has informed Plan preparation. Where appropriate, the Council will prepare Statements of Common Ground with neighbouring authorities and prescribed bodies.
- The Council effectively operates a tolerating approach to unauthorised encampments as set out on its website¹. Provision of emergency stopping sites will assist to accommodate transient groups in a safe location if they cannot be tolerated where the encampment has first occurred. In terms of private transit pitches, it would be more appropriate for site owners to apply for planning permission for one or more permanent pitches that can be occupied by visitors or family members as and when required. This need not be a fully developed pitch with a dayroom but could be simple with few facilities to enable short-term stay.
- Policy GT3 and Policy GT5 now set out the criteria proposals for new permanent sites and emergency stopping sites must meet. The criteria review is documented in the Planning Policy Criteria Review report (August 2024) and the Emergency Stopping Sites Site Selection Report (August 2024) published alongside the Regulation 19 consultation version of the Plan.
- Policy GT5 in the Plan, and its supporting text, detail the approach to planning and delivery of new emergency stopping sites. A capital budget is in place to construct the first allocated site at Thickthorn Farm GT31. Revenue budget will be identified to cover the ongoing maintenance of this site. Additional sites will be identified and delivered by 2029 in accordance with Policy GT5. The 2018 Emergency Stopping Places Strategy will be updated as necessary to include more detail on site management and maintenance.
- The Delivery Section of the Site Selection Report published alongside the Regulation 19 consultation version of the Plan contains the information on pitch deliverability and preferred products for allocated sites in Council ownership. The preferred product is long leasehold with no services. On private land allocated for new sites, it is within the landowner's gift to decide if they wish to deliver them or if they would be sold. The Council will engage with private landowners of sites (Policies GT27 and GT30) to confirm the preferred option for site delivery. Where the plan allocates additional pitches and plots at existing traveller sites some of the landowners have submitted representations in support of the respective plan policy. It is expected that additional pitches or plots can be delivered at the expense of the owner/applicant.

Conclusion

4.15 The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out within the Council's Statement of Community Involvement at the time of each consultation. A link has been provided to the summary and full reports of the main issues raised by the representations made pursuant to Regulation 18, and explanation provided of how these were taken into account in the preparation of the Gypsies and Travellers Plan. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

Appendix 2

Introduction

- 5.1** This appendix addresses the requirements of Regulation 22(1)(c)(v):
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations.
- 5.2** In July 2024, Wiltshire Council's Cabinet ([15 July 2024](#)) and Full Council ([24 July 2024](#)) approved the Wiltshire Gypsies and Travellers Development Plan Document - Pre-submission Draft for publication in line with Regulation 19. The proposed submission Regulation 19 version of the draft Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 of the TCPR for a consultation period running from Tuesday 20 August to Friday 4 October 2024. The consultation represented an opportunity for all interested parties to have their say on the proposals. This Appendix is intended to set out who was consulted and how this was undertaken alongside providing information on the response to the consultation and the main issues raised. Schedule 1 of this Appendix provides further examples of the publication/notification materials produced.
- 5.3** The information contained within this appendix explains which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations²⁴ and the Council's Statement of Community Involvement²⁵. This Appendix also sets out the number of representations made pursuant to regulation 20 whilst the report as a whole summarises the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

Regulation 19: Who was consulted and how was that undertaken?

- 5.4** In accordance with the Statement of Community Involvement²⁶ and the legislative criteria governing the regulatory stages of plan making²⁷, notifications were sent inviting comments on the draft Gypsies and Travellers Development Plan Document that included the following organisations, groups and individuals being contacted:
- Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and, Highways England)
 - Neighbouring local authorities
 - All parish and town councils

²⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012

²⁵ [Statement of Community Involvement](#), Wiltshire Council (July 2020)

²⁶ [Statement of Community Involvement](#), Wiltshire Council (July 2020)

²⁷ The Town and Country Planning (Local Planning) (England) Regulations 2012

- Wiltshire Councillors
- Individuals, community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy and the Wiltshire Gypsies and Travellers Development Plan Document.

5.5 Consultees were made aware or formally notified of the consultation through a variety of means as outlined within Table 5.1

Table 5.1 Lists various means by which consultees were made aware of the Wiltshire Gypsies and Travellers Regulation 19 consultation

Consultation method	Further information
<p>Notification email or letter sent to those on Strategic Planning mailing list (over 7000 emails or letters sent to recipients on mailing lists)</p>	<p>Notification sent to consultee's and organisations on Strategic Planning mailing list including those who have requested to be kept informed of the progress of the Gypsies and Travellers Development Plan as the plan has progressed.</p> <p>The initial notification email contained information with regards the local plan, how to respond and the availability of documents (linking to the webpage) whilst also attaching copies of both the public notice and statement of representation procedure.</p> <ul style="list-style-type: none"> • Email notification sent 14/08/2023 is provided at Schedule 1 of this Appendix.
<p>Notification letter and leaflet sent to Gypsies and Travellers, and Travelling Showpeople (over 400 letters and leaflets sent)</p>	<p>Notification sent to all sites within the County with an accompanying leaflet explaining the consultation and how to respond.</p>
<p>Inclusion within Wiltshire Council email newsletter sent to residents (over 27,000 recipients on mailing list)</p>	<p>Information advising residents of the consultation was included within newsletters sent to residents on the mailing list five times between the dates 26/07/24 and 20/09/24.</p> <ul style="list-style-type: none"> • Email newsletter sent 20/08/2024 is provided at Schedule 1 of this Appendix
<p>Inclusion within email newsletter sent to Wiltshire Council members (over 100 recipients on mailing list)</p>	<p>Information advising Wiltshire Council members of the consultation was included within newsletters sent to members on the mailing list four times between the dates 26/07/24 and 20/09/24.</p>

Consultation method	Further information
	The full list of events were contained within the emails.
Inclusion within email newsletter sent to Wiltshire town and parish councils (over 240 recipients on mailing list)	<p>Information advising Wiltshire Council town and parish councils of the consultation was included within newsletters sent to all town and parish councils three times between the dates 26/07/24 and 20/08/24.</p> <ul style="list-style-type: none"> • Email newsletter sent 20/08/24 is provided at Schedule 1 of this Appendix. The full list of events were contained within the email.
Social Media (reach 47,300)	Information advertising the consultation was shared across 21 posts in total, 12 on Facebook and 9 on X (formally Twitter) between 20/08/24 to 18/10/24. This facilitated 783 clicks to the consultation webpage and had a reach of 47,300.
Public Notice	<p>Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.</p> <ul style="list-style-type: none"> • The public notice published during week commencing 12/08/24 can be viewed at Schedule 1 of this Appendix.
Press releases	<p>A series of press releases were issued advertising the Wiltshire Gypsies and Travellers Development Plan consultation, namely:</p> <ul style="list-style-type: none"> • 25/07/2024 “Wiltshire’s Gypsies and Travellers Development Plan moves to the next stage – with public consultation to begin in August” [available to view via this link] <p>[Press release provided at Schedule 1 of this Appendix]</p> <ul style="list-style-type: none"> • 15/08/2024 “Wiltshire’s Gypsies and Travellers Development Plan Document consultation begins next week” [available to view via this link]

Consultation method	Further information
	<p>[Press release provided at Schedule 1 of this Appendix]</p> <ul style="list-style-type: none"> 20/08/2024 “Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month”[available to view via this link] <p>Each press release is placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.</p>

- 5.6** As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website and during normal office hours at the Council’s main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge). The following documents: the draft Gypsies and Travellers Development Plan Document, draft Sustainability Appraisal Report, draft Habitats Regulations Assessment and Evidence base reports were made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury. Electronic access to all submission documents was available at all Wiltshire Council libraries. Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post.
- 5.7** A statement of representations procedure (guidance note) explaining how to comment was produced for the consultation and could be viewed both online [\[available here to download\]](#) and in hard copy format at the locations referred to above. The statement of representation procedure also set out information including what the local plan was about, the period for submitting representations, the availability of documents, explanation as to the tests of soundness and how to submit comments. The representation form (produced broadly following the format recommended in the Planning Inspectorate’s procedural guidance on local plan examinations) was attached as an appendix to this guidance document whilst also being made available on the consultation website [\[available here to download\]](#) alongside hard copies being available alongside the consultation material at deposit points.
- 5.8** Respondents were able to respond to the consultation via post, email or via the Council's consultation portal. The consultation portal enabled people to view the plan electronically, both via mobile and computer, and comment directly on the part(s) of the plan they wished to comment on. Instructions on how to use the consultation portal were provided on the consultation webpage [\[available to view here\]](#). The consultation was also supported by an interactive version of the Plan created using ArcGIS StoryMaps [\[available to view here\]](#). This enabled people to view the plan alongside an interactive policy map. By navigating to a part of the plan (e.g., site allocation) users were able to view proposals in detail to understand the exact extent and location of, for instance, site allocations and proposals around a specific place.

5.9 An easy read leaflet was produced and posted to all gypsy and traveller pitches and travelling showpeople plots in Wiltshire. This simplified the main information in the Plan in the interests of clarity. The council also commissioned consultants ORS to provide support to residents on sites which included a mix of visits, a dedicated telephone number and email address. A report summarising the engagement undertaken by ORS is set out in Schedule 1 of this Statement.

Consultation events

5.10 As part of the consultation there were 5 drop-in events at libraries and leisure centres across the county. At each event there were a series of display boards (available at Schedule 1 of this Appendix) to inform attendees about the Gypsies and Travellers Development Plan Document and how to comment alongside copies of the proposed submission documents and several officers present to inform attendees about the consultation and answer any questions. A live webinar was also held on 3 September, a recording of which was made available on the Council's website and YouTube channel for those who may wish to view it back [\[available to view here\]](#).

5.11 The list of consultation events is provided in Table 5.2

Table 5.2 List of Regulation 19 consultation events and attendance

Location	Date	Sign in attendance*
Online webinar	Tuesday 3rd September	368 attending live
Salisbury (Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury, SP1 3NR)	Wednesday 4th September	8
Devizes (Devizes Library, Sheep Street, Devizes, SN10 1DL)	Thursday 5th September	26
Chippenham (Olympiad Leisure Centre, Sadlers Mead, Chippenham, SN15 3PA)	Monday 9th September	20
Royal Wootton Bassett (Royal Wootton Bassett Library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX)	Wednesday 11th September	32
Trowbridge (Atrium, County Hall, Bythesea Road, Trowbridge, BA14 8JN)	Thursday 12th September	13
*not all attendees signed in so numbers represent an underestimate of attendance		

5.12 Schedule 1 of this Appendix provides some examples of the publication/ notification materials produced.

Regulation 19: Response to consultation

5.13 A number of responses were received in relation to the consultation. Overall 658 comments were received from 448 submissions. The number of submissions broadly aligns with the number of items (e.g., an email/letter/email plus attachments/portal submission) received from consultees

(note, a consultee may have submitted multiple items amounting to multiple submissions). The number of comments represents the breakdown of these submissions, following officer analysis, against parts of the plan to which they relate. For instance, a single submission (e.g., email) from a consultee may contain comments on 5 policies within the plan amounting to 5 comments. Officer judgement was often required to allocate comments to parts of the Plan within the consultation portal given a number of responses were received by means other than via the consultation portal or the representation form.

5.14 All the comments can be viewed verbatim within the Council's consultation portal²⁸. Within the consultation portal all representations can be viewed against the part of the Gypsies and Travellers Development Plan Document to which they relate whilst also being viewable based on who submitted comments.

5.15 One petition was received as part of the consultation.

- Policy GT30: Land at Whistley Road, Potterne, with 487 signatures.

In addition, several representations were submitted on behalf of community groups including The Community of Little Somerford, Cleverton and Surrounding Area (206 people), Thickthorn and Preston Neighbourhood Group (56 people), Your Village Your Say (Rowde) and Potterne Residents.

5.16 A breakdown of the number of comments received against each part of the plan is contained within Table 5.3

Table 5.3 Provides a statistical overview of the number of comments received against each part of the plan

Part of the Plan	Number of comments received
Introduction	49
What is the Plan?	16
How to use this Plan?	4
How has the Plan been prepared?	11
Next Steps	3
Objectives	10
Strategy for Meeting Traveller Needs	7
Policy GT1: Meeting the needs of gypsies and travellers, and travelling showpeople	9
Policy GT2: Safeguarding gypsies and travellers, and travelling showpeople sites	12
Policy GT3: New sites and intensification of existing sites	23
Policy GT4: Meeting needs of gypsies and travellers for culturally appropriate accommodation	2
Policy GT5: Emergency Stopping Sites	6
Site Allocations	12

²⁸ Available via [the council's consultation portal](#)

Part of the Plan	Number of comments received
Site Intensification	10
Policy GT6: Braemar and Braemar (2)	3
Policy GT7: Calcutt Park	5
Policy GT8: Dillons Farm	3
Policy GT9: Easton Lane	8
Policy GT10: Lansdowne	2
Policy GT11: Oak Tree Field	2
Policy GT12: Poplar Tree Residential Park	3
Policy GT13: The Poplars	2
Policy GT14: Rose Field Caravan Site, Hullavington	0
Policy GT15: Land South of Bridge Paddocks	3
Travelling Showpeople	0
Policy GT16: Land opposite the Laurels	1
Policy GT17: Land adjacent Nursteed Park	1
Policy GT18: Petersfinger Business Park	6
Site Allocations to meet pitch needs from households that do not meet the planning definition	1
Policy GT19: Former Glenville Nurseries	1
Policy GT20: Greenfield View, Leigh	3
Policy GT21: Land at Capps Lane	3
Policy GT22: Melbourne View	2
Policy GT23: 79 Southampton Road	3
New Site Allocations	5
Policy GT24: Bushton Farm North	16
Policy GT25: Land at Housecroft Farm (1)	32
Policy GT26: Land at Housecroft Farm (2), Edington Road, Edington	41
Policy GT27: Land at Cleverton, Cleverton	29
Policy GT28: Land at Oxhouse Farm, Rowde	58
Policy GT29: Land at Upper Seagry Farm, Upper Seagry	113
Policy GT30: Land at Whistley Road, Potterne	95
Emergency Stopping Site	4
Policy GT31: Land at Thickthorn Farm, Preston Lane, Lyneham	6

Part of the Plan	Number of comments received
Monitoring and Implementation	2
Appendix 1: Glossary	0
Appendix 2: Changes to Policies Map - Safeguarded Sites identified in Policy GT2	0
Sustainability Appraisal	31

Regulation 19: Main issues raised and Council response

5.17 A summary of the main issues raised in response to the consultation is contained within Section 3 of this report²⁹. More comprehensive tables of key issues have also been provided within Schedule 2 of this Appendix summarising key elements of what stakeholders have said against each part of the Plan. These more detailed key issues are intended to provide a little more information about what consultees have said against each part of the plan and have informed the formulation of the main issues. For the key issue tables contained at Schedule 2, every effort has been made to include information on who has raised each issue to provide further context.

Schedule 1: Extracts of Regulation 19 consultation advertisement

5.18 Schedule 1 of Appendix 2 contains some extracts of the advertisement material produced as part of undertaking the Regulation 19 consultation and the consultants report detailing activity undertaken directly with the Gypsy and Traveller community. Schedule 1 contains the following information:

1. Notification email sent 14/08/2024 to those on Strategic Planning mailing list
2. Residents email newsletter sent 20/08/2024
3. Town and Parish Council email newsletter sent 20/08/2024
4. Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 12/08/2024
5. Press release published 25/07/2024 "Wiltshire's Gypsies and Travellers Development Plan moves to the next stage - with public consultation to begin in August"
6. Press release published 15/08/2024 "Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week"
7. Press release published 20/08/2024 "Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month"
8. Display boards available at 5 drop in events held within Wiltshire
9. Regulation 19 consultation report by consultants ORS (including leaflet shared with the gypsy and traveller community)

²⁹ In accordance with the requirements to provide a summary of the main issues made pursuant to regulation 20 as per Regulation 22 (1)(c)(v)

Notification email sent 14/08/2024 to those on Strategic Planning mailing list

Consultation on the pre-submission draft Gypsies and Travellers Development Plan Document

Wiltshire Council has published the draft Gypsies and Travellers Development Plan Document (DPD) along with accompanying evidence reports, for formal consultation. The Gypsies and Travellers DPD sets out the vision and framework to allocate land for Gypsies and Travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036 (since revised to 2038), in line with Government planning policy and legislation. Once adopted, relevant planning applications will be determined against the Plan, making it an important document in meeting accommodation need for Gypsy and Traveller communities in Wiltshire.

Comments are invited on the Gypsies and Travellers DPD and supporting evidence base documents during the consultation period, which runs from **9am on Tuesday 20th August to 5pm on Friday 4th October 2024**.

In-person events are being held across the county on selected dates from Wednesday 4th September to Thursday 12th September to enable you to find out more information as part of the consultation. You can just turn up to the in-person events, there is no need to book. There will also be an online webinar event on Tuesday 3rd September, however you must register beforehand to attend the online event. To see the full list of in-person events or to register for the online webinar event, see <https://www.wiltshire.gov.uk/planning-gypsy-travellers>. Officers will be available during all sessions to answer questions about the Gypsies and Travellers DPD and we would encourage people to attend and find out more about what the DPD proposes in their area.

How to respond

The Gypsies and Travellers DPD and supporting evidence documents are available to view and download at <https://www.wiltshire.gov.uk/planning-gypsy-travellers> from 9am on Tuesday 20th August, and people can also download a representation form and a simplified guidance note from this page.

We welcome your comments via the following means:

- Online via the council's dedicated consultation portal: <http://consult.wiltshire.gov.uk/portal>. This is the most efficient and effective way to make representations. Further information on how to use the portal can be found at www.wiltshire.gov.uk/local-plan
- By email using the representation form available at <https://www.wiltshire.gov.uk/planning-gypsy-travellers> and returned to strategicplanning@wiltshire.gov.uk
- By post in writing by completing a representation form and submitting this to:

Strategic Planning
Planning Directorate
Wiltshire Council
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN.

Please note that copies of all comments (including your personal details) will be made available for the public to view and therefore cannot be treated as confidential. Anonymous representations cannot be accepted.

Copies of all the consultation documents can be viewed during normal opening hours at the Council's main offices at Monkton Park in Chippenham, Bourne Hill in Salisbury, and County Hall in Trowbridge.

The following documents: the draft Gypsies and Travellers Development Plan Document, draft Sustainability Appraisal Report, draft Habitats Regulations Assessment and Evidence base reports will be made available to view at the following libraries during normal opening hours:

- Amesbury Library, Smithfield Street, Amesbury, SP4 7AL
- Bradford on Avon Library, Bridge Street, Bradford on Avon, BA15 1BY
- Calne Library, The Strand, Calne, SN11 0JU
- Chippenham Library, Timber Street, Chippenham, SN15 3EJ
- Springfield Community Campus, Beechfield Road, Corsham, SN13 9DN
- Devizes Library, Sheep Street, Devizes, SN10 1DL
- Malmesbury Library, 24 Cross Hayes, Malmesbury, SN16 9BG
- Marlborough Library, 91 High Street, Marlborough, SN8 1HD
- Melksham Community Campus, Market Place, Melksham, SN12 6ES
- Pewsey Library, Aston Close, Pewsey, SN9 5EQ
- Royal Wootton Bassett Library, Borough Fields, Royal Wootton Bassett, SN4 7AX
- Salisbury Library, Market Walk, Salisbury, SP1 1BL
- Tidworth Library, Tidworth Leisure Centre, Nadder Road, Tidworth, SP9 7QA

- Tisbury Library, Nadder Community Campus, Tisbury, SP3 6HJ
- Trowbridge Library, County Hall, Bythesea Road, Trowbridge, BA14 8JN
- Warminster Library, Three Horseshoes Walk, Warminster, BA12 9BT
- Westbury Library, Westbury House, 15 Edward Street, Westbury, BA13 3BD

Information on library opening times can be found at:

<https://apps.wiltshire.gov.uk/librariesinformation>. Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Following the consultation, the council will consider the comments received before submitting the Gypsies and Travellers DPD and supporting evidence to the Secretary of State for examination. All comments received during this consultation will be passed on to the appointed independent Planning Inspector at that stage.

Any representation received may be accompanied by a request to be notified at a specific address of any of the following: that the Gypsies and Travellers DPD has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the DPD has been published; and that the Gypsies and Travellers DPD has been adopted.

Should you require further information, please email: strategicplanning@wiltshire.gov.uk or call 01225 713223.

If you no longer wish to receive emails to do with the Gypsies and Travellers Development Plan Document, please let us know by emailing strategicplanning@wiltshire.gov.uk

Strategic Planning Services

Wiltshire Council

Email: strategicplanning@wiltshire.gov.uk

Gypsies and Travellers Development Plan Document consultation webpage:
<https://www.wiltshire.gov.uk/planning-gypsy-travellers>



20 August 2024



Gypsies and Travellers Development Plan consultation begins today, with engagement events to start next month

You can now have your say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable you to find out more about the Development Plan Document and ask questions, we are holding five engagement events at different locations around the county in September where you can drop-in to find out more, and one online engagement event.

You can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on our website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many of our libraries.

You can share your views through our online portal, and anyone without internet access can visit a library to use the computers, or contact us to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues you can comment on will be available on our website.

The list of engagement events is as follows. You can just turn up at any time during the in-person events, which are drop-in sessions – there is no need to book. However, if you wish to attend the online event, you must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events – they do not need to choose the one nearest to them.

Event	Date	Time	Location
General information webinar	Tuesday 3 September	6pm-7.30pm	Online
Salisbury	Wednesday 4 September	4.30pm-7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Devizes	Thursday 5 September	4.30pm-7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
Chippenham	Monday 9 September	4.30pm-7pm	Olympiad Leisure Centre, Sadlers Mead, Chippenham SN15 3PA
Royal Wootton Bassett	Wednesday 11 September	4.30pm-7pm	Royal Wootton Bassett library, 11 Borough Fields, Royal Wootton Bassett SN4 7AX
Trowbridge	Thursday 12 September	4.30pm-7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

Find out more, take part in the consultation and sign up for the engagement event

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20 August 2024



Gypsies and Travellers Development Plan consultation begins today, with engagement events to start next month

Your communities can now have their say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable people to find out more about the Development Plan Document and ask questions, we are holding five engagement events at different locations around the county in September where you can drop-in to find out more, and one online engagement event.

People can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on our website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many Wiltshire Council libraries.

Anyone can share their views through our online portal, and anyone without internet access can visit a library to use the computers, or contact us to get a written copy of the representation form and find out how to view the documents.

Information about what types of issues people can comment on will be available on our website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions – there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events – they do not need to choose the one nearest to them.

Event	Date	Time	Location
General information webinar	Tuesday 3 September	6pm-7.30pm	Online
Salisbury	Wednesday 4 September	4.30pm-7pm	Five Rivers Health and Wellbeing Centre, Hulse Road, Salisbury SP1 3NR
Devizes	Thursday 5 September	4.30pm-7pm	Devizes Library, Sheep Street, Devizes SN10 1DL
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Trowbridge	Thursday 12 September	4.30pm-7pm	Atrium, County Hall, Bythesea Road, Trowbridge BA14 8JN

[Find out more, take part in the consultation and sign up for the engagement event](#)



Public notices placed within local newspapers (Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald) during week commencing 12/08/2024

Wiltshire Gypsies and Travellers Development Plan Document

**Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012
(Regulation 19)**

The Environmental Assessment of Plans and Programmes Regulations 2004

Notice of Publication of the draft Wiltshire Gypsies and Travellers Development Plan Document

Notice is hereby given that Wiltshire Council has published the draft Wiltshire Gypsies and Travellers Development Plan Document ("the draft Plan") for a formal consultation period beginning on **Tuesday 20th August 2024** during which representations may be made.

Following consultation, the Council will register and consider the comments received before submitting the draft Plan to the Secretary of State for Housing, Communities and Local Government.

The draft Plan addresses the accommodation needs of Wiltshire's travelling communities to 2038 and updates Core Policy 47 'Meeting the needs of Gypsies and Travellers' of the Wiltshire Core Strategy. The draft Plan contains policies that collectively make provision for the permanent and temporary accommodation needs of the travelling community. These include policies allocating new sites and existing sites for additional pitches and plots. The draft Plan also safeguards existing sites so that they can continue to meet on-site needs in the longer term.

The proposed submission documents include: the draft Plan, the draft Sustainability Appraisal report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004), the draft Habitat Regulations Assessment and a number of other supporting documents that form part of the evidence base for the draft Plan.

The period for submitting representations relating to the draft Plan begins **9am Tuesday 20th August 2024** and closes at **5pm on Friday 4th October 2024**. Representations received beyond this date may not be considered. A statement of the representations procedure (guidance note) explaining how to comment can be viewed alongside the proposed submission documents. Please note that copies of all comments (including your personal details) will be made available for the public to view, and therefore cannot be treated as confidential. Anonymous comments cannot be accepted.

The proposed submission documents can be viewed on the Council's website at: www.wiltshire.gov.uk/planning-gypsy-travellers and during normal office hours at the Council's main offices: Monkton Park (Chippenham), Bourne Hill (Salisbury) and County Hall (Trowbridge).

The following documents: the draft Plan; the draft Sustainability Appraisal Report (incorporating requirements of the Environmental Assessment of Plans and Programmes Regulations 2004); the draft Habitat Regulations Assessment, and various evidence base reports will be made available to view at the following libraries during normal opening hours: Amesbury, Bradford on Avon, Calne, Chippenham, Corsham, Devizes, Malmesbury, Marlborough, Melksham, Pewsey, Royal Wootton Bassett, Salisbury, Tidworth, Tisbury, Trowbridge, Warminster, and Westbury.

Electronic access to all submission documents will be available at all Wiltshire Council libraries.

Representations can be submitted via the following means:

- online via the Council's consultation portal accessible via this link: www.wiltshire.gov.uk/planning-gypsy-travellers
- by email using the form available at: www.wiltshire.gov.uk/planning-gypsy-travellers and returned to <mailto:strategicplanning@wiltshire.gov.uk>; or
- by post in writing to: Strategic Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN.

The form has an accompanying statement of the representations procedure (guidance note) to assist in its completion. Please use a separate form for each representation you wish to make.

Address details will not be made publicly available. All personal data will be handled in line with the council's Strategic Planning privacy policy. You can view the Council's privacy notice at <https://www.wiltshire.gov.uk/planning-privacy-notice>.

Any representation may be accompanied by a request to be notified at a specified address (email/postal) of any of the following: that the draft Plan has been submitted to the Secretary of State for independent examination; that the Inspector's Report (including any recommendations) into the draft Plan has been published; and that the draft Plan has been adopted.

There will be a general information live webinar on Tuesday 3rd September 2024 at 6:00pm to 7.30pm and five drop-in events held around the county where you can ask questions and gain further information about the consultation. More information on these events can be found at: www.wiltshire.gov.uk/planning-gypsy-travellers

If you require more information or would like to request copies of documents, please contact Strategic Planning via email (<mailto:strategicplanning@wiltshire.gov.uk>), phone (01225 713223) or post to Strategic Planning, Planning Directorate, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

Nic Thomas

Director of Planning

Press release published 25/07/2024 "Wiltshire's Gypsies and Travellers Development Plan moves to the next stage - with public consultation to begin in August"

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

Wiltshire's Gypsies and Travellers Development Plan moves to the next stage - with public consultation to begin in August

Following its approval at Wiltshire Council's Cabinet meeting last week and yesterday's Full Council meeting (Wednesday 24 July), Wiltshire's Gypsies and Travellers Development Plan will now move to the next public consultation stage.

Published 25 July 2024

The Regulation 19 public consultation begins on Tuesday 20 August until 5pm on Friday 4 October. To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county and one online engagement event.

Wiltshire Council, like all Local Planning Authorities, must plan for all members of the community, including Gypsies and Travellers. It must make provision to meet the accommodation needs of travellers, which includes Gypsies, Travellers and travelling showpeople, including the allocation of sites in development plans to meet this need.

The Development Plan Document, which is based on robust evidence, sets out how it will provide pitches for Gypsies and Travellers over the plan period, from 2024-2038.

CLr Nick Botterill, Cabinet Member for Strategic Planning, said: "Wiltshire Council is meeting its statutory obligations in planning for all members of the community, and that includes the Gypsy and Traveller communities."

"Wherever possible, the provision of additional pitches is on existing Gypsy and Traveller sites. Elsewhere, seven potential new sites have been proposed, five of which are on Wiltshire Council land."

"All of the allocations have been selected taking account of the availability of sites as well their proximity to local facilities. This information can be read on our website. I would strongly urge anyone interested to attend the engagement events and have their say once the consultation starts in August."

Once adopted, the Plan will sit alongside the Wiltshire Local Plan review. Together they will form the Local Plan for Wiltshire and complete the update of the Wiltshire Core Strategy. If found sound by the Inspector, the Plan would be adopted later in 2025.

The list of engagement events is as follows. People can just turn up at the in-person events - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

To find out more and to sign up for the online engagement event, people should go to www.wiltshire.gov.uk/planning-gypsy-travellers

Town	Date	Time	Location
General information webinar	Tuesday 3 September	6pm-7.30pm	Online
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Press release published 15/08/2024 "Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week"

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

Wiltshire's Gypsies and Travellers Development Plan Document consultation begins next week

In just a few days people in Wiltshire will be able to take part in the Gypsies and Travellers Development Plan Document consultation and have their say on the proposals.

Published 15 August 2024

The Regulation 19 public consultation begins on Tuesday 20 August and runs until 5pm on Friday 4 October. To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county and one online engagement event.

The council has a statutory obligation to plan for all members of the community, including Gypsies and Travellers, and the draft Development Plan Document sets out how their housing needs will be provided for over the plan period, from 2024-2038.

Many of the required pitches and plots will be on existing Traveller sites, and once the plan is adopted, they would be subject to further consultation as part of the planning application process to help ensure proposals are brought forward in the right way.

Cllr Nick Botterill, Cabinet Member for Strategic Planning, said: "The council is planning for all members of the community here in Wiltshire and our Business Plan commits to seek to improve health outcomes for the Gypsy, Roma and Traveller communities."

"Meeting the housing needs of this community is a key part of why the draft Gypsies and Travellers Development Plan Document, which looks ahead to 2038, has been prepared."

"I'd urge people to take part in the consultation when it begins on Tuesday 20 August and let us know their views."

"Everyone is welcome to attend our engagement events and sign up for our online webinar to find out more."

Following the public consultation and consideration of all comments received, it is anticipated that the Plan will go to Cabinet and Full Council again in December. It will then be submitted for examination by an independent Planning Inspector appointed by the Government, who will consider all comments received on the Plan. If found sound by the Inspector, it is anticipated the Plan will be adopted later in 2025.

Information about what types of issues people can comment on will be provided on the council's website.

The list of engagement events is as follows. People can just turn up at any time during the in-person events, which are drop-in sessions - there is no need to book. However, anyone who wishes to attend the online event must sign up beforehand. Anyone with an interest in the Plan can attend any of the in-person events - they do not need to choose the one nearest to them.

To find out more and sign up for the engagement event, people should go to www.wiltshire.gov.uk/planning-gypsy-travellers.

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Press release published 20/08/2024 "Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month"

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

Gypsies and Travellers Development Plan Document consultation begins today, with engagement events to start next month

Published 20 August 2024

People in Wiltshire can now have their say on the Gypsies and Travellers Development Plan Document, as the consultation begins today (Tuesday 20 August) until 5pm on Friday 4 October.

To enable people to find out more about the Development Plan Document and ask questions, the council is holding five engagement events at different locations around the county in September where people can drop-in to find out more, and one online engagement event.

CLlr Nick Botterill, Cabinet Member for Strategic Planning, said: "The draft Gypsies and Travellers Development Plan Document sets out how we propose to plan growth for the housing needs of Gypsies, Travellers and travelling showpeople in Wiltshire up to 2038.

"At this stage in the process, it's very important that we get feedback and comments from everyone with an interest in the plan. To enable people to ask questions and find out more, we are holding five in-person drop-in engagement events and one online, and people can sign up for the online event now - there is no need to sign up for the in-person events ahead of time."

Wiltshire Council, like all Local Planning Authorities, must plan for all members of the community, including Gypsies and Travellers. It must make provision to meet the accommodation needs of travellers, which includes Gypsies, Travellers and travelling showpeople, including the allocation of sites in development plans to meet this need.

People can read the Gypsies and Travellers Development Plan Document and supporting consultation documents on the council's website and at the main council offices at County Hall, Trowbridge, Monkton Park, Chippenham, and Bourne Hill, Salisbury. The plan will also be available in many Wiltshire Council libraries.

People can share their views through the council's online portal, and anyone without internet access can visit a library to use the computers, or contact the council to get a written copy of the representation form and find out how to view the documents.

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Find out more and sign up for the engagement event [Regulation 19 consultation summer 2024](#).

Event	Date	Time	Location
General information webinar	Tuesday 3 September	6pm-7.30pm	Online
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Gypsies and Travellers Development Plan Document

Consultation



What is the Gypsies and Travellers Plan and why are we doing it?

National planning policy requires councils to plan for the accommodation needs of all groups within the community, including travellers. The aim is to ensure fair and equal treatment of travellers in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. In summary, authorities are required to:

- Assess the permanent and temporary accommodation needs of travellers.
- Identify land in the right locations to meet need through sustainable development.
- Address unauthorised encampments.
- Reduce tensions between traveller and settled communities in plan-making and decision taking.

The Gypsies and Travellers Development Plan Document sets out Wiltshire Council's strategic planning policies for meeting the accommodation needs of gypsies and travellers and travelling showpeople.

It will replace 'Core Policy 47: Meeting the needs of Gypsies and Travellers' of the Wiltshire Core Strategy (adopted January 2015).

The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. Together both plans will update the Wiltshire Core Strategy in full and guide the determination of planning applications within Wiltshire; except for the small part in the New Forest National Park.

The Plan has been prepared in accordance with national planning policy. It is based on robust evidence in the form of a Gypsy and Traveller Accommodation Assessment (GTAA) to establish the accommodation needs of Wiltshire's travelling community across the plan period from 1 April 2024 to 31 March 2038. The GTAA considers the need for transit provision and permanent accommodation within the plan area.

Wiltshire Council

While this Plan is the starting point when determining planning applications for traveller sites, all other relevant policies within the development plan and national policy will be taken into account, along with other material considerations.

The following four objectives have been developed for the Plan:

Objective 1:

To meet identified accommodation needs for Gypsies and Travellers pitches and travelling showpeople plots to 2038 through site allocations, broad locations for growth and a policy framework for assessing proposals.

Objective 2:

To make provision for three council-managed emergency stopping places to provide temporary accommodation.

Objective 3:

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

Objective 4:

To set out the approach to meeting needs for culturally appropriate accommodation for Gypsies and Travellers that do not meet the planning definition.



Table 1: Pitch need for Gypsies and Travellers meeting the planning definition

Year period	0-5	6-10	11-14	Plan period
Dates	2024-29	2029-34	2034-38	2024-2038
Pitch need	81	25	22	128

How many pitches and plots are needed?

There are 85 sites with around 380 pitches and plots for Gypsies and Travellers and travelling showpeople in Wiltshire. The majority are authorised private sites for Gypsies and Travellers. There are also three sites with 50 pitches for gypsies and travellers that are owned and managed by Wiltshire Council.

The GTAA identifies for the plan period – 1 April 2024 to 31 March 2038 – the need for 128 Gypsy and Traveller pitches for households that meet the planning definition comprising:

- 60 concealed or doubled-up households or single adults
- 11 households on unauthorised developments
- 4 from in migration/roadside
- 6 households living in bricks and mortar
- 47 from future household formation

For travelling showpeople, a need for 9 plots has been identified over the plan period comprising:

- 8 from concealed households
- 1 from future household formation

It also identifies that 54 teenagers may need accommodation of their own in the next five years but that this could be met by siting additional caravans on family sites.

Tables 1 and 2 shows that most need is within the first five years of the plan period. In line with national policy, the plan needs to provide sites allocations to ensure that need in the first 5 years of the plan can be met and policies to address need across the remainder of the plan period.

As there are no transit sites in Wiltshire the GTAA also identifies the need for three emergency stopping sites in the north, south and west of Wiltshire to provide a network of sites.

Table 2: Plot need from travelling show people meeting the planning definition

Year period	0-5	6-10	11-14	Plan period
Dates	2024-29	2029-34	2034-38	2024-2038
Plot need	8	0	1	9

What policies does the plan include?

There are 31 policies in total that collectively deliver the plan objectives, as follows:

Policy GT1 sets out the target numbers of pitches and plots to be provided over the period and the type of sites to address this.

Policy GT2 safeguards sites and exceptionally allows for additional provision on existing sites for travellers that do not meet the planning definition.

Policy GT3 sets out criteria for new sites and intensification of existing sites.

Policy GT4 sets out the approach to meeting needs of ethnic gypsies or travellers who do not meet the planning definition as they have never travelled.

Policy GT5 sets out criteria for emergency stopping sites to be provided by the council.

Policies GT6 to GT31 set out policies for individual site allocations.

Consistent with national policy, the Plan focuses on addressing the accommodation needs of gypsies and travellers and travelling showpeople who meet the following definitions:

Gypsies and travellers

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Travelling showpeople

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

What sites have been allocated?

Table 1: Allocations for site intensification (planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers			
Policy GT6	Braemar	5	Salisbury
Policy GT7	Calcutt Park	1	Cricklade
Policy GT8	Dillions Farm	1	Grimstead
Policy GT9	Easton Lane	3	Corsham
Policy GT10	Lansdowne	7	Seminaton
Policy GT11	Oak Tree Field	14	Briford
Policy GT12	Poplar Tree Residential Park	7	Southwick
Policy GT13	The Poplars	2	Dilton Marsh
Policy GT14	Rose Field Caravan Site	2	Hullavington
Policy GT15	Land to the South of Bridge Paddocks	2	Purton
Total		44	
Travelling showpeople			
Policy GT16	Land Opposite the Laurels	3	North Bradley
Policy GT17	Land adjacent Nursteed Park	4	Devizes
Policy GT18	Petersfinger Business Park	1	Clarendon Park
Total		8	

Table 2: Allocations for site intensification (do not meet planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers			
Policy GT19	Former Glenville Nurseries	1	Royal Wootton Bassett
Policy GT20	Greenfield View	1	Cricklade
Policy GT21	Land at Capps Lane	1	Bratton
Policy GT22	Melbourne View	1	Great Somford
Policy GT23	79 Southampton Road	2	Clarendon Park
Total		6	

Table 3: New site allocations (planning definition)

Policy number in the Plan	Name of site	New pitches	Parish
Gypsy/Travellers			
Policy GT24	Bushton North Farm, Bushton	3	Royal Wootton Bassett
Policy GT25	Housecroft Farm 1, Edington	2	Edington
Policy GT26	Housecroft Farm 2, Edington	2	Edington
Policy GT27	Land at Cleverton, Cleverton	10	Lea and Clevedon
Policy GT28	Oxhouse Farm, Rowde	10	Rowde
Policy GT29	Upper Seagry Farm, Upper Seagry	5	Seagry
Policy GT30	Whistley Road, Potterne	2	Potterne
Total		34	

How do I respond?

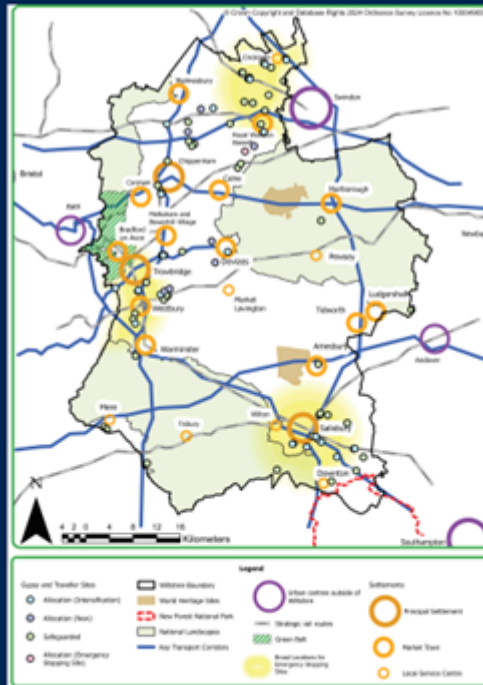
The Council has published the Plan so that you can make comments on it before it is submitted for examination by a government appointed Planning Inspector.

Comments can be submitted online via the Council's consultation portal accessible via this link or via the QR code:

www.wiltshire.gov.uk/planning-gypsy-travellers

The purpose of the examination is to see whether the plan meets the test of soundness defined in the National Planning Policy Framework (NPPF) and in particular whether the plan is positively prepared, justified, effective and consistent with national policy and meets all the relevant legislative requirements.

Wiltshire key diagram including overview of allocated sites:



Please consider the following questions:

1. Is the Plan positively prepared?
2. Is the Plan justified?
3. Is the Plan effective?
4. Is the Plan consistent with national policy?

The consultation begins at 9am on Tuesday 20 August 2024 and closes at 5pm on **Friday 4 October 2024**. Representations received beyond this date may not be considered. To make representations and to read the Gypsies and Travellers Development Plan Document and supporting documents, please go to:

www.wiltshire.gov.uk/planning-gypsy-travellers

The above webpage also contains information on how to comment. Please note we cannot accept anonymous representations, as we must ensure that the names of people who make a representation can be made available and be taken into account by the Planning Inspector at the examination.

Anyone without internet access can visit their local library to view documents online. Hard copies of all documents are available in the Council's main offices and some libraries.

If you would like more information or would like to request copies of the documents, please contact Strategic Planning via email (strategicplanningpolicy@wiltshire.gov.uk), phone (01225 713223) or post to Planning, Wiltshire Council, County Hall, Bythesea Road, Trowbridge, Wiltshire, BA14 8JN. Please note that there will be a fee for providing any documents requested.

Next steps

After the Regulation 19 consultation period, the council will consider the response to the consultation before submitting the Plan, accompanying evidence, and all representations received to the Secretary of State who will appoint a Planning Inspector to undertake independent examination. This submission is anticipated to take place in early 2025 with the examination and hearings anticipated to take place following this.



Scan me to
have your say



Wiltshire Council



Wiltshire Gypsies and Travellers
Development Plan Document
Pre-Submission Draft
(Regulation 19) Consultation

November 2024



Opinion Research Services, The Strand, Swansea SA1 1AF

Steve Jarman, Michael Bayliss, Elliot Muldoon, Hanna Lloyd, Jonathan Lee and Nigel Moore

Enquiries: 01792 535300 · info@ors.org.uk · www.ors.org.uk

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1. SUMMARY

- ^{1.1} Between Tuesday 20th August and Friday 4th October 2024 Wiltshire Council completed a Regulation 19 Consultation on their Gypsies and Travellers Development Plan Document (DPD).
- ^{1.2} As part of the consultation process the Council prepared information that set out the reasons for the consultation and the proposed site and yard allocations that they were including in the DPD to meet need that had been identified in the Gypsy and Traveller Accommodation Assessment (GTAA) that was completed by ORS.
- ^{1.3} As well as communicating widely with the settled community, an easy read leaflet, Statement of Representation Procedure and a copy of the representation form was sent by the Council to all known Gypsy and Traveller sites and Travelling Showpeople yards in Wiltshire prior to the consultation commencing on 20th August 2024.
- ^{1.4} To maximise engagement with the Gypsy and Traveller and Travelling Showpeople communities, the Council engaged the services of ORS to support the Regulation 19 consultation process.
- ^{1.5} The purpose of the engagement that was completed by ORS was to seek to encourage members of the Travelling Community living on sites and yards in Wiltshire to engage with and respond to the DPD consultation process.
- ^{1.6} The Council agreed a list of sites and yards to be visited by ORS and also provided additional consultation materials including copies of the DPD, Statement of Representation Procedure and Representation Forms as well as additional easy read leaflets to support the engagement.
- ^{1.7} The focus of the site and yard visits agreed between ORS and the Council was to engage with site/yard owners and residents on existing sites/yards which were allocated for intensification in the DPD.
- ^{1.8} To prioritise the resource provided by ORS, the Council provided additional support through its Housing Management Team for the Council run sites.
- ^{1.9} Further support was provided by the site management company for two of the commercial run sites.
- ^{1.10} Access was provided to both a dedicated ORS email address and telephone number for any enquiries from the Gypsy and Traveller or Travelling Showpeople sites across Wiltshire who needed support.
- ^{1.11} The Council also offered an online webinar and five face-to-face consultation sessions around the County which anyone was able attend.
- ^{1.12} A copy of the easy read consultation leaflet can be found in **Appendix A**.
- ^{1.13} The allocations that were proposed in the DPD were on a total of 25 Gypsy and Traveller sites or Travelling Showpeople yards, out of which 18 were existing sites/yards proposed for additional pitches or plots, and 7 new sites for Gypsy and Traveller pitches.

^{1.14} During the course of the consultation period ORS attempted to visit each of the 18 existing sites and yards up to 3 times to engage with site/yard owners/residents to explain the DPD process and to encourage them to respond to the Regulation 19 Consultation. Where owners/residents were unable to complete the consultation response form themselves ORS provided assistance or completed the form on their behalf.

^{1.15} ORS were able to visit all of 18 of the existing sites and yards where allocations have been made in the DPD and a summary out the outcomes of these visits can be found in the table below.

Figure 1 – Sites and Yards Visited in Wiltshire (August-October 2024)

DPD Policy	Site/Yard Name	Outcome
GT6	Braemar and Braemar 2	DPD Consultation Form was completed by ORS and posted back to the Council. The site owners need the pitches for children in the future.
GT7	Calcutt Park	ORS spoke to owner of the site who said they will complete the DPD Consultation Form and return it to the Council as a pitch is needed for a child who is getting married.
GT8	Dillons Farm	Owner was given a DPD Consultation Form by ORS to complete and they said they would return it to the Council.
GT9	Easton Lane (Notton Stables, Notton Park)	DPD Consultation Form was completed by ORS and posted back to the Council.
GT10	Lansdowne	DPD Consultation Form was completed by ORS and posted back to the Council.
GT11	Oak Tree Field	The site owner is going to complete DPD Consultation Form online for this site and for Dairy House Bridge.
GT12	Poplar Tree Residential Park	DPD Consultation Form was completed by ORS and posted back to the Council.
GT13	The Poplars	ORS spoke to owner of the site who will complete the DPD Consultation Form and return it to the Council
GT14	Rose Caravan Site	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.
GT15	Land to the South of Bridge Paddocks	Form was completed by ORS and posted back to the Council.
GT16	Land opposite the Laurels	Site owners are going to go online to complete the DPD Consultation Form.
GT17	Land adjacent Nursteed Park	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.

GT18	Petersfinger Business Park (The Dormers)	Site owners were given the DPD Consultation Form by ORS. They will complete once they have spoken with their Planning Agent.
GT19	Former Glenville Nurseries	Contact details for the DPD Consultation were left with the site owner as they were unable to complete them when ORS visited the site.
GT20	Greenfield View	DPD Consultation Form was completed by ORS and posted back to the Council.
GT21	Land at Capps Lane (Shellbrooke View)	Site owners are going to go online to complete the DPD Consultation Form.
GT22	Melbourne View	ORS spoke to owner on the phone as they were away. They will complete the DPD Consultation Form when they return.
GT23	79 Southampton Road	Site owners are going to go online to complete the DPD Consultation Form.

^{1.16} In addition an ORS email address was included on the consultation leaflet. During the course of the consultation period no responses were received.

^{1.17} Finally, telephone details for ORS were included in the consultation leaflet but no incoming calls were received other than to arrange suitable times to visit sites or yards.

Appendix A – Consultation Leaflet

What are the council consulting on?

Wiltshire Council is consulting on the Gypsies and Travellers Development Plan Document. It sets out how and where new gypsy/traveller pitches and travelling showpeople plots will be met between 2024 and 2038.

The consultation starts on Tuesday 20 August 2024 and ends on Friday 4 October 2024.

What will the Plan do?

The Plan proposes 76 pitches for Gypsies and Travellers and 8 showpeople plots. Together with existing planning permissions this will meet the need for the first five years of the plan, which is 81 pitches for gypsies and travellers and 8 plots for travelling showpeople.

The Plan also contains policies that set out how the need for pitches and plots will be met for the rest of the Plan, to 2038.

It also identifies 6 additional pitches for travellers on existing sites that are protected by equality law but do not meet the planning definition. New sites for culturally appropriate accommodation will be considered against normal housing policies.

The Plan also protects existing lawful traveller sites to ensure a supply of sites into the future and, subject to permission, will allow additional caravans on existing sites to meet need from teenagers.

What sites have been allocated?

For households that meet the planning definition of Gypsy, Traveller or travelling showpeople, 44 pitches and 8 plots are proposed on existing sites.

This is set out in the table below:

Policy number in the Plan	Name of site	New pitches
Gypsy/Travellers		
Policy GT6	Breamer	5
Policy GT7	Calcutt Park	1
Policy GT8	Dillons Farm	1
Policy GT9	Easton Lane	3
Policy GT10	Lardowne	7
Policy GT11	Oak Tree Field	14
Policy GT12	Poplar Tree Residential Park	7
Policy GT13	The Poplars	2
Policy GT14	Rose Field Caravan Site	2
Policy GT15	Land to the South of Bridge Paddocks	2
Total		44
Travelling showpeople		
Policy GT16	Land Opposite the Laurels	3
Policy GT17	Land adjacent Nursted Park	4
Policy GT18	Fensniffer Business Park	1
Total		8

There are 6 pitches for travellers that are protected by equality law but do not meet the planning definition, as shown in this table:

Policy number in the Plan	Name of site	New pitches
Gypsy/Travellers		
Policy GT19	Former Glenville Nurseries	1
Policy GT20	Greenfield View	1
Policy GT21	Land at Capps Lane	1
Policy GT22	Melbourne View	1
Policy GT23	79 Southampton Road	2
Total		6

34 additional pitches for Gypsies and Travellers are allocated on new sites in Wiltshire for households that do meet the planning definition. This is shown in this table:

Policy number in the Plan	Name of site	New pitches
Gypsy/Travellers		
Policy GT24	Buston North Farm, Buston	3
Policy GT25	Housecroft Farm 1, Edington	2
Policy GT26	Housecroft Farm 2, Edington	2
Policy GT27	Land at Cleverton, Cleverton	10
Policy GT28	Dihouse Farm, Rowde	10
Policy GT29	Upper Seagry Farm, Upper Seagry	5
Policy GT30	Whistley Road, Pottesme	2
Total		34

The Plan also allocates a site at Thickthorn Farm, Lyneham for a 6 pitch Emergency Stopping Site and commits to two further sites in the south and west of Wiltshire.


Gypsies and Travellers Development Plan - Consultation

Wiltshire Council is working on a new Gypsies and Travellers Plan. This Plan will identify land to meet the accommodation needs of travellers in Wiltshire up to 2038.

We are now inviting comments on the Plan. You can view the document, and comment here until Friday 4 October 2024:

wiltshire.gov.uk/planning-gypsy-travellers

This leaflet provides an overview of the plan.



Scan me to have your say

Gypsy and Traveller community support

The Plan is informed by an accommodation need assessment that was carried out by Opinion Research Services (ORS) on our behalf in 2023/24. ORS are working with us again and are available if you have any questions about the consultation. You can contact them weekdays between 9am and 5pm.

Gill Craddock: 07539 999901
 Lee Craddock: 07419 241925
 Email: WiltshirePlan@ors.org.uk



Scan me to have your say

Wiltshire Council

Wiltshire Council

Schedule 2: Summary of the key issues raised by the Regulation 20 representations

5.19 Schedule 2 provides a series of tables that outline the key issues raised pursuant to Regulation 19/20 and the comments received. These are presented in plan order.

Please note, the tables that follow are not intended to provide a verbatim list of all issues raised from each and every representation, rather they present a judgement of key issues that have arisen following analysis of all comments received to provide an illustration of the key issues raised against each part of the plan. They are also intended to provide an indication of who has contributed to any key issue(s).

5.20 Each table will be presented in the format as illustrated in the template table below.

Table 5.4 [Insert policy number / part of plan being referred to] key issues

Key issues raised (Insert policy xx / local plan part)	Respondent(s)
(Sub headings used to group key issues of a similar theme)	
<p>Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.</p>	<p>Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 10 individuals)</p>
<p>Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.</p>	<p>Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 60 individuals)</p>
<p>Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.</p>	<p>Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 100 individuals)</p>
(Sub headings used to group key issues of a similar theme)	
<p>Insert summary heading of key issue to introduce it [insert plan reference if applicable]: Insert key issue wording summarising what representations said contributing to this key issue.</p>	<p>Inserted here are a list of respondents that contributed to this key issue. This is presented by referring to an organisation or, where no organisation is applicable, the number of individuals contributing to this key issue (e.g., Natural England; Developer; 300 individuals)</p>

Gypsies and Travellers Development Plan Document Section 1: Introduction

5.21 Please see below the key issues tables listing the key issues raised for the parts of the plan within section 1: Introduction namely:

- What is the Plan?
- How to use this Plan?
- How has the Plan been prepared?
- Next steps

Table 5.5 Introduction key issues

Key issues raised (Introduction)	Respondent(s)
General Comments	
Suggests No Changes: Lydiard Millicent Parish Council suggest no changes to the Plan.	Lydiard Millicent Parish Council.
No comment: The Canal and River Trust have reviewed the consultation documentation and make no comments on the plan.	Canal and River Trust.
Potential for consultation with statutory body: If any works are in the vicinity of any Exolum Pipeline apparatus, then please contact Exolum Pipeline System Ltd.	Exolum Pipeline System Ltd.
Earlier consultation would have been beneficial: The Council should have consulted with parishes at an earlier stage regarding the site selection process and the proposed sites.	Little Somerford Parish Council.
Supports provisions being made for the Gypsy and Traveller community: Welcomes the presence of Gypsies and Travellers in the community.	Individual x1.
Climate Emergency: The plan does not tackle the global climate emergency.	Individual x1.
Plan is inconsistent and unjustified: Plan is not consistent with national planning policy and is not justified.	Individuals x5.
Duty to Cooperate: Wiltshire Council has not adequately consulted with neighbouring authorities.	Individual x1.
Unsound: The overall plan is unsound.	Individual x1.
Planning enforcement action: To date, experience with enforcement action taken on Gypsies and Travellers sites has been negative with little progress being made.	Semington Parish Council.
Lack of overall need: No need for more Gypsy and Traveller sites as there are already some unauthorised pitches at Frampton Farm, Sutton Benger.	Individual x1.
Touring vans: Section 3.6 mentions that extra touring vans can be used as single adult/teenage accommodation as well as 'those soon to need accommodation' which is ambiguous wording and hard to quantify.	Individual x1.
Site Specific Comments (see relevant policy for further comments)	
Access to dairy farm site: Land will remove access of farmer to dairy farm on site. (Comment in relation to unknown site)	Individual x1.

Table 5.6 What is the plan? key issues

Key issues raised (What is the plan?)	Respondent(s)
General comments	
Funding: Query how development of the sites will be funded.	Individual x1
Unsound: The Plan is not sound. Query the need to meet accommodation needs.	Individual x1
Financial Statement: The Plan is well prepared with great detail. A financial statement to complete the justification of sites would be expected. A summary explaining if they are to be funded by Wiltshire Council or the national government and if there are any financial benefits such as rental income, council tax etc.	Individual x1
Paragraph 1.2: Text in paragraph 1.2 clarifying the extent of the Plan area and that it excludes the New Forest National Park area is welcomed. However, Figure 1 could be clarified. The administrative area of Wiltshire Council overlaps with the New Forest National Park, which is covered by the New Forest National Park Authority. It should be noted that New Forest District Council and the New Forest National Park Area are undertaking their own GTAA to cover this area which will inform future Local Plan policies.	New Forest National Park Authority, New Forest District Council
Difficulty Navigating the Plan: The Plan is difficult to navigate and does not promote cooperation and transparency.	Individual x1
Monitoring: Questions raised over who is responsible for the policing of the sites - check in, check out, managing good behaviour, overstay and capacity. Who is responsible for maintenance of sites - hedges, trees, watering new plants, pruning, maintenance of waterways, hard surfaces and paths and rubbish disposal. What are the arrangements for sewerage, how will chemical toilets be emptied. How will utilities e.g. water and electricity be paid for.	Individual x2
Habitats Regulations	
Appropriate Assessment: It is noted an appropriate assessment under the provision of the Habitats Regulations has been undertaken by LUC. The assessment concludes the proposal will not result in adverse effects on the integrity of European sites. Natural England is satisfied and have no objections to the proposal, providing that all mitigation measures are appropriately secured in any permission given.	Natural England
Site Selection	
Site Selection Process: A number of existing Gypsy and Traveller sites were omitted from the existing sites in the appraisal documentation that could be expanded as alternatives to new sites. Whilst acknowledging the identified need for 81 pitches, following a number of recent planning decisions, the need has reduced to 68	Chippenham Without Parish Council, Kington St Michael Parish Council

Key issues raised (What is the plan?)	Respondent(s)
pitches. Other planning applications in the pipeline could reduce that number further. There are numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be considered suitable and could prevent further development in the open countryside.	

Table 5.7 How to use this Plan? key issues

Key issues raised (How to use this Plan?)	Respondent(s)
General Comments	
Plan length and language: The Plan is too long with a lot of technical language.	Individuals x2
Communication of Plan: Plan was communicated ineffectively to Erdington community.	Individual x1.

Table 5.8 How has the plan been prepared key issues

Key issues raised (How has the Plan been prepared)	Respondent(s)
General comments	
Plan is out of date and discriminatory: Considers the plan document out of date and ethnically discriminatory.	Individual x1.
Too much and too complicated consultation material: Too many complex documents, a short summary of salient points should have been prepared, which would limit the need to seek assistance from others to gain an understanding of the document/process.	Individual x1.
Residents do not all have access to computers: Implied computer literacy, the majority of the public are not computer literate or have access to a printer.	Individual x1.
Difficulty using consultation portal: The portal was difficult to use due to use of 'planning/government' speak, confusing where to add comments relating to site-specific elements and the general consultation process and what was considered compliant.	Individual x1.
Lack of notification regarding consultation: The consultation process was not widely notified/advertised, with publicity of the process, meetings and deadlines being haphazard and hidden in manner. A letter should have been sent to everyone in Wiltshire informing them of the process and proposals.	Individual x1.
Unknown Site: One comment received in relation to an unknown site under this policy. Concerns raised with regard to the road and site location, access to local facilities, sanitation and the effects on local nature stability.	Individual x1.
Site Selection	
Unauthorised pitches could be considered: Reference made to numerous unauthorised pitches in the locality and throughout northern Wiltshire that could be suitable, even considered brownfield-land rather than taking areas of open countryside.	Langley Burrell Parish Council.

Table 5.9 Next Steps key issues

Key issues raised (Next Steps)	Respondent(s)
Support the Policy	
Support policy: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.

Gypsies and Travellers Development Plan Document Section 2: Objectives

5.22 Please see below the key issues table listing the key issues raised for the part of the plan within section 2:

- Objectives:

Table 5.10 Objectives key issues

Key issues raised (Objectives)	Respondent(s)
General Comments	
Agricultural land: The Plan should avoid impact on the best and most versatile agricultural land in the county.	Individual x1.
Support: Dorset Council supports the four broad objectives.	Dorset Council.
Consultation: The Plan has not been created in consultation with local communities and does not consider the impact on settled residents.	Clarendon Park Parish Council.
Environmental requirements: The Plan has no consideration towards net zero targets, noise pollution requirements, flooding and infrastructure requirements. There should be an Environmental Impact Assessment.	Clarendon Park Parish Council.
Balanced communities: Wiltshire Council should seek to support mixed and balanced communities in plan-making and decision taking.	Clarendon Park Parish Council.

Gypsies and Travellers Development Plan Document Section 3: Strategy for Meeting Travellers Needs

5.23 Please see below the key issues table listing the key issues raised for the part of the plan within section 3: Strategy for Meeting Travellers Needs namely:

- Policy GT1: Meeting the needs of gypsies and travellers, and travelling showpeople
- Policy GT2: Safeguarding gypsies and travellers, and travelling showpeople sites
- Policy GT3: New sites and intensification of existing sites
- Policy GT4: Meeting needs of gypsies and travellers for culturally appropriate accommodation
- Policy GT5: Emergency Stopping Sites

Table 5.11 Strategy for Meeting Traveller Needs key issues

Key issues raised (Strategy for Meeting Traveller Needs)	Respondent(s)
Support	
Support the strategy: Support the Plan strategy.	Individuals x2.
Meeting need: Support the allocation of suitable sites which would work in the interest of meeting needs and improving the relationship between settled and traveller communities.	Individual x1.
Meeting need: Support Policies GT1-GT5 in identifying the methods of meeting the needs of the travelling community within Wiltshire.	Individual x1.
Meeting need: Swindon Council is seeking to meet its needs in full. Should this not be possible following the outcome of the site appraisal work, Swindon Borough Council would like to continue further constructive engagement with Wiltshire Council and other Local Authorities on this matter	Swindon Borough Council
Duty to Cooperate: Will continue to engage and work with Wiltshire Council on cross-boundary strategic planning matters including Gypsies and Travellers through the Duty to Co-operate.	Somerset Council.
Key Diagram: In the Key Diagram (Figure 1), a line showing the extent of the Plan area rather than Wiltshire Council administrative area would be more helpful so it is clear that New Forest National Park, which has its own local planning authority does not form part of the Plan area. Alternatively a note under the diagram could be helpful.	New Forest National Park Authority.
Concentration of sites: Excessive concentration of sites to a particular area. It is considered that sites should be more evenly distributed across the county of Wiltshire, better use should be made of the transport corridor afforded by the A338 and A346.	Individual x1.

Table 5.12 Policy GT1 - Meeting the needs of gypsies and travellers, and travelling showpeople key issues

Key issues raised (Policy GT1 Meeting the needs of gypsies and travellers, and travelling showpeople)	Respondent(s)
General Comments	
More sites needed: The Plan is an improvement but more sites will be needed.	Individual x1.
Supportive of approach: Generally supportive of the approach taken to meeting permanent and temporary accommodation needs of the traveller communities.	Individual x2.
Support safeguarding: Support safeguarding existing sites.	Individual x1.
Strategy is consistent with national policy: The strategy, specific site allocations and setting an updated criteria-based policy framework, is considered to be positively prepared, justified, effective and consistent with national policy.	Individual x1.
Distribution of sites: The council does not consider that the distribution of proposed allocations and safeguarded Traveller sites are likely to raise any significant strategic cross boundary matters or issues for Dorset Council.	Dorset Council
Meeting need: no formal request to Bath and North East Somerset Council to consider helping to address unmet needs has been issued. Prior discussions indicated the approach of meeting unmet need or household growth for those not meeting the planning definition would be within the Wiltshire boundary. This approach is supported by Bath and North East Somerset Council.	Bath and North East Somerset Council
Windfall sites: Bath and North East Somerset Council understands that any unmet need falls within the Wiltshire boundary. However, taking note of further Windfall proposals that may take place, should households from Wiltshire seek to purchase land in Bath and North East Somerset the application would need to comply with local planning policies. Discussions/ongoing collaboration is requested on this matter.	Bath and North East Somerset Council
Planning Definition of Gypsies and Travellers	
Still discriminatory: The planning definition for Gypsies and Travellers was challenged in 2015 but is still discriminatory.	Individual x1.
Approach to meeting need: The approach to meeting the need from households that do not meet the planning definition for Gypsies and Travellers is fairly common.	Individual x1.
Accommodation needs of the whole community: Not including elderly or disabled Gypsies and Travellers does not account for accommodation needs of the whole community and is therefore discriminatory.	Individual x1.

Key issues raised (Policy GT1 Meeting the needs of gypsies and travellers, and travelling showpeople)	Respondent(s)
<p>Approach to meeting need: The approach taken through Policy GT1 to meeting needs is considered to be sound, sensible and pragmatic, and is broadly consistent with approach the Council is taking to meeting needs in South Gloucestershire, set out through its Phase 3 Local Plan consultation document. Notably, Wiltshire’s approach and that of the Council diverge as this policy relates only to the needs of those travellers who meet the planning definition of “gypsies and travellers“ and “travelling showpeople” as per Planning Policy for Traveller Sites. The needs of those who do not meet these definitions are instead addressed through Policy GT4. The Council however, raises this as an observation and matter of fact only.</p>	South Gloucestershire Council
Monitoring	
<p>Pitch numbers: Careful monitoring should be undertaken if the need for pitches from households that do not meet the planning definition of Gypsies and Travellers is being met, to inform future review of policy and potential for identifying additional sites closely to where need arises.</p>	Individual x1.
<p>Net pitch targets: The supply figures for pitches in para 3.2 of the Plan appear to be invalid and should consider the significant number of newly approved sites and unauthorised sites that have sprung up, thereby reducing the residual need for new pitches down from 81 pitches.</p>	Individual x2.
Equality	
Need for fair treatment for all in relation to planning applications for residential use.	Individual x1.
Suggested modifications	
<p>Improve clarity: The wording of Policy GT1 is ambiguous. Concerns raised on what constitutes appropriate intensification. The terms authorised sites and safeguarded sites are interchanged and thus should be clarified. What are the parameters that would define the appropriateness of a proposal for intensification? Give a clear expectation on what could be delivered through an intensification proposal.</p>	Amesbury Town Council.
<p>Insert reference to Policy GT3 into Policies GT1 and GT2: Incorporate Policies GT1 and GT2 with specific reference to compliance with policy GT3. Incorporating this into the policy wording would strengthen the policy's effectiveness and soundness.</p>	Amesbury Town Council.

Table 5.13 Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites key issues

Key issues raised (Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites)	Respondent(s)
Highways and Transport (including access)	
Poor accessibility: The nearest pharmacy is over 1km away and other key facilities are not located close to Fairview Park.	Amesbury Town Council.
No specific concerns: No specific concerns regarding soundness or impacts to the Strategic Road Network.	National Highways.
Minimising Traffic Increase: A number of safeguarded sites under Policy GT2 are adjacent to level crossings. Any development that would materially increase levels of traffic using railway crossings should be refused unless their safety will not be compromised.	Network Rail.
Site-specific comment: Specific site at Sunnyside is over-occupied and surface water from the site floods the highway which has not been investigated by Wiltshire Council. It is in the interest of communities that all regulatory requirements are applied equally.	West Ashton Parish Council.
Utilities and Drainage	
Provisions to protect existing utility assets: To ensure that Policy GT3 'New Sites and Intensification of Existing Sites' is consistent with national policy we would request the inclusion of a policy strand such as: Development should take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.	Avison Young on behalf of National Gas Transmission.
Site Design (including privacy)	
Deletion of Policy: Policy GT2 seeks to propose restrictions on existing sites, particularly 'land at Petersfinger Business Park'. Policy should be deleted alongside any references to safeguarding or protecting sites.	Individual x1.
Other	
Planning definition of Gypsies and Travellers is not inclusive: This definition is still discriminatory of disabled and elderly people being able to live on their own.	Individual x1.
Consideration of cross-boundary impacts: The New Forest National Park Authority welcomes the reference to the consideration of impacts on the New Forest protected areas.	New Forest National Park Authority.
Safeguarding existing sites: New Forest District Council supports the approach to safeguard existing sites and the decision not to identify Blandford Road for intensification.	New Forest District Council.

Key issues raised (Policy GT2 - Safeguarding gypsies and travellers and travelling showpeople sites)	Respondent(s)
Travelling showpeople need: Swindon Borough Council may request if neighbouring authorities can assist in meeting the need for Travelling Showpeople if they are unable to accommodate a site within Swindon. This issue will be kept under review through collaboration and in preparing an agreed Statement of Common Ground.	Swindon Borough Council
Plan is sound: Overall the approach to preparing this Plan is sound, sensible and pragmatic.	South Gloucestershire Council.
Unclear which sites are allocated or safeguarded: Some sites allocated for development are also allocated to be safeguarded.	Amesbury Town Council.
Specific quantum of development should be defined: Policy GT2 should specify the specific quantum of development to be allowed at each specific site.	Amesbury Town Council.
Exception: It is unclear how Policy GT2 would support family cohesion. It is also unclear what mechanisms Wiltshire Council has to control intensification.	Amesbury Town Council.
Intensification: Policy GT2 should make clearer reference to which sites are suitable for intensification.	Amesbury Town Council.
Planning history not compatible with proposed development: Previous planning application for intensification of Fairview Park site was objected to for several reasons including utilities connections, access (including visibility) and fire risk. All of these issues still persist.	Amesbury Town Council.
Additional requirements to mitigate noise pollution: Policies GT2 and GT3 should include provisions requiring developments to provide suitable mitigation of noise pollution.	Amesbury Town Council.
Sunnyside: West Ashton Parish Council supports the inclusion of Sunnyside as an allocation; but would like to raise concerns with the level of occupancy at the existing site far exceeding the permitted limit and poor drainage provisions to deal with surface water flooding.	West Ashton Parish Council.

Table 5.14 Policy GT3 - New sites and intensification of existing sites key issues

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
General Comments	
No comment: No comment to make, unaffected by the proposals.	Bristol Water x1
Vehicle access: The plan needs to ensure that all sites are accessible to all types of vehicle.	Melksham Town Council
Opening hours: Site opening hours must be set to allow for late arrivals.	Melksham Town Council
Monitoring: It is unclear how Wiltshire Council will monitor and manage each site.	Grimstead Parish Council
Utilities: Sites need to have all basic services/utilities.	Melksham Town Council
Public Transport: Proximity to public transport, walking and cycling infrastructures, all play a key role in reducing transport emissions. Perhaps, this can be further emphasised in the Site Selection Report.	Gloucestershire County Council
Mitigation of air quality: If there can be an impact to any nearby Air Quality Management Areas because of the policy. A reference to "Wiltshire Council's Air Quality Action Plan" may also be drawn from.	Gloucestershire County Council
Site Selection Process: In the site selection process, sites ruled out at Stage 5 should be reconsidered during the Sequential Test at Stage 6.	Individual x1
Well-designed sites: It is unclear how Wiltshire Council will meet its objective of providing 'well designed' sites.	Grimstead Parish Council
Protected sties: Policy GT3 should recognise internationally protected sites as well as the potential for appropriate assessment of new sites that have likely significant effects.	Individual x1
Thorough policy: Support Policy GT3 as it is very thorough.	Individual x1
Site Selection Criteria (primary schools): Why are only primary schools considered in site selection criteria?	Individual x1
Approach to meeting need: Agree with the approach to meeting need in the Plan, by way of site allocations and criteria based policy framework.	Individual x1
Site Selection Criteria: Stage 5 reasons for excluding sites should not carry more weight than flooding.	Individual x1
Flood risk: The Plan should state that sites at lower risk of flooding should be developed in preference to those at higher risk.	Individual x1
Modification: Representor proposes a modification that the Plan includes a reference to using the sequential approach for flood risk and those with lower risk being developed in preference.	Individual x1

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
Thorough approach: Policy GT3 is very thorough and covers similar issues to those covered in the draft policy South Gloucestershire Council published.	South Gloucestershire Council
Recognition of protected sites: The recognition of international protected sites in paragraph 3.37 is welcome, although this should be reflected in the wording of Policy GT3 as well as recognition that likely significant effects from any new sites that come forward may need fresh consideration under Appropriate Assessment, as required by the Habitat Regulations. Minor comment: formatting issues xiii to v. Two bullets	New Forest District Council
Site Specific Comments	
Access: No mention of how the tenant farmer will access the field.	Individual x1.
Impact on farming: Development would impact 'organic' farm and its farming practises.	Individual x1.
Schools: Nearby schools are not within walking distance.	Individual x1.
Location: Isolation from the village makes integration into community unlikely.	Individual x1.
Utilities and Services	
Comprehensive and Coordinated approach: Policy GT3 should include requirement that development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.	Individual x1.
Water and sewerage infrastructure: Support for reference to water and sewerage infrastructure in Policy GT3 (iv) but should be strengthened to require engagement with water/wastewater companies at the earliest opportunity in accordance with national planning policy and guidance (as set out in the modifications section below): For any new sites in the Thames Water area, early engagement between the developers and Thames Water would be beneficial to understand: What drainage requirements are required on and off site; Clarity on what loading/flow from the development is anticipated; Water supply requirements on and off site.	Thames Water.
Communication networks: Policy GT3 doesn't cover accessibility to communication networks, mobile data and broadband coverage.	Individual x1.
Poor signal: Poor phone signal in this area which would affect the travellers living at the Site.	Individual x1.
Connection to national grid: National Grid Electricity Transmission notes there is increasing pressure for development sites entering the planning process on land that is crossed by National Grid Electricity Transmission	Avison Young on Behalf of National Grid.

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
infrastructure. They also go on to state a creative approach is required in developing around high voltage overhead lines and other National Grid Electricity Transmission assets.	
Support for access and highways criteria: National Highways particularly welcomes the inclusion of criteria ii, iv, v and ix.	National Highways
Suggested modifications	
Consideration of communities: Update Policy GT3 to include equal respect and consideration in planning for the nomadic and settled community as PPTS.	Individual x1.
Consider site constraints: The inclusion of the following policy strand: "Development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situation within sites"	Avison Young on Behalf of National Grid.
Agricultural land: Policy GT3 should include a requirement to avoid best and most versatile agricultural, unless no further suitable sites are available.	Individual x1.
<p>Water/wastewater infrastructure and drainage: Thames Water proposes inclusion of the following in the policy/section of the Plan:</p> <ul style="list-style-type: none"> • "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades" and "The Local Planning Authority will seek to ensure that there is adequate water and waste/water infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development". • "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met" 	Thames Water.

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
<ul style="list-style-type: none"> • "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding." • "Surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha)." 	
Suggested policy wording	
<p>Supportive of the need to intensify sites but considers wording not strong enough. Amesbury Town Council considers that the policy requirements should be strengthened and made clearer to ensure that the text of the policy is unambiguous and effective. Policy rewording is suggested for some of the criteria:</p> <ul style="list-style-type: none"> • Criterion iii: The scale of the development should not only be seen in terms of domination of the settled community but also as an urban grain relationship with the settlement. The scale of the development should be appropriate to ensure that it adequately integrates in the wider village, town or countryside. The scale (and layout) of the site should respond positively to the wider settlement pattern and established local character where possible. • Criterion v: Access to walking and cycling infrastructure as well as public transport would be essential to reduce vehicular trips. Therefore, the policy should refer to the wider transport network, not only to the highway network. • Criterion vi: The proposed wording is not strong enough. 'Where practicable' is an undefined term and leads to different interpretations, therefore not being effective in securing the necessary foul water connections to the mains, which are essential for the protection of the environment. Alternative solutions should only be allowed where connecting to the mains is not possible and appropriate conditions should be added to planning permissions to secure an adequate foul water treatment plant as well as management and maintenance. • Criterion vi: The proposed wording is not strong enough. 'Where practicable' is an undefined term and leads to different interpretations, therefore not being effective in securing the necessary foul water connections to the mains, which are essential for the protection of the environment. Alternative solutions should only be allowed where connecting to the mains is not possible and appropriate conditions should be added to planning permissions to secure an adequate foul water treatment plant as well as management and maintenance. • Criterion vii: The proposed text is too specific and does not address the negative impact that bins cause to the street scene, the public realm and the prominent presence within residential properties (in this case traveller site). We would recommend rephrasing it to: 'Bin storage should be well integrated, accessible, discreet, safe and secure and aligned with the local Waste Authority collection service.' 	Amesbury Town Council.

Key issues raised (Policy GT3 - New sites and intensification of existing sites)	Respondent(s)
<ul style="list-style-type: none"> • Criterion viii: The surface water drainage strategy should better align with the Wiltshire Core Strategy's sustainable drainage system principles and require a management and maintenance scheme, to ensure its long-term durability. The policy requirement, as currently worded, is not strong enough as to secure an effective surface water drainage system and the adequate responsibilities that would ensure its long-term viability. • Criterion x: It would be important, to ensure the appropriate living conditions of gypsies and travellers on site that the policy refer to the potential impacts of nearby uses on the gypsy and traveller site. Neither the development, nor the nearby uses and activities should result in unacceptable levels of noise, air quality, and light pollution. Referring to nearby uses and activities would be necessary to ensure that there is no intensification of use (more residents) where there are inadequate living conditions due to uses nearby that disturb living conditions. • Criterion xiv: Adequate management and maintenance of buffers should be included in the policy to secure their long-term life. 	

Table 5.15 Policy GT4 - Meeting the needs of gypsies and travellers for culturally appropriate accommodation key issues

Key issues raised (Policy GT4 Meeting needs of gypsies and travellers for culturally appropriate accommodation)	Respondent(s)
Monitoring	
<p>Monitoring for pitches and households that do not meet the planning definition: The approach taken in terms of local authorities addressing requirements of Gypsies and Travellers who do not meet the national Planning Policy for Traveller Sites planning definition is fairly common. It is suggested that careful monitoring should be undertaken for pitches and households that do not meet the planning definition. This information will inform Policy reviews and the demand for sites.</p>	Bath and North East Somerset Council
Support	
<p>Support the approach: New Forest District Council supports the approach for traveller households who do not meet the definition and safeguarding existing sites.</p>	New Forest District Council

Table 5.16 Policy GT5 - Emergency Stopping Sites key issues

Key issues raised (Policy GT5 - Emergency Stopping Sites)	Respondent(s)
Monitoring of Future Emergency Stopping Sites	
Appropriate Assessment Screening: Trusts that Appropriate Assessment screening to ascertain impacts on internationally protected sites will be a consideration in site selection.	New Forest District Council.
Monitoring Emergency Stopping Site Need: No need for a formal public transit site in South Gloucestershire currently. But the situation should continue to be monitored and management-based approaches such as negotiated stopping should be considered.	South Gloucestershire Council.
Broad location of search: Dorset Council notes the broad location of search in the south east of Wiltshire Council area for emergency stopping sites. This search extends up to the shared boundary between Dorset and Wiltshire Councils. Dorset Council would welcome the opportunity for further constructive and active engagement on this issue as part of ongoing co-operation between the councils.	Dorset Council

Gypsies and Travellers Development Plan Document Section 4: Site Allocations

5.24 Please see below the key issues table listing the key issues raised for the part of the plan within section 4: Site Allocations namely:

- Site Allocations
- Site Intensifications
- Policy GT6: Braemar and Braemar (2)
- Policy GT7: Calcutt Park
- Policy GT8: Dillons Farm
- Policy GT9: Easton Lane
- Policy GT10: Lansdowne
- Policy GT11: Oak Tree Field
- Policy GT12: Poplar Tree Residential Park
- Policy GT13: The Poplars
- Policy GT14: Rose Field Caravan Site, Hullavington (No representations received)
- Policy GT15: Land South of Bridge Paddocks
- Travelling Showpeople (No representations received)
- GT16: Land opposite the Laurels
- GT17: Land adjacent Nursteed Park
- GT18: Petersfinger Business Park
- Site Allocations to meet pitch needs from households that do not meet the planning definition
- GT19: Former Glenville Nurseries (No representations received)
- GT20: Greenfield View, Leigh
- GT21: Land at Capps Lane
- GT22: Melbourne View
- GT23: 79 Southampton Road
- New Site Allocations
- GT24: Bushton North Farm
- GT25: Land at Housecroft Farm (1)
- GT26: Land at Housecroft Farm (2) Edington Road, Edington
- GT27: Land at Cleverton, Cleverton
- GT28: Land at Oxhouse Farm, Rowde

- GT29: Land at Upper Seagry Farm, Upper Seagry
- GT30: Land at Whistley Road, Potterne
- GT31: Land at Thickthorn Farm, Preston Lane, Lyneham

Table 5.17 Site Allocations key issues

Key issues raised (Site Allocations)	Respondent(s)
Environmental impacts: Concerned about the sewerage going into the local environment and nature by destroying hedgerows to create bigger access into field to get mobile homes in.	Individual x1.
Pollution concerns: Concerned about noise, light and smell pollution from generators.	Individual x1.
Loss of farmland: Loss of farmland from our local farmers.	Individual x1.
Surface water: Concerned about concrete pads for mobile homes displacing surface water and discharge of water from the site itself creating a higher risk of flooding to road and properties at a lower elevation to the proposed site.	Individual x1.
Local amenities: The site is not close to local amenities, shops, doctors, schools and there is no public transport. Therefore cars would have to be used creating more traffic and pollution on a small country road which goes against council policy.	Individual x1.
Flood zones 2 and 3: The majority of the proposed site allocations (Policy GT6 - GT31) are located outside of flood zones 2 and 3 however, there are a few site allocations that are located in close proximity to current flood zones 2 and 3. As we do not know the full extent of future flood zones we advise that the document requires planning applications to include a sequential approach to site design, ensuring that all built development is outside flood zone 2 and 3.	Environment Agency.
Support the Policy	
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council
Site allocations: Specific site allocations are made under Policies GT6 to GT30 and include existing sites identified as suitable for intensification as well as having new sites. With regards to the proposed new sites, these appear to be in locations and of a scale that is unlikely to impact the SRN. Any site specific applications that come forward through the planning process will be considered based on network conditions and their merits under the prevailing policy at the time.	National Highways
Objection	

Key issues raised (Site Allocations)	Respondent(s)
<p>Concentration of sites in West Wiltshire: There is an excessive concentration of sites in West Wiltshire. The plan should make better use of the A338 and A346 transport corridor. There is no need to concentrate sites along the A350 as in the current plan.</p>	<p>Steeple Ashton Parish Council</p>
<p>Improvements</p>	
<p>Brownfield sites: Brownfield sites should have been identified for the Gypsies and Travellers sites as there are a lot of industrial estates which would provide better access.</p>	<p>Individual x1</p>

Table 5.18 Site Intensification key issues

Key issues raised (Site Intensification)	Respondent(s)
Infrastructure	
<p>Policy should ensure that developments do not impact utility assets: National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9) and Frampton Farm. Need to ensure that Policy GT3 is consistent with national policy and would request the inclusion of policy strand such as; "Development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites". National Grid Electricity Transmission are happy to provide advice and guidance to Wiltshire Council concerning their networks.</p>	Avison Young on behalf of the National Grid
General Comments	
<p>Support site intensification: Supportive of the approach to maximise capacity and potential of existing sites, subject to environmental, heritage and landscape constraints.</p>	New Forest District Council
<p>Proactive approach: It is noted Wiltshire Council is generally proactive in taking new sites and changes to existing sites (such as intensification) forward, unless they do not comply with their Local Plan Policies.</p>	Bath and North East Somerset Council
102 Melksham Forest Farm 1 and 103 Melksham Forest Farm 2	
<p>Support: Support elimination of the Forest Farms for the reasons supported in the site selection report.</p>	Melksham Without Parish Council

Table 5.19 Policy GT6 Braemar and Braemar (2) key issues

Key issues raised (Policy GT6 Braemar and Braemar (2))	Respondent(s)
Site Design	
Support: Support the allocation of five further pitches. There will be a number of children who will require accommodation in the next few years and this allocation will ensure that their needs are met.	Individual x1.
Request for consultation where required: The MOD recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT6 it is affected by the MOD Boscombe Down (height, birdstrike safeguarding zones) and Central WAM Network (technical safeguarding zone).	Ministry of Defence
River Quality and Biodiversity	
Support cross boundary mitigation: The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.

Table 5.20 Policy GT7 - Calcutt Park Key Issues

Key issues raised (Policy GT7 - Calcutt Park)	Respondent(s)
Support the Policy	
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.
Unlikely to impact the A419 junction: The allocation is for 1 additional pitch created through the sub - division of an existing pitch. We consider this scale of intensification is unlikely to impact on the nearby A419 junction.	National Highways.
Other	
Existing sites close to Cricklade: No clear reference to existing sites in neighbouring authorities that are close to Cricklade.	Cricklade Town Council.
Monitoring of sites: Anecdotal evidence that not all sites are occupied by the travelling community e.g. Two traveller sites at Tadpole lane. How is it to be monitored?	Cricklade Town Council.
Utilities and Drainage	
Flood Zone 2: Policy GT7 Calcutt Park contains small amounts of Flood Zone 2. Any residential accommodation must not be located within current Flood Zones 2 and 3.	Environment Agency.
Proposed allocations are outside flood zones 2 and 3: The majority of the proposed site allocations (Policy GT6 - GT31) are located outside of flood zones 2 and 3 however, there are a few site allocations that are located in close proximity to current flood zones 2 and 3. As we do not know the full extent of future flood zones we advise that the document requires planning applications to include a sequential approach to site design, ensuring that all built development is outside flood zone 2 and 3.	Environment Agency.
Site Design	
Consultation requirement: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.
Development to be formed temporarily if environment attractive to bird species: Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	MOD - Defence Estates Organisation.

Table 5.21 Policy GT8 - Dillons Farm key issues

Key issues raised (Policy GT8 - Dillons Farm)	Respondent(s)
River Quality and Biodiversity	
Reference to New Forest Protected Sites: Welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest Park Authority.
Site Design	
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.

Table 5.22 Policy GT9 Easton Lane key issues

Key issues raised (Policy GT9 - Easton Lane)	Respondent(s)
Utilities and Drainage	
Utilities and Drainage: Under Policy GT9, Easton Lane is required to provide sufficient drainage, sufficient landscaping and retention of 25m wide habitat adjacent to the railway lines. Network Rail would expect to be consulted on plans relating to this site to ensure any works do not adversely impact the railway and are to Network Rail standards.	Network Rail.
Environmental Permits: Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.	Environment Agency.
National Grid: National Grid Electricity Transmission assets either cross or are in close proximity of the Easton Lane, Thingley site (Policy GT9) and Frampton Farm. National Grid Electricity Transmission would like to ensure that Policy GT3 is consistent with national policy and would request the inclusion of policy strand such as; "Development would take a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites" National Grid Electricity Transmission go on to state they are happy to provide advice and guidance to the Council concerning their networks.	Avison Young on behalf of the National Grid.
Landscape	
Proper management of pollution and contaminants: The developer would need to ensure not to create unacceptable risk of pollution from any contamination that might exist. Any groundworks that have potential to disturb waste deposits, disposal of surface water leading to mobilisation of contaminants.	Environment Agency.
Contamination Risk Assessment: The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination.	Environment Agency.
Site Design	
Support: In support of the pitch and site allocation.	Corsham Town Council, Individual x1.
Ministry of Defence: The site is within the safeguarding zones for two Ministry of Defence sites; RAF Colerne and RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the MOD, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.	Ministry of Defence - Defence Infrastructure Organisation.

Key issues raised (Policy GT9 - Easton Lane)	Respondent(s)
Fly-tipping: Rubbish and fly tipping are already an issue. Concern that the presence of the site will make this worse.	Individual x1.
Impacts to wider area: Concerns raised on the impact on the surrounding area.	Individual x1.

Table 5.23 Policy GT10 - Lansdowne key issues

Key issues raised (Policy GT10 Lansdowne)	Respondent(s)
Site Design	
General Support: Supports the inclusion of additional pitches on the site given growing need for family accommodation.	Individual x1.
MOD Safeguarding Zones: Where sites are located within the relevant safeguarding zones (GT10 is located in the RAF KEEVIL Safeguarding zone), if any development exceeds 45.7m in height, the MOD will need to be consulted upon.	MOD.

Table 5.24 Policy GT11 - Oak Tree Field key issues

Key issues raised (Policy GT11 - Oak Tree Field)	Respondent(s)
Site Design	
New Forest Protected Sites: The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
Consultation with MOD: The MOD recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT11 it is affected by MOD Boscombe Down (height and birdstrike safeguarding zones) and the Central WAM Network (technical safeguarding zone).	MOD.

Table 5.25 Policy G12 - Poplar Tree Residential Park key issues

Key issues raised (Policy GT12 - Poplar Tree Residential Park)	Respondent(s)
Site Design	
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.
Bird strike: Development may result in creation/temporary creation of attractant environments for large and flocking bird species hazardous to aviation.	MOD - Defence Estates Organisation.
Approval: Happy to accept policy allocation.	Individual x1; Southwick Parish Council.
Landscape	
Hedging: Members are disappointed that much of the hedge has already been removed.	Southwick Parish Council.

Table 5.26 Policy GT13 - The Poplars key issues

Key issues raised (Policy GT13 - The Poplars)	Respondent(s)
Site Design	
MOD Safeguarding Zones: The site is within the safeguarding zones for RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the MOD, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.	Ministry of Defence - Defence Infrastructure Organisation.
Planning status of site: Concerns raised that the site will no longer be designated a Gypsy and Traveller site with regard to further planning applications.	Individual x1.
Extension of Site: Concerns raised over the extension of the site and its location between Sand Pit Lane, the railway and the public bridleway. The current area is fully occupied.	Individual x1.
Highways and Transport	
Located away from local services: The site is remote from all local services.	Individual x1.

Table 5.27 Policy GT15 - Land South of Bridge Paddocks key issues

Key issues raised (Policy GT15 - Land South of Bridge Paddocks)	Respondent(s)
Site Design	
Overall need: There is a need for new Gypsy and Traveller pitches for families.	Individual x1.
Existing adjacent Gypsy and Traveller Site: This site is located next to a site that is currently occupied by Gypsies and Traveller however is not owned by these families living on the land adjacent.	Individual x1.

Table 5.28 Policy GT16 - Land Opposite the Laurels key issues

Key issues raised (Policy GT16 - Land Opposite the Laurels)	Respondent(s)
Site Design	
Development Height: Development of/exceeding 91.4m will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
Bird strike: Development may result in creation/temporary creation of attractant environments for large and flocking birds species hazardous to aviation.	Ministry of Defence - Defence Estates Organisation.

Table 5.29 Policy GT17 - Land adjacent Nurstead Park key issues

Key issues raised (Policy GT17 - Land adjacent Nurstead Park)	Respondent(s)
General Comments	
<p>Ministry of Defence Safeguarding Zones: The site is within the safeguarding zones for RAF Keevil. Policy wording should indicate that development should be designed to ensure it would have no impact on the operation or capability of defence sites or assets and should inform developers of the site-specific trigger points for statutory consultation with the Ministry of Defence, which, in relation to this site are the height above ground level of any proposed development and development that may attract large and flocking birds.</p>	<p>Ministry of Defence - Defence Infrastructure Organisation.</p>

Table 5.30 Policy GT18 - Petersfinger Business Park key issues

Key issues raised (Policy GT18 - Petersfinger Business Park)	Respondent(s)
General Comments	
Consultation requirement: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
Development to be formed temporarily if environment attractive to bird species: Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Ministry of Defence - Defence Estates Organisation.
Comments of Support	
New Forest protected sites: The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
Policy support: Support for the proposed allocation of one additional travelling show people plot at Petersfinger Business Park in accordance with the identified need.	Individual x1.
Accessibility: Access is directly from the A36 to the south - east of Salisbury. This allocation is for a single additional travelling showpersons plot, although the supporting text does note an identified potential future need by teenagers. The plan considers that space exists within the site (with some reconfiguration) to accommodate this need. Whilst this scale of intensification is unlikely to result in an unacceptable impact on the existing A36 access arrangements, National Highways would stress that any re - arrangement of the site must ensure that a safe and suitable internal vehicular layout is maintained which provides for adequate turning space and safe circulation.	National Highways.
Promotion of land: Promotion of land immediately adjacent to south - east of Petersfinger Business Park which is suitable, available and viable for travelling show people and can accommodate 3 plots to meet the identified need.	Individual x1.
Comments of Objection	
Does not consider the impact on settled residents: The Wiltshire Gypsies and Travellers Development Plan has not been created in consultation with local communities and does not consider the impact on settled residents living in the immediate environs of the areas proposed.	Clarendon Park Parish Council.

Key issues raised (Policy GT18 - Petersfinger Business Park)	Respondent(s)
<p>Legislation and guidelines have not been effectively considered: Wiltshire Council have not effectively considered the impact of the Gypsies and Travellers Development Plan on other legislation and guidelines including but not limited to; net zero targets, noise pollution requirements and flooding and infrastructure requirements.</p>	<p>Clarendon Park Parish Council.</p>
<p>Flood Risk</p>	
<p>Flood Zones 2 and 3: Petersfinger Business Park contains small amounts of flood zone 2 and 3. Any residential accommodation must not be located within flood zones 2 and 3 on the above sites.</p>	<p>Environment Agency.</p>

Table 5.31 Policy GT20 - Greenview, Leigh key issues

Key issues raised (Policy GT20 - Greenfield View, Leigh)	Respondent(s)
Site Design	
<p>Ministry of Defence Safeguarding Zones: The Ministry of Defence recommend any detailed policies for the site include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. In relation to GT20 it is affected by RAF Fairford (height and birdstrike safeguarding zones).</p>	<p>Ministry of Defence.</p>
<p>Site can accommodate allocation: Support the policy as since the Gypsy and Traveller Accommodation Assessment interview was conducted a need now exists for 2 pitches. There is adequate space to accommodate them.</p>	<p>Individual x1.</p>

Table 5.32 Policy GT21 - Land at Capps Lane key issues

Key issues raised (Policy GT21 - Land at Capps Lane)	Respondent(s)
Site Design	
Extra Pitch Required: Another pitch would be beneficial for teenagers to move onto.	Individual x1.
Development Height: Development of/exceeding 15.2m will trigger statutory consultation requirement.	Ministry of Defence - Defence Estates Organisation.
Bird Strike: Development may result in creation/ temporary creation of attractant environments for large and flocking birds species hazardous to aviation.	Ministry of Defence - Defence Estates Organisation.
Approval: Happy with site selection, no objection to policy.	Bratton Parish Council.

Table 5.33 Policy GT22 - Melbourne View key issues

Key issues raised (Policy GT22 - Melbourne View)	Respondent(s)
Utilities and Drainage	
Environmental Permits: Raised the need for potential Environmental Permits that may be required for the site, regarding any potential discharges. Also highlighted there may be potential drainage restrictions to adhere to.	Environment Agency.
Landscape and Amenity	
Contaminated Land Risk Assessment: The Environment Agency would expect any planning applications to be supported by a risk assessment in line with current guidance. The outcome of such assessment would determine the appropriate techniques required to mitigate against contamination. The developer would need to ensure not to create unacceptable risk of pollution from any contamination that might exist. Any groundworks that have potential to disturb waste deposits, disposal of surface water leading to mobilisation of contaminants.	Environment Agency.

Table 5.34 Policy GT23 - 79 Southampton Road key issues

Key issues raised (Policy GT23 - 79 Southampton Road)	Respondent(s)
General comments	
Consultation requirement: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement.	MOD - Defence Estates Organisation.
Development to be formed temporarily if environment attractive to bird species: Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	MOD - Defence Estates Organisation.
New Forest protected sites: The New Forest National Park Authority welcomes the reference to New Forest protected sites and the requirement for mitigation of recreational pressures.	New Forest National Park Authority.
Comments of objection	
Does not consider the impact on settled residents: The Wiltshire Gypsies and Travellers Development Plan has not been created in consultation with local communities and does not consider the impact on the immediate environs of the area proposed.	Clarendon Park Parish Council.
Legislation and guidelines have not been effectively considered: Wiltshire Council have not effectively considered the impact of the Gypsies and Travellers Development Plan on other legislation and guidelines including but limited to; net zero targets, noise pollution requirements and flooding and infrastructure requirements.	Clarendon Park Parish Council.
Consultation with local communities: Wiltshire Council have not effectively complied with their own aims as set out in the preamble to the document to "Reduce tensions between traveller and settled communities in plan - making and decision taking" as consultation with affected settled communities has been extremely limited given the highly emotive topic under consideration.	Clarendon Park Parish Council.

Table 5.35 Policy GT24 - Bushton North Farm Key issues

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Highways and Transport (including Access)	
Key facilities can only be accessed by car: Education and health facilities are 4km away and only accessible by car. This will not assist with the objectives of improving health and educational attainment and attendance. The allocation will also not meet the terms of Policy GT3.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Isolated from public transport: Location is isolated with an absence of public transport would increase reliance on private vehicles to access services/amenities.	Cllr Allison Bucknell; MFS Resolutions on behalf of Shillings Enterprises Ltd; Individuals x9.
Nearest bus stops are too far away: The nearest bus stops are 3.5kms to the north of the proposed allocation, or in Lyneham, over 4kms away.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
No bus routed servicing this site: The area is not served by bus routes so the only way to access services would be by car, bike or on foot. The cost of getting children to school from the site with no public transport in perpetuity.	Clyffe Pypard & Bushton Parish Council.
Unsafe unlit access: Access to site unsafe as an unlit, 60mph road.	Cllr Allison Bucknell; Individual x1.
Increase in traffic: Development would remove off-road access to North Farm, resulting in an increased use of local roads for farm vehicles/machinery.	Rj and Nj Clarke Ltd; Individuals x5.
Road is used as rat-run: Breach Lane is regularly used as a cut through for traffic between Royal Wootton Bassett and Calne and traffic does move at or in-excess of 60mph limit.	Individual x1.
Road is not large enough to accommodate large vehicles: Breach Lane is a Class C road and is not suitable to accommodate the largest vehicles that will be required to access the site, as such it should be considered the site would have an unacceptable impact on highway safety.	Individuals x2.
Size of site does not accommodate safe vehicle use: Size of the site does not provide space required to allow safe vehicle use, when taken into account with the 'Designing Gypsy and Traveller Sites Good Practice Guide', as well as accommodate the need to provide 10m hedgerow offsets.	Individual x1.
Alternative access is not fit for purpose: Alternative access if proposal goes ahead is not fit for purpose and would require filling in of ditches and hedgerow removal to ensure clear access/egress on a busy road.	Rj and Nj Clarke Ltd; Individual x1.
Tenant farmer is reliant onsite for access to farm: Tenant farmer is reliant on this field to gain access to 80 acres of the farm, this access would need to be maintained, there is no mention of this in the policy. A suitable	Cllr Allison Bucknell.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
access should be designed to suit all needs, without significantly changing the appearance of the lane. The score for this category should be changed to moderate adverse effects.	
Pedestrian travel from site will be unsafe: Pedestrian travel from the site would be along fast, narrow lanes without streetlighting or pathways.	Engage Technical Solutions Ltd; MFS Resolutions on behalf of Shillings Enterprises Ltd; Clyffe Pypard & Bushton Parish Council.
Use of farm access would harm viability of farm: The farm access from Breach Lane being shared with the traveller site may have a wider impact on the viability of the farm holding.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Separate access will be needed: A separate access will need to be created to ensure the site can be accessed safely, to ensure the existing access to the farm can still be used from Breach Lane. It would not be safe for it to be a shared access, the RAG score should be Moderate Adverse Effects.	Clyffe Pypard & Bushton Parish Council.
Public Right of Way CPYP3: Public Right of Way CPYP3 is located to the south of the proposed site and is not accessible without using Breach Lane. Safe pedestrian access to the site cannot be provided as there are no pedestrian walkways accessing the site.	Individual x1.
Pedestrian travel and safety concerns: No bus services and residents would be walking or cycling on narrow lanes or they would be obliged to use their own private vehicle.	Individuals x2.
Disruption to traffic flow: Significant disruption to traffic flow will occur.	Individuals x2.
Utilities and Drainage	
Financial costs of connecting to mains: Cost to connect to mains power would be high.	Individual x1.
Lack of mains sewer connection: Concern over absence of mains sewerage. Due to the proposed site being on clay, output from any on-site sewerage treatment plant is highly likely to present a risk to local ecology. Any solution removing foul waste on a regular basis would impact the ongoing site costs.	Clyffe Pypard & Bushton Parish Council, Individual x2.
No evidence of drainage strategy: There is no evidence of a drainage strategy to demonstrate the suitability of any of the proposed foul drainage strategy.	Individual x1.
Financial implications of drainage and utility connection: Lack of electricity and mains sewage would present a prohibitive cost to development. No evidence that 'the site can enable off-grid power supply and off-grid foul drainage', as stated in the document, in a sustainable and ecologically sensitive way. This does not meet the criterion to 'provide sufficient drainage measures to manage surface and foul water drainage', as stated in Policy GT3.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
No existing drainage and sewer connections: Site is unsuitable due to no foul water drainage or mains power being available at the site.	Cllr Allison Bucknell; Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council; Individuals x6.
Pumping Station will be required: It appears the site is below the level of the nearest sewer, thus a pumping station would be required, assuming there is capacity.	Individuals x2.
Cost of mains connection will be prohibitive: The policy suggests the site could be served by off-grid electricity generation. The cost of mains connection would be prohibitive. It is not clear what sort of off-grid solution would be effective or required.	Cllr Allison Bucknell.
Challenges with on-site sewage solution: An onsite sewage system would likely need to be installed, due to the existing nearest connection being 0.7km away. There are associated challenges should an onsite system need to be installed. Concerns that any outflow, combined with water run off from highways and saturated land could result in foul water entering local streams.	Cllr Allison Bucknell.
Reed-bed system at full capacity: Bushton has a reed-bed system which is at full capacity, it would not be able to service any potential new development.	Individual x1.
Drainage field will be needed: If the site had a 'small sewage treatment plant, which would need an associated drainage field', and it failed the only possible route for sewage discharge would be the field immediately below the site, the Woodyard business and stabling beyond. The impermeable clay subsoil discounts the possibility of a soak-away arrangement. The increased risk of flooding and/or accidental/negligent sewage discharge from any treatment plant to the business at the Woodyard has not been accounted for and cannot be mitigated against.	Individual x1.
Mains sewer connection is not possible: The development cannot be connected to a mains sewer and no satisfactory alternative foul drainage solution can be achieved.	Individual x1.
Distance from essential infrastructure: Essential infrastructure and services, including foul drainage are 700m away from the site, according to the 'Site Selection Report'.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Lack of infrastructure: No mains power or mains sewerage near the site and the site is below the level of the nearest sewer.	Engage Technical Solutions Ltd; Individuals x2.
Distance from nearest power mains: Nearest mains power is 540m away and possibly prohibitive. It is not clear if there is capacity, therefore a local solution would be required.	Clyffe Pypard & Bushton Parish Council.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<p>Inadequate existing drainage solution: Land drainage system around Breach Lane is already inadequate with surface water settling on the road even after short periods of heavy rainfall. The inadequate diameter of the drainage pipe running under the land outside the Woodyard is responsible. If the capacity of the pipe was increase this would increase the water flow across the land, there is no obvious solution to this issue. Due to clay in the area little rainwater permeates the ground and it drains off the land as surface water.</p>	Individual x1.
<p>Increase in surface water: Increase in surface water from the site would likely impact neighbouring fields and businesses. Possible impact on pond in adjoining field alarming.</p>	Individual x1.
<p>Caravans are vulnerable to flood risk: The site is poorly drained and prone to groundwater flooding. The National Planning Policy Framework notes caravans are particularly vulnerable to flood risk and seeks to steer most forms of development away from such areas.</p>	MFS Resolutions on behalf of Shillings Enterprises Ltd.
<p>Hardstanding site will increase flood risk elsewhere: Hardstanding at the proposed site would speed the run-off of floodwater from the fields and would threaten the woodyard operation. A dwelling nearby to the site was seriously flooded in the summer of 2002 due to the rainwater running off the land towards the dwelling due to the dry clay subsoil.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Incorrectly identified river catchment: In the assessment the site is described as outside the river Avon catchment which is incorrect as it drains into the Brinkworth Brook and ultimately to the River Avon. The likely inability to connect to mains sewage is cause for concern as the risk of contamination could be high, the RAG score should be Major Adverse Effects. The drainage for the north of the site is downhill towards the pond 100m away.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Site is prone to flooding: Site is partial to flooding due to soil being blue clay based and on a south-east slope. Water runs into a maintained ditch system which leads to east side of Bushton village, flooding occurs on a regular basis in two locations on Royal Wotton Bassett Road. The field is within the boundary of the Brinkworth brook catchment, Wessex Water have been working to help maintain areas within the catchment.</p>	Rj and Nj Clarke Ltd, Individual x1.
<p>Roadside ditches are not maintained and therefore increase flood risk: Poor maintenance of roadside ditches have left properties in Breach Lane flooded. There does not appear to be proposals to ensure this is not made worse by the development.</p>	Individual x1.
<p>Surface runoff from roads: Road between the proposed site and the wood yard floods and the necessary hard standing on the site would increase run off to this road, exacerbating the potential and severity of these floods.</p>	Cllr Allison Bucknell; Clyffe Pypard & Bushton Parish Council; Individuals x2.
<p>Contrary to national policy: No detailed surveys have been carried out at the site. The blue clay subsoil is prone to flooding and does not seem to be a good base for residential caravans and day rooms with footings.</p>	Individual x1.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Paragraph 26c of the National Planning Policy for Traveller Sites states 'opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children' which cannot be achieved on a flood prone site.	
Access roads are prone to flooding: Drainage from the field collects on the road alongside it. Bushton was cut off from Royal Wootton Bassett twice last year due to flooded access roads.	Individual x1.
Considerable upgrades required to site drainage: The land is poorly drained and subject to frequent surface water flooding. Considerable changes will be necessary to upgrade the access.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Flood Risk: Floods have been experienced on the road between the proposed site and the Wood Yard. Hard standing on the site would increase the run off to this road area, exacerbating the potential and severity of the floods.	Individuals x2.
Site Design (including privacy)	
Landscape impacts: The site is currently greenfield land and the proposal would adversely change the character and appearance of the surrounding area and the amenity of neighbouring properties. The site could be sensitively designed to mitigate any impact.	Cllr Allison Bucknell; Individual x1.
Does not accord with Good Practice Design Guide: The 'Good Practice Design Guide' shows the layout of each pitch requires a considerable amount of land to accommodate the facilities and playspace with at least 6 metres of separation between each unit of accommodation. Due to the nearest foul drainage connection being 700m away it will have to be provided on site. Any sewage treatment plant must be sited a minimum distance from any residential unit, the 0.5 hectare site will prove inadequate.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Landscape	
Light pollution impacts will be unacceptable: It cannot be considered the site will not have an unacceptable impact on noise and or light pollution due to the residential dwellings less than 350m away.	Individual x1.
Impacts to National Landscape: Development of the site would be detrimental to the North Wessex Downs AONB (National Landscape).	Individual x1.
Visible from National Landscape: The site will be visible from the North Wessex Downs Area of Outstanding Natural Beauty and the raised ground to the south of the site (The Hangings), as well as footpath CPYP3 and those using Breach Lane.	Cllr Allison Bucknell; Clyffe Pypard & Bushton Parish Council.
Impacts to National Landscape: The site is close to an Area of Outstanding Natural Beauty and minimising any impact upon that area's setting should be of paramount importance. A traveller site with urbanising features would be a major incursion into the rural area.	MFS Resolutions on behalf of Shillings Enterprises Ltd.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Development will unacceptably impact the open countryside: Any development of this size in open countryside will have an unacceptable impact, the RAG score of the landscape category should be graded moderate adverse effects.	Cllr Allison Bucknell.
Impact of development: Development would not respect the character of the local area.	Engage Technical Solutions Ltd.
River Quality and Biodiversity	
Ecological impacts: Change of use from agricultural and damaging ecology and is not consistent with sustainability objectives.	Individuals x2.
Known ecological impacts: Site assessment's biodiversity comments identify impacts on ecology and habitats and high-risk area for great crested newts.	Cllr Allison Bucknell, Clyffe Pypard & Bushton Parish Council, Individuals x3.
Biodiversity Net Gain delivery on-site is unlikely: Unlikely that development of this site would deliver 10% Biodiversity Net Gain and would have to be delivered via credits. As such this site should be measured against alternative sites which can deliver Gypsy and Traveller needs whilst achieving on-site Biodiversity Net Gain.	Individual x1.
Does not meet Policy GT3 criteria: Does not meet the sensitive habitats, ecology and sustainability criteria for new Gypsy and Traveller sites set out in Policy GT3.	Individual x1.
Adverse ecological impacts onsite and elsewhere: Development will have a detrimental effect on ecology and habitats on site and in the immediate surrounding areas.	Individual x1.
Foul water disposal may impact biodiversity: Foul water disposal could well effect biodiversity of the flora and fauna of the area together with the environmental balance of the nearby pond.	Cllr Allison Bucknell; Individuals x2.
Site incorrectly identified in River Avon Catchment: The assessment of the site incorrectly states that it lies outside of the River Avon catchment. The field drains through various ditches down to the Brinkworth Brook which leads to the River Avon. The score should be amended to red.	Cllr Allison Bucknell.
No protections against wildlife: The assessment assumes mitigation in relation to biodiversity challenges can be dealt with, however if the site is sold to potential occupants local experience shows that there is no power within the planning process and conditions to protect local wildlife from irreversible damage.	Individual x1.
Historic field pond adjacent the site: The site is recognised in the Plan as an 'ecologically sensitive site'. A field pond on the land adjacent is of significant ecological importance with historical mapping indicating it has existed for hundreds of years.	Individual x1.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
10-metre buffer will limit development: The site is constrained by its 'ecological sensitivity', and for this reason the maximum allocation is no more than 0.5 hectares. A 10-metre buffer around the sites hedgerow boundaries will also reduce the developable area further.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
The site cannot contribute to Biodiversity Net Gain: The site cannot contribute to Biodiversity Net Gain, it does not make it clear who would pay for biodiversity activity elsewhere to achieve neutrality.	Cllr Allison Bucknell, Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
Unclear if Biodiversity Net Gain has been considered or costed: The Site Selection Report calculates that to provide all of the facilities for the pitches, a site with 0.66 hectares will be required. The statutory requirement for Biodiversity Net Gain will have to be provided off-site. It is unclear if this has been considered or costed (National Planning Policy Framework states development must be 'viable') as the replacement biodiversity land needs to be in the close vicinity and of equivalent type.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Site is unsuitable due to unavoidable ecological harm: The Site Selection Report identifies the development 'would have impacts on ecology beyond the site boundaries' and impacts on ecological habitats 'would be difficult to avoid', this should demonstrate the site is unsuitable for development.	Clyffe Pypard & Bushton Parish Council.
Damaging the ecology is not consistent with sustainability objectives: Changing from agricultural use and damaging the ecology is not consistent with sustainability objectives.	Individuals x2.
Scale	
Site will dominate the locality: The site is close to the proposed emergency stopping site which would constitute a significant increase in local concentration of sites. This will dominate the local community, lead to local resentment and potential conflict with the settled community.	Individuals x3.
Size of site is unsustainable: The proposal is unsustainable as the developed area of the proposed site is 1,560 sqm, representing 24% of the 6,600 sqm land required.	Individual x1.
Site is larger than necessary: The 0.5 hectare proposal for three pitches is larger than necessary for this number of families and would result inevitably expanding beyond the three pitches. It cannot meet the criteria for 'most efficient use of land'	Individual x1.
Other Issues	
Brownfield sites are preferable: Brownfield sites should be identified in preference to greenfield sites.	Individuals x2.
Delivery costs: No delivery costs for council owned sites have been considered.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Council-owned land: Opting for public or council owned land seems to have been given higher priority.	Individual x1.
Unfairness of planning system: Lack of fairness in planning system because a change of use to non-traveller residential use would be refused.	Individual x1
Removal of site: Suggested removal of GT24 Bushton North Farm.	Individual x1
Site does not meet Objective 3: Bushton North Farm does not meet Wiltshire Council's own threshold, specifically Objective 3, for inclusion in the plan as a proposed site.	Individuals x2.
Lack of consultation with landowners and tenant farmers: Site assessed without any site visit or consultation of tenant farmer.	Individuals x2.
Financial impacts to tenant farmer: Proposal will have financial and unsustainable implications on the tenant farmer.	Rj and Nj Clarke Ltd; Cllr Allison Bucknell; Individual x1.
Impact on local area: A new site could impact negatively on the local area.	Individual x1.
Loss of good quality Agricultural Land: Making this site allocation will require Grade 2 productive farmland being taken out of production, and possibly adjoining land to accommodate required Biodiversity Net Gain and sewage treatment facilities.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
More suitable brownfield site alternatives: In relation to the question is the Plan justified and does it take into account reasonable alternatives, it is felt it does not. The land is owned by Wiltshire Council and by using this land it is considered the easy option to meet legal requirements at low cost when there are a number of more suitable brownfield sites that could be used.	Clyffe Pypard & Bushton Parish Council.
Isolated from key services: Site isolated from services, particularly medical and schooling, which makes the site unsustainable.	Cllr Allison Bucknell; Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
Lack of street lighting: Concerns raised over a lack of street lighting in the area and also the impact of lighting from the development to promote security and provide safe access. The National Planning Policy Framework makes clear (paragraph 191) that the impact of light pollution from artificial light must be properly controlled. There is no evidence within the consultation documentation that this exercise has been done.	MFS Resolutions on behalf of Shillings Enterprises Ltd.
Isolated from essential services: The site is unsuitable for this use due to isolation from essential services. It is not justified by evidence, it is ineffective and inconsistent with national policy. The proposed allocation for three pitches is therefore unsound in relation to paragraph 35 of the National Planning Policy Framework, the proposal should not be retained within the document being put forward for public examination.	MFS Resolutions on behalf of Shillings Enterprises Ltd.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Will lead to population increase: If the site of Clyffe Pypard site is approved with North Farm, the population of the parish could be increased by over 10%, and together with the effect of the proposed Thickthorn site, the area would appear to be being treated disproportionately.	Individuals x2
Concerns over impact of development on existing infrastructure: The proposal is not in accordance with paragraph 25 of the National Planning Policy for Traveller Sites.	Individual x1.
Lack of consultation with tenant farmer: National Planning Policy for Traveller Sites 2023 (paragraph 13a) requires that policies 'promote peaceful and integrated co-existence between the site and the local community'. Prior to this consultation there has been no discussion with existing residents or the tenant farmer to identify issues with the proposed site. Without such discussions local knowledge and current experience have not been taken into account or learned from.	Individual x1.
Will result in tensions between settled community and travellers: Development would not respect the character of the local area.	Engage Technical Solutions Ltd; Clyffe Pypard & Bushton Parish Council.
No consultation with tenant farmer: There has been no consultation with the tenant farmer whose livelihood is dependent on Bushton North Farm, it is unclear if the site was ever visited by planners. The local community have not been consulted, failing to follow the national Planning Policy for Traveller Sites.	Clyffe Pypard & Bushton Parish Council.
Does not account for unauthorised site at Clyffe Pypard: With the proposed site, the unauthorised site at land north of 34-49 Clyffe Pypard, two further occupied sites on the Bushton to Calne Road and the proposed transit site at Thickthorn the number of sites within this community is already excessive and counter to national Planning Policy for Traveller Sites. It is clear that sites in rural areas respect the scale of the nearest settled community, but the site does not meet this guidance. The score for the scale category should be Moderate Adverse Effects.	Clyffe Pypard & Bushton Parish Council.
Assessment status should be amended: The site assessment score should be considered red overall due to unsafe access for pedestrians and cyclists, vehicular access and increased traffic, site design, landscape, biodiversity net gain and hedgerow/tree concerns and the location of the existing residential houses (which are stated in the report as being 1km away from the site, they are 350m from the site).	Individual x1.
Population increase: The population will increase in the area with the proposed site at Thickthorn.	Individuals x2.
Lack of amenities: No amenities (school, shops, medical etc) within several kilometres of the proposed site.	Individuals x2.
Sustainability Appraisal	
Site doesn't score well: Poor sustainability appraisal, ranking 22nd out of 27 sites.	Individuals x2.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
Objective 1: Objective 1 should be reassessed as moderate adverse effects, due to the drainage, surface water and reliance on motor vehicles.	Cllr Allison Bucknall.
Objective 2: Objective 2 should be reassessed as moderate adverse effect due to the loss of grade 3 agricultural land with no mains services.	Cllr Allison Bucknall.
Objective 8: Objective 8 should be reassessed as moderate adverse effect as the construction of a 0.5 hectare site with 6 caravans and 3 days rooms will be a significant unwelcome encroachment on the Wiltshire landscape.	Cllr Allison Bucknall.
Objectives 10 and 11: Objectives 10 and 11 should be reassessed as moderate adverse effect as the site is remote from major services and there is no public transport choices.	Cllr Allison Bucknall.
Objective 12: Objective 12 should be reassessed as moderate adverse effect as the site offers poor access to education and training facilities and poor employment prospects.	Cllr Allison Bucknall.
Site is incorrectly assessed: It is contested that several of the categories have been incorrectly assessed and the SA score should be much lower. The site is not sustainable and if an application had come before committee it would have been refused flatly on this basis alone.	Cllr Allison Bucknall.
Score for utilities and drainage: The green score relating to points 3 and 4 (utilities and drainage) do not reflect the reality on the ground and should both be red.	Individual x1.
Objective 1: Objective 1 should be rated as Moderate Adverse Effects given the issues with connection to mains sewage, surface water run off leading to the River Avon and access to amenities will have to be by car.	Clyffe Pypard & Bushton Parish Council.
Objective 2: Objective 2 should be Moderate Adverse Effect as it is grade 3 agricultural land. The potential concreting of over 24% of this site and its complete loss cannot be Minor Adverse Effect, which diminishes the sustainability case for the site.	Clyffe Pypard & Bushton Parish Council.
Objective 3: Objective 3 should be Moderate Adverse Effect. The site is not in a protected drinking area, the comment that 3 pitches will not adversely affect surface and ground water trivialises the situation. Risk of surface and ground water contamination is high due to likely inability to connect to main sewage. Concern raised over delays in enforcement which may result in contamination of the area for a significant time before action is taken.	Clyffe Pypard & Bushton Parish Council.
Objective 7: Objective 7 is graded as neutral, however the creation of the site viewable from the AONB cannot be neutral. The statement in the plan regarding site layout, design and landscaping helping reduce any adverse effects trivialises in favour of the plan and the impact the site will have on the current landscape. The pitches with caravans, day rooms and solar panels will have an impact on the landscape so a neutral grading is incorrect.	Clyffe Pypard & Bushton Parish Council.

Key issues raised (Policy GT24 - Bushton North Farm)	Respondent(s)
<p>Objective 8: Objective 8 should be Moderate Adverse Effects. The statement regarding the site not encroaching on the local landscape setting or resulting in the loss/harm to existing important landscape features, as with SA7, it is unclear how it can be described as not encroaching.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Objective 10: Objective 10 should be Moderate Adverse Effects. Compared with other allocations they have shorter distances to amenities and these have been graded as Moderate Adverse Effects. The assessment is minimising the sustainability assessment effects in favour of a positive outcome.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Objective 11: Objective 11 should be Moderate Adverse Effects. The site entrance would be onto a class C road, a new entrance would be required due to the busy farm entrance, which would require removal of around 25m of hedgerow. The other two factors of access to sustainable modes of transport and to minimise need to travel to essential services cannot be met.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Objective 12: It is acknowledged that the site offers poor access to education and training facilities and poor employment prospects it is only graded as Minor Adverse Effects whereas Bridge Paddocks has identical wording but is graded as Moderate Adverse Effects.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Weighting of Sustainability Appraisal has bias: The Sustainability Appraisal is weighted towards minimising the issues of remoteness from facilities and the impact on the landscape. Based on scores of other similar sites in the plan a more consistent score is -7 with a case to increasing to -9, and if all comments on the site were agreed the score would be -11. When comparing to similar sites a score of -7 shows the site to be sustainably unsuitable.</p>	Clyffe Pypard & Bushton Parish Council.
<p>Sustainability objectives: Does not meet sustainability objectives.</p>	Individuals x2.

Table 5.36 Policy GT25 - Land at Housecroft Farm 1 key issues

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Highways and Transport (including Access)	
Existing traffic concerns: The site is not an appropriate site due to existing traffic and traffic safety concerns due to commuting.	Individuals x10
No access identified: There is no access to the site identified in the plan, including safe pedestrian access.	Individuals x7; Edington Parish Council
Lack of public transport: No public transport to and from the site.	Individuals x3.
Access to agricultural land: Housecroft 1 proposes using an existing agricultural access, which is overgrown but still in place. This is the only agricultural access to the Housecroft Estate fields from the Bratton Road. While not currently in use, this does not mean that agricultural access will not be required from the Bratton Road in future.	Individual x 1.
Utilities and Drainage	
Telecoms: Very poor phone and internet signal at the proposed sites.	Individuals x11; Edington Parish Council.
Utilities: The cost of installing new utilities for the site would be too high to justify.	Individual x1.
Drainage: The site has poor drainage.	Edington Parish Council.
Site Design (including Privacy)	
Close proximity to six other existing gypsy and traveller sites: Housecroft 1 and Housecroft 2 sites are in close proximity to six other existing gypsy and traveller sites one of which is proposed for intensification.	Individuals x2.
Unsuitable location: Site would be unsuitable for normal housing development.	Individual x1.
Poor access to health facilities: The nearest GP surgery is only open part time. Next closest is in Westbury which is approx 9km from the site. Key facilities such as shops and schools and health services. This requirement is set out in the National Planning Policy Framework.	Individuals x19; Edington Parish Council.
Existing nearby sites: Understand that there are already approx six Gypsy and Traveller sites within the vicinity of Edington.	Individuals x11.
No options for further expansion: The proposed number of pitches is the maximum that the site can handle, as per the sustainability analysis. Therefore the site cannot be expanded.	Individual x1.

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Landscape	
Loss of Agricultural land: Proposal will result in loss of land from farm for grazing. Mitigation will still lead to impacts to this.	Individuals x6; Edington Parish Council.
River Quality and Biodiversity	
Protected species: Owls and bats have been sighted near to the Site and the development may affect their habitats. The land provides ecological value.	Individuals x6; Edington Parish Council.
Landscape: The development will harm the landscape especially from lighting impacts.	Individual x1.
Planting: Existing hedgerows have had additional planting of native species to them by farm tenants and therefore the habitat value of the site has not properly been assessed.	Individuals x2.
Incorrect assessment of the site: Incorrect assumptions about the 'low' biodiversity of the Site. Concerns that biodiversity hasn't been properly assessed.	Individual x4; Edington Parish Council.
Other	
Unaware of proposals: Some members of the community were unaware of the plans set out in the Plan.	Individual x1.
Withdraw allocations: The site should be withdrawn from the Plan.	Individual x1.
Intensification is preferred: Existing sites should be increased instead of developing new sites.	Individual x1.
Neighbourhood amenity: Development would potentially harm residential amenity in the village.	Individual x1.
Unsuitable family plots: Plots will be unsuitable for families who are intended to use this site.	Individual x1.
Carbon neutrality: The developments are not carbon neutral.	Individual x1; Edington Parish Council.
Does not accord with other policies: The policy does not accord with Objective 3 of Policy GT3.	Individuals x3.
Brownfield would be a preferred approach: Brownfield sites at industrial estates in Westbury and Trowbridge should be considered.	Individuals x2.
Viability impacts to neighbouring businesses: Development may impact the viability of neighbouring businesses.	Individual x1.
Duty to Cooperate: There is no evidence that Wiltshire Council has had made meaningful consultation with the relevant authorities.	Individual x1.

Key issues raised (Policy GT25 Land at Housecroft Farm (1))	Respondent(s)
Unsustainable level of mitigation: Level of mitigation requires is too large for a small development.	Individuals x4.
National Planning Policy compliance: The policy does not comply with national planning policy.	Individual x1.
No proposed monitoring scheme: No clear monitoring scheme proposed to ensure that occupants of these sites meet the planning definition of Gypsies and Travellers.	Individuals x7.
Sites do not meet Objective 3 of the plan: Neither Housecroft sites meets Objective 3 of the Plan.	Individual x1.
Sustainability of the site: How can these sites be considered 'sustainable' when the size, mitigation and cost will only support two pitches and can only support two pitches in the future.	Individual x1.

Table 5.37 Policy GT26 - Land at Housecroft Farm 2 key issues

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Highways and Transport (including Access)	
Poor public transport access: No access to public transport, sewage network, or medical facilities nearby which will lead to reliance on cars.	Baker-Gadd Partnership; Individuals x4.
Traffic concerns: The site is not an appropriate site due to existing traffic concerns due to commuting.	Individuals x8; Edington Parish Council.
Pedestrian access: The site will not have good or safe pedestrian access.	Individuals x5; Edington Parish Council.
Narrow access: Roads are very narrow near to this site which leads to road safety concerns for pedestrians.	Individuals x5.
Highways safety: The site is located on a remote country road with national speed limit as quoted in the Site Selection Report, and where accidents occur frequently. There are no footpaths and there is no lighting which is inconsistent with the highway/transport criterion in Policy GT3.	Individual x1.
No connections to transport or key infrastructure: The proposals are on greenfield sites with no public transport links, they are not close to amenities and there is no mains sewage. There is a shortage of medical services in this area and they are out of keeping in this rural area.	Individual x1.
Utilities and Drainage	
Need for adequate drainage solution: There is no ditch down the north side of the Steeple Ashton to Edington road between the proposed site and the mile stone layby above Ivy Mill Farm, if there is no adequate drainage solution on site then flooding will be increased downhill.	Individual x1.
Poor drainage on-site: Local knowledge would indicate that the clay soil on this site has very poor drainage capability. Water runs from the site either to a nearby ditch or on the roadside. The natural levels of the land makes the risk of contamination of the nearby Milebourne Brook more likely. Infiltration in the winter months would be minimal. The neighbouring land has standing water on it each winter despite a comprehensive drainage system. Surface water run off does occur and adds to pollution risk and flooding risk off neighbouring land.	Individual x1.
Site is not suitable for soakaway drainage solution: The land is not suitable for a soakaway solution so drainage would need to be provided in other ways.	Individual x1; Edington Parish Council.
Telecoms: Broadband connections in the village are limited in their quality and many homes have to use Wi-Fi boosters.	Individuals x3; Edington Parish Council.
No Sewerage connection: There is no on site mains sewage connection.	Individual x1.

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Site Design	
Undue Intensification: This proposal constitutes an undue intensification of the site.	Individuals x2.
Intensification: Intensification of existing sites would be more preferable.	Individual x1.
No opportunities for further expansion of site: The supporting documents state that the proposed development would constitute the maximum capacity for the site meaning it couldn't expand further.	Individual x1.
Neighbourhood amenity: Development would potentially harm residential amenity in the village.	Individual x1.
Landscape	
Landscape: The development of the site will adversely impact the landscape.	Individuals x2.
Site identification approach: Development should not be located on undeveloped greenfield land and instead should be extensions of existing Gypsy and Traveller sites. This is inconsistent with planning policies related to residential development.	Individuals x6.
Alternative brownfield sites: Brownfield land at industrial estates in Westbury and Trowbridge should be considered instead.	Individuals x2.
River Quality and Biodiversity	
Insufficient ecological mitigation: The development will impact existing wildlife nearby to the site and the planting of hedgerows will not mitigate this.	Individuals x5; Edington Parish Council.
Other	
Excessive number of existing sites nearby: Too many sites proposed in this local area.	Individuals x7.
Need for monitoring scheme: No clear monitoring scheme proposed to ensure that occupants of these sites meet the definitions of Gypsies and Travellers.	Individual x1.
Carbon neutrality: The development is not carbon neutral.	Individual x1; Edington Parish Council.
Wiltshire Climate Emergency Strategy: The policy does not support the aims and objectives of the Wiltshire Climate Emergency Strategy.	Individuals x2.
Lack of nearby key facilities: There no facilities such as shops, employment or health facilities within close proximity of the site, these would need to be accessed via car.	Individuals x17; Edington Parish Council.

Key issues raised (Policy GT26 Land at Housecroft Farm (2) Edington Road, Edington)	Respondent(s)
Inconsistent and unjustified: The plan is inconsistent with national planning policy and is also unjustified.	Individuals x2.
Unsustainable level of mitigation: Level of proposed mitigation for the site is unsustainable and the financial requirements of such would make the site unviable.	Individuals x7.
Lack of communication of consultation: Some members of the community were unaware of the proposals set out in the Plan. The consultation document is difficult to read.	Individuals x2.
Core Organic Farm: The site is a core organic farm and the development will impact its viability.	Individuals x7.
Viability impacts: Proposed site may impact the viability of neighbouring businesses.	Individuals x1.
Access to healthcare: In relation to accessibility of health centres, the site falls outside the search area defined in the Site Selection Report. The Bratton Surgery only has part time hours so residents would need to access White Horse Health Centre in Westbury.	Individual x1.
Impact on the local area: The site does not comply with Policy GT3 as additional sites could impact the local area.	Individual x1.
Potential impacts on residential amenity: Development could impact upon residential amenity.	Baker-Gadd Partnership.
Sustainability Appraisal	
Sustainability Appraisal: The Sustainability Appraisal has not properly assessed the existing biodiversity of the site.	Individuals x7.
Sustainability of sites: How can these sites be considered 'sustainable' when the size, mitigation and cost will only support two pitches and can only support two pitches in the future.	Individual x1.

Table 5.38 Policy GT27 - Land at Cleverton, Cleverton key issues

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Highways and Transport (including access)	
Poor public accessibility: Lack of footpaths and infrequent bus services. Any travel to essential services would need to be done by car.	Individuals x2.
Traffic congestion: The roads are already congested during peak times.	Individuals x2.
Highways England response: Responses to the Regulation 18 Consultation from Highways England did not account for Policy GT27.	Individuals x1.
Poor bus services: Bus services are irregular and provide poor connection to higher order settlements Great Somerford and Malmesbury.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
On-street parking is not preferable: We do not want more vehicles parking along the roads and verges.	Individual x1.
Visibility is insufficient: Further visibility than 160m will be required as vehicles travel 70mph and not 50mph. 160m is not achievable because of road curvature and verge topography. Safe vehicular access cannot be achieved based on distances measured from the access point, which is inconsistent with Policy GT3(iv) in the Plan.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Increase in vehicular movements: There may be 600-900 vehicle movements per week from the site onto a fast B-road due to the lack of public transport and the number of on-site residents including teenagers, business vans and lorries etc.	Individual x1.
Lack of pedestrian infrastructure: No pedestrian infrastructure is available nor is there any street lighting.	Individuals x9, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Unsafe accessibility: The lack of safe accessibility does not give adequate consideration to the needs of all transport users, accordingly to the established hierarchy: Visually impaired or disabled; pedestrians; cyclists.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Reliance on cars: Pedestrian access is not achievable in this location, exacerbating future occupants' reliance on private vehicles to access services and facilities, and contrary to national strategies for sustainable development. Verges are narrow and uneven and a pavement couldn't be installed safely. It is therefore incorrect	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
for the Site Selection Report to conclude that all types of highway user can safely access the site subject to mitigation.	
No safe pedestrian access: Lack of safe and suitable access for pedestrians contravenes paragraph 108(c) of the National Planning Policy Framework.	Individual x1.
Unsafe pedestrian access: The verges are bordered by deep surface water drainage ditches and it is unsafe to walk along the B4042 given prevailing speeds of 70mph. This contravenes criterion iv) in Policy GT3.	Individual x1; Elected member x1.
Encouraging private car use: In connection with the unauthorised stationing of buses, Section 4d of Enforcement Notice No. ENF/2023/0388 identifies the location as unsustainable and encouraging the use of the private car in contravention of Wiltshire Core Strategy Policies 60 and 61 and Section 9 in the National Planning Policy Framework 2021.	Individuals x2.
Traffic increases: The site will generate truck and caravan movements in addition to private cars and the enforcement case demonstrates the unsuitability of the site access.	Individuals x4; Elected member x1.
Traffic increase: The development would result in additional vehicle movements on the Hill and the junction with the B4042 and increase pressure on local roads.	Individuals x2.
Public Transport: There is no public transport.	Individual x1.
Road accident history: Crash map evidence shows 24 no. road traffic incidents over the decade to 2022 in the vicinity, three of which were identified as serious.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Impacts to existing road network: On the basis of 80 vehicle trips per day it is highly unlikely that a safe means of vehicular access can be secured to service the site and quantum of development proposed without harm to the local highway network and its existing users.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x1.
No consideration of vehicle trip numbers: Taking into account other types of vehicle movements and teenage children's accommodation needs which the plan doesn't consider, vehicle trips may amount to 90 or more per day.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Lack of existing facilities: The village lacks necessary facilities to manage the development including waste, health, sanitation and essential services.	Individuals x5; Elected member x1.
Reliance on cars: Residents would have to use the car to reach all necessary services and facilities.	Individuals x2; Elected member x1; Agent on behalf of x1 individual.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Pressure adding to existing key facilities in Malmsbury: Development would add pressure on overstretched local doctors surgeries, and the secondary school at Malmesbury.	Individual x1.
Access to services: Travellers would have insufficient access to services, facilities and amenities.	Individual x1.
Lack of access to sustainable transport: Site is inconsistent with Policies CP60 and CP61 of the Wiltshire Core Strategy and paragraph 4(j) of the national Planning Policy for Traveller Sites. Development is unlikely to obtain planning approval because of the lack of access to sustainable transport in contravention of local and national planning policy. This raises doubts as to the soundness of the Plan.	Agent on behalf of x1 individual; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Utilities and Drainage	
Flooding: Little Somerford as a flooding problem when water washes down from the hill where the site is, this will be exacerbated by effluent run-off from the development as there is no sewer.	Individuals x7.
Utilities infrastructure: There are no services (water, sewer, power) to the site.	Individuals x3.
Sewerage: Sewer connection would be facilitated via third party land and is extremely unlikely.	Individuals x5; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Existing sewer is overcapacity: The 150mm sewer on 'The Hill' is running at over capacity with blockage and overflowing problems after heavy rain.	Individuals x8; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Ditches: Ditches need to be kept clear of debris to enable free flowing of rainwater drainage, how will this be achieved?	Individual x1.
Water Pressure: Water pressure is already low in this area of Cleverton.	Individual x1.
Sewage pollution risk: There is a sewage pollution risk to public health and private homeowners.	Individuals x4.
Impermeable soil: The soil on the site is low permeable-impermeable dense clay, floods during the winter months. The soil on the Hill and on the site becomes unstable and water flows into the village which has resulted in flooding during winter months.	Individuals x10; Elected member x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Geology: The site is in a highly vulnerable location for flooding due to the underlying geology (National Planning Policy Framework Annex 3).	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Assumptions of occupation rates are inaccurate: The assumption that 2.5 people live on a pitch is wrong. It should be 4-6 people, so the on site sewage plant would be under-designed. The drainage field should be 1,500 sqm and not 625 sqm as stated in Appendix 1 to the Site Selection Report.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Insufficient proposed sewerage infrastructure: A sewage treatment plant will fail to function and contaminate the ground both locally, down to the village and into the River Avon. This is inconsistent with paragraph 13(f) of the national Planning Policy for Traveller Sites.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Soakaway solution: The flooding and ground instability issues mean that a soakaway system will not work and therefore undeliverable, would result in financial and environmental costs. Policy is inconsistent with paragraph 13 of the national Planning Policy for Traveller Sites.	Individuals x4.
Does not accord with national policy: Flood risk also means the site is not in accordance with Annex 3 of the National Planning Policy Framework and Core Policy 47 of the Wiltshire Core Strategy.	Individual x1.
Pollution: Pollution from the proposed development flowing through the brook down The Hill would create a potentially serious risk to public health, as well as creating noxious smells, something that the local water board (Wessex Water) have had to deal with on a number of previous occasions.	Individuals x3.
Unclear if site will be self-sufficient: Given the demand for on-site power to support 10 pitches, concerns raise over whether this be achieved and whether the occupiers of the site will resort to using bottled gas and generators if the cost of upgrading the electrical infrastructure is prohibitive.	Individuals x2.
Water Stressed Area: Regulation 18 Consultation Report feedback from the Water Utility provider has stipulated that the area is classified as “Water Stressed”, so further addition of water services to new inhabitants fails to consider the risk to water supply.	Individual x1.
Duty to Cooperate not met: Insufficient joint working was undertaken with utility infrastructure providers under the Duty to Cooperate given the water supply and drainage issues.	Individual x1.
Surface-water runoff: Site is located on impermeable clay which will increase surface water runoff. Numerous flooding events have been reported in this local area.	Individual x7; Lea, Garsdon, and Cleverton Parish Council.
Site Design (including privacy)	
No access layout has been provided to date: No layout and design of vehicular access has been provided. The visual impact of change of use will change the landscape character viewable from the property on the eastern boundary and no consideration has been given how this will be compensated for.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Impacts to appearance of village which goes against Conservation Area Statement: GT27 would have a detrimental effect on the appearance of the village of Little Somerford. It is contrary to the Guidance Recommendations for the Upper Part of The Hill in Little Somerford's Village Design Statement and Conservation Area Statement, which was adopted as Supplementary Planning Guidance on 25th July 2002.	Individual x1.
Overlooking: Site would be overlooked by adjacent properties resulting in inadequate levels of privacy.	Individual x1.
Neighbouring property will be left exposed: The property on the eastern boundary would be made completely vulnerable and exposed due to the lack of mitigation measures such as landscaping, buffers, hedgerow planting and fencing which has been afforded to the southern and western boundary.	Individual x1.
Landscaping may not be effective: On site planting may not work given the waterlogged nature of the site and there is no evidence how landscaping will be maintained, or prevent removal in the future.	Individual x1.
Third Party access rights: Third party access rights affect the land.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Existing Third Party Access rights: Third party access rights would make it impossible to screen the eastern boundary.	Individual x1.
Density is too high: The new site would create pitches close together which would be at odds with existing development which is of low density.	Individual x1.
Greenfield development does not accord with the Core Strategy: The site is agricultural land, it has not been previously developed and is not a derelict site as required by Core Policy 47 in the Wiltshire Core Strategy.	Individuals x2.
Incompatible with Conservation Area: Incompatible with Little Somerford Conservation Area.	Individual x1.
Site will be visible when hedgerows do not leaf: During the six months of the year when the current mature hedgerows and trees are not in leaf, neighbouring properties are in direct line of sight of the proposed site.	Individuals x5.
Urbanisation of landscape: The site would urbanise the rural landscape, including infrastructure developments and mitigation measures screening measures such as earth bunds, fences and non-native hedgerow and tree species.	Individuals x3.
Privacy: Adequate privacy could be provided only by introducing inappropriately high fences and hedges which would further impact on road safety.	Elected member x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Screening will lead to separation: Site screening would isolate occupants which would not accord with the requirements of the Planning Policy for Traveller Sites.	Individual x1.
Impacts to privacy of residents: The development would have unacceptable impacts on the privacy and residential amenity of property owners adjacent to the site in terms of noise, fumes and light pollution, and mitigation measures proposed in the policy are insufficient to address the issues.	Individuals x2; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Scale is unjustified: The scale of development in terms of pitches and population is unsound and unjustified when considered against Noise Policy Statement for England because it does not demonstrate the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy.	Individual x1.
Short-medium term impacts of hedgerow planting: Hedgerow removal and replanting would result in short to medium impacts and would be inconsistent with Core Policy 51 of the Wiltshire Core Strategy.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individuals x2.
Public Right of Way: A public right of way (LSOM1) runs close to part of the southern boundary of the site. Enhanced hedgerow planting on this boundary will not prevent the site from being visible for six months of the year when the hedgerow is not in leaf, and noise from the site will disrupt the enjoyment of LSOM1 by walkers, contrary to the National Planning Policy Framework (paragraph 104).	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individual x2.
Cumulative impacts with unauthorised site: Development of the site would magnify adverse effects from current unauthorised use on neighbouring property in terms of noise, visibility and amenity.	Individual x1.
Landscape	
Increase in pollution: As this is a rural area, the nights are particularly dark and therefore the development will increase light pollution in the area.	Individuals x2.
Harm to quiet area: As this is a very quiet area development will increase noise pollution impacting the surrounding area.	Individuals x3.
Substantial noise pollution: The noise nuisance experienced as a result from the unauthorised use will substantially increase if 10 pitches are developed.	Individual x1.
Development would be clearly visible: The development would be clearly visible from the road and nearby footpaths and would substantially alter the character of the area.	Individual x4; Lea, Garsdon; and Cleverton Parish Council.
Adverse impacts to village's character: The site could disrupt the rural character of the village.	Individuals x2.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
The site is part of a dark sky landscape: The site meets the national definition of dark landscape. There is no light pollution from this site at the moment but this would change as a result of development.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Light pollution: Light pollution would affect neighbouring properties during evenings and nights all year.	Individuals x3.
Increase in traffic and pollution: The site will lead to increased traffic, noise, car fumes, and strain on local resources affecting the quality of life for local residents.	Individuals x3.
Air Quality impacts to surrounding properties and no buffer zones proposed: The property on the eastern boundary would be exposed to poor air quality as a result of development including petrol diesel, paraffin fumes, sewage waste, household waste. There seems to be a lack of due diligence on part of the Council to consider this in the policy requirements, for instance there is no mention of buffer zones and separation distances.	Individual x1.
Failure to consider North Wiltshire Landscape Character Assessment: Development would offend Policy CP51 as it fails to consider the North Wilts Landscape Character Assessment which identifies a rich evidence of archaeological features and a largely medieval field pattern, local landscape features including mature hedgerows, trees etc.	Individual x1.
Harm to open-countryside landscape character: The land is open countryside, elevated and characteristic of Little Somerford and Cleverton. The proposed allocation would harm the landscape character of the villages and this could not be mitigated by the measures proposed in the policy.	Individuals x9.
River Quality and Biodiversity	
Great crested newts: Protected species have been observed in neighbouring properties including great crested newts, their habitats therefore may be impacted by the development, noise and light pollution.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Protected species: The presence of protected species makes this site inconsistent with the National Planning Policy Framework (paragraphs) 180, 185, 191) and the national Planning Policy for Traveller Sites (paragraphs 4(k) and 10).	Individual x1.
Enjoyment of wildlife and area: Wildlife forms part of the enjoyment and amenity of living in the area and would be disturbed and discouraged by any development of the site.	Individuals x2.
Significant Biodiversity Loss: Developing this site would result in significant adverse loss of/destruction of biodiverse habitat and valued farmland that is vital for the protection of decreasing insects, plants and animals; food production; carbon capture and community health and wellbeing.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Rare wildlife: The fields surrounding Little Somerford support a broad range of wildlife some of which is very rare.	Individual x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Brownfield Land: Alternative solutions such as brownfield sites should be explored.	Individuals x2.
Ponds: The site includes two mere ponds and is home to several protected species, including but not limited to butterflies, birds and Great Crested Newts and without ecological surveys buffers cannot be evidenced.	Individual x1.
Does not allow for protection of ecological features: The development of pitches, internal access, parking and turning will not allow for adequate protection of the ecological features.	Individual x1.
Lack of avoidance and mitigation measures: The allocation does not incorporate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. It does not demonstrate it meets the requirements of the national Biodiversity Action Plan and Biodiversity Net Gains. It is not compliant with Core Policy 50 of the Wiltshire Core Strategy.	Individual x1.
Alternative Ministry of Defence site: Ministry of Defence land at Lyneham should have been investigated.	Individuals x2.
Scale	
Scale of Little Somerford is unsuitable for this site: Little Somerford is not considered to be a sustainable location as it is not defined as a settlement in Core Policy 1 of the Wiltshire Core Strategy. Most services are at Great Somerford and Malmesbury so the site does not comply with CP47. The scale and character of Little Somerford will be affected.	Little Somerford Parish Council.
Domination of nearest settled community: The proposed site should not dominate the nearest settled community.	Individuals x2.
Consultation has caused distress and social tension: The proposal has created undue pressure on the settled communities causing distress and social tension due to the impacts the site would have on the local community.	Individuals x4; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Site will dominate settled community: The proposed Gypsy and Traveller site will dominate the local settled community and the wider community of Little Somerford and Cleverton given the number of 40-60 residents on site compared to the number residents in Cleverton and Little Somerford.	Individuals x10; Elected member x1; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Impacts to neighbourhood amenity: The site will unacceptably impact and cause the loss of amenity to the adjacent neighbouring properties.	Individuals x5, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Inconsistent with Wiltshire Core Strategy: The scale of growth is not consistent with Core Policy 1 when considered against the number of new dwellings that have been constructed in Little Somerford in the past 20 years.	Individual x1.
Inconsistent with Wiltshire Core Strategy: The WCS does not identify Cleverton or Little Somerford as settlements within Core Policy 1; 'settlement strategy'. The impact of development of site GT27 will be to append a significant quantum and intensity of residential pitches to a loose collection of existing dwellings in an area where the LPA have held a policy of strict restraint on development.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
No evidence of affordable plots being considered: Policy D 'Rural exception sites' provides the LPA with the opportunity to allocate small sites as affordable traveller pitch locations to address the needs of existing members of the (travelling) community resident in the area. There is no evidence presented in justification of the allocation of site GT27 that such a need exists in this location.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals.
Does not accord with national policy: The allocation doesn't accord with national planning policy, which requires that local planning authorities to ensure that the scale of rural and semi-rural sites should not dominate the nearest settled community.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206 individuals; Individual x1.
Lack of pitches: Lack of pitches could lead to increase the number of site residents.	Individual x1.
Other Issues	
Query regarding intention to replace Wiltshire Core Strategy Policy CP47: Query how can a Plan replace a policy.	Individual x1.
Inconsistent with National Policy: The allocation is inconsistent with PPTS.	Individual x1.
Site Assessment Criteria: The plan did not assess the 7 new sites against the criteria in national and local policy	Individual x1.
Imbalance in location of allocations: There is an imbalance of traveller sites in north west Wiltshire when compared to the rest of the county.	Individual x1.
Sites located outside of settlement limits: Site is outside limits of development and hence inconsistent with the strategic policies in the Wiltshire Core Strategy.	Individuals x2.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Does not accord with Wiltshire Core Strategy: Site is not in accordance with Core Policy 44 (Rural Exception Sites).	Individual x1.
Does not accord with Wiltshire Core Strategy: Site is not in accordance with Core Policy 48 (supporting Rural Life).	Individual x1.
Does not accord with Wiltshire Core Strategy: Site is not in accordance with Core Policy 50 (Biodiversity and Geodiversity Protection).	Individual x1.
Site does not meet policy criteria: Site was included due to lack of alternatives put forward but does not meet the planning policy criteria.	Elected member; Individual x1.
Lack of engagement with Parish Council: Overall lack of engagement with Little Somerford Parish Council as a neighbouring authority to this allocation.	Little Somerford Parish Council.
Alternative locations proposed for sites: New gypsy and traveller sites should be located on the edge of larger towns, market towns and large villages with better access to services and facilities, public transport and employment opportunities.	Individual x1.
Sites should be located within existing housing developments: Traveller sites should be allocated within large housing developments in Chippenham as done elsewhere for example in Hampshire and Berkshire.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206, Individual x2.
No evidence that Council-owned land has been considered: There is no demonstrable evidence in the site assessment report of Wiltshire Council owned land/sites/assets and any piece of land being considered and assessed as to its suitability or non-suitability as a Gypsy and Traveller site.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
No evidence that unauthorised existing sites have been considered: There is no indication that existing unauthorised sites have been considered against either Wiltshire Core Strategy Core Policy 47 or the emerging Plan Policy GT3 criteria to assess whether such sites could contribute to the overall pitch requirement.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Inconsistent with Wiltshire Core Strategy Policy: Site location is inconsistent with Wiltshire Core Strategy CP1 and 2 and national planning policy as it is not located at a recognised settlement and in open countryside.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Insufficient site assessment: Site assessment conducted only on a desktop basis with no on the ground surveys.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Inconsistent with national policy: The site allocation contravenes various elements of the National Planning Policy for Traveller Sites.	Lea, Garden and Cleverton Parish Council.
Inconsistent with national policy: Inconsistent with Policy B and C in PPTS, as the scale of the site will represent a dominance of the nearest settled communities.	Individual x1.
Brownfield land would be a preferable approach to site selection: Brownfield and previously developed land is often more readily available around larger settlements and should always be considered first for new gypsy and traveller sites before taking agricultural land out of production.	Individual x1.
Level of mitigation is unsustainable: There are so many mitigation and engineering measures required which are disproportionate to the proposed development rendering site GT27 as financially unviable and undeliverable.	Individuals x4.
Unclear of the Council will monitor each site and required mitigation: Wiltshire Council themselves said they do not have the resources to monitor the implementation of mitigation measures.	Individual x1.
Lack of community engagement: Wiltshire Council have not consulted or engaged with the local community prior to site GT27 being included in the Plan.	Individuals x5; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Community views: Concern over whether the consultation considered the local community's views.	Individual x1.
Inadequate site assessment: Site suitability was not adequately assessed.	Individuals x3.
Previous planning application rejected at site rendering development of site unsuitable: A new residential dwelling near the site was refused planning permission and the same planning reasons used in the decision should apply to the proposed allocation rendering it unsuitable.	Individuals x3.
Existing enforcement notice served on-site: The enforcement notice about the ongoing use of the land without planning permission gives reasons that the land is not suitable for residential use and this should apply to the proposed allocation rendering it unsuitable.	Individuals x2.
Lack of consideration of enforcement notice: Why did Wiltshire Council consider the site when it is subject to an enforcement notice detailing the issues with the site.	Individual x1.
Amount of time in which a plot can be occupied is not specified: The Plan has not specified the number of days the site can be occupied by more than the allowed number of caravans.	Individual x1.
Sustainability Appraisal	

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Scores poorly: The site scores very badly against the objectives of the Sustainability Appraisal.	Individual x1.
Objectives not met: Objective 3 in the Plan is not met because the site scores poorly against Sustainability Appraisal Objectives 10 and 11.	Individual x1.
Sustainability Appraisal Objective 1: The site should be scored moderately adverse with mitigation unlikely to be achievable.	Individuals x5.
Wildlife corridor: The site is pasture land with wildflowers and endangered species including newts. Constitutes a wildlife corridor.	Individual x1.
Unevidenced claims: The assessment makes unevidenced claims, e.g. grassland unlikely to be of high value but does not provide accompanying evidence that this grassland has been independently valued by a suitably qualified land agent.	Individual x1.
Biodiversity: It makes the claim that it is a significant biodiversity asset but contradicts this with the overall assessment of a Minor Adverse Effect. If biodiversity is significant, by association impact will not be less than Moderate and more likely to be increasing to Major.	Individual x1.
No survey evidence: No surveys were undertaken by suitably qualified agents.	Individual x1.
Great Crested Newts: It recognizes the site is home to Great Crested Newts and simply considers compensation (with no accompanying evidence to quantify 'expensive') as a suitable option.	Individual x1.
Sustainability Appraisal Objective 2	
No consideration of alternative brownfield land: Wiltshire Council do not appear to have given adequate consideration to the use of previously developed land, as required by the Sustainability Appraisal Framework, including the potential use of Ministry of Defence sites that have been made available for development.	Individuals x6.
Loss of agricultural land: Even if the land is classified as Grade 3b agricultural, it has a value of £7,500 per acre. With a site of 2.7 Hectares (6.67 acres) this represents a value of at least £50,000 of Good to Moderate viable grassland. Loss of such amenity only reduces organic production capability and increases the reliance on foreign imports. These in turn increase Carbon emissions and contribute, rather than take active steps to combat, Climate Change.	Individual x1.
Lack of evidence: It does not provide an evidenced explanation as to why the loss of 2.7 Hectares of Level 3a/b agricultural land would not be considered and offers no basis of comparison. It states that further analysis is required but makes an assumed conclusion without the basis of this evidence being completed.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Sustainability Appraisal Objective 3	
No sewerage connection: The site lacks access to sewerage system and on site treatment would be required which is an additional risk factor.	Individuals x6.
Geology: The assessment ignores the geology at the site which is not conducive to infiltration of surface water and treatment effluent.	Individual x1.
Mains sewer already at capacity: Foul mains connection has not been properly assessed and sewer at 'The Hill' is already at capacity.	Individual x1.
Sustainability Appraisal Objective 4	
Impacts cannot be mitigated: The impact from noise and light pollution will be adverse and cannot be mitigated.	Individuals x5.
Sustainability Appraisal Objective 5	
Rainwater infiltration: Flood risk and effluent/surface water runoff from the site in view of poor infiltration potential, etc. should be considered and the score changed to major adverse, also in light of flood events.	Individual x6.
Sustainability Appraisal Objectives 8	
Hedgerow removal for safe access: The assessment does not consider the removal of hedgerow for safe access.	Individual x1.
Significant landscape impacts: The open countryside location, proximity of neighbouring properties, the development and screening that would significantly alter the landscape mean that the score is 'major adverse'	Individuals x5.
Sustainability Appraisal Objective 9	
Isolated site: The isolated nature of the site contributes a major (significant) negative effect rather than being a moderate (significant) positive effect which is put forward by the Sustainability Appraisal Appendix B.	Individual x1.
Occupants will remain isolated: The Sustainability Appraisal claims that proximity to Little Somerford facilitates integration but this is insufficient in the absence of a concrete plan so the occupants would potentially be isolated.	Individual x1.
Sustainability Appraisal Objective 10	
Lack of public and pedestrian accessibility: People cannot walk into a settlement without considerable risk due to the lack of pedestrian infrastructure and regular bus services, and are isolated from essential facilities,	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
amenities and services. This is not a neutral effect as proposed by the Sustainability Appraisal Appendix B, this is a major (significant) negative effect.	
Local facilities access: Access to local facilities other than a pub, village hall and church will in practice require private transport.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Poor access to local services: Where access to essential facilities, including health, is assessed as poor, the effect would be Moderate to Major adverse effect.	Individual x1.
Sustainability Appraisal Objective 11	
Scoring should be changed to 'moderate adverse': Position in terms of local amenities, lack of safe pedestrian access, and infrequent local bus services mean that the assessment score should be 'moderate adverse'.	Individuals x7, Lea Garsdon and Cleverton Parish Council.
No access to sustainable transport: The site does not have safe access to sustainable methods of transport and essential services, such as a GP surgery, and is not readily accessible by public transport. This is reinforced by the Highways assessment of the site on page 169 of the Site Selection Report.	Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Road is unsafe for pedestrians: The assessment fails to consider that the access is on a main 50mph road which is unlit, that the site has no pedestrian access to the village, and that essential facilities are only available in major settlements 4km away without regular public transport services.	Individual x1.
Sustainability Appraisal Objective 12	
No employment or education opportunities provided: The site fails entirely to provide education and employment opportunities and it fails Wiltshire Council's own proposed Policy GT3 requiring access to primary school (and doctors/health centre). This allocation cannot have anything other than a major (significant) negative effect on the Gypsy/Traveller community who would be living on this site.	Individuals x2.
Suggested modifications	
Brownfield site: Suggest modification to build the development on a brownfield site.	Individuals x3.
Unsound: The site should be removed as it is unsound.	Individuals x14; Little Somerford Parish Council; Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Location of sites: Gypsy and Traveller sites should be allocated within large housing developments in Chippenham as done elsewhere for example in Hampshire and Berkshire.	Individuals x2.
Communication: Add a policy that respects the settled community requiring clear effective communication.	Individual x4.
Mitigation measures: Add a policy to review the extent of mitigation and engineering measures required, and assessment of development viability	individual x1.
Suitability of the site: Report on the assessment of the site to determine its suitability.	Individual x1.
Require suitable assessment of sites: Appraisal of potential development sites based on sound scientific, engineering and environmental assessments before any site is included in the Plan.	Individual x1.
The Plan is not sound: The site scores badly against the Sustainability Appraisal objectives, Objective 2 of the Plan and the national Planning Policy for Traveller Sites regarding its location. It has no services and is too close to existing residential housing. It should be removed as it is not a sound allocation.	Individual x1.
No connections to transport or key infrastructure: The proposals are on greenfield sites with no public transport links, they are not close to amenities and there is no mains sewage. There is a shortage of medical services in this area and they are out of keeping in this rural area.	Individual x1.
Impact on residential amenity: Development would adversely impact residential amenity by developing a tranquil site which is already disturbed by current unauthorised use.	Individual x1.
Impact on character: Development would harm character of Little Somerford and is inconsistent with Policy GT3 (iii).	Individual x4, Agent on behalf of The Community of Little Somerford, Cleverton and surrounding area x206.
Drainage: The site is on impermeable clay and surface and foul water drainage would not work and pose a risk to the site and the community around it. Development would be inconsistent with Policy GT3 (vi and viii).	Individual x1.
Biodiversity: The policy has been assessed as having a minor adverse impact as mitigation is likely to be difficult to achieve however the assessment makes unevidenced claims.	Individuals x2.
Brownfield sites: Wiltshire Council do not appear to have given adequate consideration to the use of brownfield land as required by the Sustainability Appraisal framework.	Individuals x2.
Agricultural land: Loss of agricultural land increases carbon emissions rather than taking steps to combat climate change.	Individual x1.

Key issues raised (Policy GT27 - Land at Cleverton, Cleverton)	Respondent(s)
Drainage: Development of the site will reduce natural drainage features creating an adverse impact by increasing surface and ground water quantity into the drainage system which is unable to cope.	Individual x1.
Sewerage system: The site lacks access to a mains sewerage system and suitable access can only be achieved across adjacent privately owned property.	Individual x1.
Noise and light pollution: The impact from noise and light pollution will be adverse and cannot be mitigated.	Individual x1.
Flood risk: Any additional drainage to mitigate flooding on the site and any additional impermeable surfaces on the site will increase flood risk in properties downhill from the site in the adjoining village.	Individuals x2.
Landscape: Development of the site would substantially alter the landscape as would any planting or screening.	Individual x1.
Sustainable transport: The position of the site in relation to local amenities, infrequent local bus services and a lack of safe pedestrian access means there will not be access to sustainable modes of transport and it will not minimise the need to travel to essential services.	Individuals x2.
No evidence of how the assessment was conducted: The Sustainability Appraisal only lists the outcome, with no quantifiable supporting evidence as to how the assessment was conducted and what assessment criteria was used.	Individual x1.
No evidence of how the assessment was conducted: The assessment on the length of removal of hedgerows to provide a widened access can only be made by a suitably qualified body. No quantifiable evidence of assessment has been made.	Individual x1.
Rural settlement: Little Somerford has been described as an urban area when it is not an urban area but a rural settlement.	Individual x1.
Community facilities: Little Somerford does not contain community facilities.	Individual x1.

Table 5.39 Policy GT28 - Land at Oxhouse Farm, Rowde key issues

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Highways and Transport (including access)	
Unsafe access: Access and egress to the site close to a blind bend and opposite a junction.	Individuals x41.
Highways safety: Despite the 2.4m setback for the access, the probability of accidents occurring are deemed to be to excessive and there is also a bus stop in the proximity so adding another danger for humans and vehicles.	Individual x1.
Highway safety: Increase in traffic will be too great from 10 units on the site and bring highway safety issues including for pedestrians.	Individuals x5.
Highway safety: Highway safety assessment of the site was undertaken with no local knowledge. Site development would result in hazards for highway users turning right from Conscience Lane having to consider traffic from a new site entrance within 20m in addition to traffic from Rowde and Devizes with partial visibility.	Individual x1.
Visibility splay requirement is unachievable: 43m visibility requirement in the policy is unachievable.	Individuals x2.
Reduced Visibility: Bins outside the site could reduce visibility further.	Individuals x5.
Pedestrian infrastructure: There is no pedestrian infrastructure.	Individuals x25.
Unsafe pedestrian crossing: On-site residents would have to cross the A342 to access the footpath and then again to get into village or the school grounds.	Individuals x3
Site is not within walking distance of facilities: Site is not within walking distance of many facilities and services.	Individual x1.
Query: Where would the new field access be located?	Individual x1.
Increased car usage: No footway will increase car usage and increase in traffic on Devizes Road from 10 pitches.	Individuals x4.
Dangerous road: Vehicles travel at more than 30mph making walking increasingly dangerous.	Individuals x12.
Increased traffic congestion: Development would increase congestion on the A352 into Devizes.	Individual x1.
Buses stopping at site will add to congestion: Buses stopping outside the site would constitute additional issues accessing the site including queues.	Individuals x5.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Road is already dangerous: The A342 is notorious for traffic collisions.	Individuals x4.
Will add hazards to vehicles turning from Conscience Lane: Site development would result in hazards for highway users turning right from Conscience Lane having to consider traffic from a new site entrance within 20m in addition to traffic from Rowde and Devizes, with partial visibility.	Individuals x21; Your Village Your Say.
Traffic will conflict with agricultural traffic: Increase in traffic will conflict with existing agricultural traffic.	Individual x1.
Increase in car traffic: Lack of local facilities will result in more car traffic from this site going through the village.	Individuals x4.
Single access point is fire risk: The single access point is a fire risk, two are needed to allow for change in wind direction.	Individual x1.
Prevents access to further farmland: Position of the site will prevent access to another 13 acres of productive farmland.	Individual x1.
Exacerbating highway flooding: Development would exacerbate highway flooding.	Individual x7.
On-site and highway flooding: On-site flooding and flooding of the adjacent highway.	Individuals x15
Entrance would constantly flood: The entrance to the site would be constantly waterlogged and often underwater during a flood event.	Individual x2; Your Village Your Say.
Utilities and Drainage	
Nearby National Grid project: There is a local National Grid project currently taking place under Roundway Hill, off Conscience Lane, to remove the overhead pylons and put them underground.	Rowde Parish Council; Individuals x6; Your Village Your Say.
Incorrectly identified flood risk area: The flood risk assessment is incorrect because Environment Agency maps show this site to be clearly in the high risk area for groundwater flooding and not just high surface water flood risk.	Individual x2.
Surface run off flood risk: Water run-off from site could flood houses on Devizes Road.	Individual x3.
Land retains water: The land retains water when it rains heavily. The water does not drain away.	Individual x29.
Site partially within Flood Zone 3: Parts of the site in the top left corner are in flood zone 3 based on flood map for planning.	Individual x1.
Field has high probability of flooding: The Rowde/Tanis area has a high probability of flooding.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Drainage stream down Dunkirk Hill can cause significant flooding: Main drainage stream to the west of the site coming down from Dunkirk Hill can cause significant flooding together with on-site springs adjacent to the main A342.	Individuals x15.
Flood risk: The road floods on the bend where the proposed site access is as the field behind floods and overwhelms the drains and this would only get worse with any development on this site.	Individual x1.
Flood risk: The flood risk assessment for Oxhouse Farm is incorrect because Environment Agency maps show this site to be clearly in the high risk area for groundwater flooding and not just highly surface water flood risk.	Individual x1.
Climate change: Flood risk to increase given climate change.	Individual x8.
Flooding: A full water table survey is to be carried out to ensure all measures are carried out to prevent any future flooding in the site.	Individual x1.
Flood risk: Propose a modification that the Plan chooses lower grade land with less flood risk and traffic hazard for example in Devizes.	Individual x1.
Existing sewer capacity issues: There are problems with sewer capacity.	Individuals x12.
Low pressure water mains: There are low pressure water mains.	Individual x1.
Access works will impact drainage: Access works including ditch filling and hedgerow relocation will affect drainage.	Individual x1.
Drainage solution would require substantial investment: Substantial investment would be required into surface water drainage.	Individual x1.
Site Design (including privacy)	
Expansion of school site: The site is located adjacent to a school which may need to expand in the future to accommodate more children.	Individual x1.
Potential expansion: The site could enlarge in the future.	Individuals x5; Your Village Your Say.
Family accommodation: No provision for families and teenagers.	Individual x1.
Large waste bins will be unsightly: Siting of large industrial bins at other traveller sites are quite unsightly.	Individuals x3.
Waste management: There will be a risk of poor waste management impacting on surrounding fields and surrounding neighbourhoods.	Individuals x3.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Settlement gap: The land forms an important buffer between Rowde and Devizes.	Individual x1.
Privacy: The site's proximity to housing would impact on resident's privacy.	Individuals x2.
Permissive path at site: There is a permissive path at the southern boundary of the field.	Individuals x5.
Dog walkers: The land is enjoyed by dog walkers.	Individuals x2.
Landscape	
Brownfield sites would be preferable: Council should have investigated derelict land or re-evaluate past planning permissions for existing sites to meet need, instead of allocating this site.	Individuals x2.
Brownfield land around Devizes should have been considered: Brownfield land around Devizes was not considered in the site selection exercise.	Individuals x2.
Landscape impacts: The site is tranquil, contrary to the assessment which states it is not remote or tranquil.	Individual x1.
Not in-keeping with rural community: The development would not be in keeping with the rural community of Rowde.	Individual x1.
Loss of agricultural land: Land is high grade agricultural land and should not be lost to development.	Individuals x27.
Light pollution: Development will cause light pollution. This would have a detrimental effect, also on the neighbouring national landscape/AONB.	Individuals x16; Your Village Your Say.
Increased noise pollution: Development would result in increase in noise pollution which will affect the other residents of Devizes Road and Tanis.	Individuals x4.
Landscape impacts: Site lies on the edge of the national landscape and would also harm the local landscape and its wider setting.	Individuals x15.
Visibility of site and bund: If a bund is included, this could be visible from MROM56 Oliver's Castle from the North Wessex Downs National Landscape.	Individuals x7.
Screening will be insufficient: Screening will not mitigate visual impact from Roundway Hill which is on elevated ground and overlooks the site.	Individuals x2.
Screening will not immediately succeed: Screening will take time to grow and may not succeed.	Individual x1.
River Quality and Biodiversity	

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Increased river pollution: Increased pollution into the Kennet & Avon Canal.	Individual x1.
Field is often flooded and provides habitats for variety of species: The field is often flooded from October to April most years, this 'winterbourne lake' is the habitat for species of frogs, toads, and newts and it is unclear that the WCC inspection of the site covered this period of the year.	Individuals x5.
Water voles: The brook along the east side hosts water voles.	Individuals x13.
Impacts to existing habitats: This is an area that may impact on other habitats which are protected by the Wildlife and Countryside Act 1981.	Individuals x7.
Bat impact area: The site falls within an impact area for bat species and the development would have a negative impact on bats.	Individuals x4.
Development would disrupt onsite flora and fauna: Site development, including hedgerow removal for access, would disrupt and impact on on-site fauna and flora.	Individuals x9.
Hedgerows: The hedgerows are predominantly of English Elm providing natural habitat and should not be disturbed	Individual x1.
Historic Environment	
Archaeology: The land is of archaeological interest. A full, thorough and accountable investigation for archaeological remains/relics and protected species before work is carried out.	Individuals x2; Your Village Your Say.
Scale	
Too large for identified need: A 10-pitch site is not small and this does not meet what travellers would prefer which is small sites with family owned pitches as per the Regulation 18 consultation report p.54.	Individuals x2.
Impact on local area: Development would dominate the local area on the corner of Devizes Road which consists of eight properties and is distinct from the next housing area.	Individuals x5.
Other	
Insufficient local facilities: There are not enough local amenities.	Individuals x7; Your Village Your Say.
School capacity: The school may not have room for more children.	Individuals x2.
Must be used by genuine Gypsies and Travellers: Sites must be allocated for genuine Gypsies and Travellers only.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Local knowledge not considered: Assessments did not consider local knowledge on issues with the site.	Individual x1.
Site would be unsuitable for residential development: Planning permission would not be granted for residential development here.	Your Village Your Say.
Impacts on the residential amenity: Concerns about site management and impacts on the residential amenity.	Individual x1.
Sub-standard and potentially dangerous site: It does not seem fair to offer a substandard and potentially dangerous site to Gypsies and Travellers.	Individual x1.
Lack of consultation and engagement: Overall lack of engagement with local communities and neighbouring authorities.	Rowde Parish Council.
Unclear how objectives will be met: Lack of clarity regarding how various policy objectives will be achieved.	Individual x1.
Remove site from plan: The site should be removed from the Plan before submission.	Individual x1.
Impact on agricultural land: An accountable guarantee must be made to ensure that the site does not grow in size so diminishing the retention of Greenland and further damage the near-unique agricultural area the proposed site occupies.	Individual x1.
Sequential approach: Propose a modification that the Plan includes a reference to using the sequential approach for flood risk and those with lower risk being developed in preference.	Individual x1.
Suitability of site: The site should be removed as it is unsuitable.	Individuals x3.
Historical considerations: There must be thorough investigations regarding the agricultural and historical benefits before any actions are taken.	Individual x1.
Various issues: Site has multiple issues including flood risk, highways and access, archaeology, no access to services and facilities, and effects on neighbouring residential uses in terms of noise and light pollution. Lack of engagement with local community as part of the planning process.	Your Village Your Say.
Sustainability Appraisal	
Development on Grade 2 agricultural land: Representor submits that the SA at Table 4 recommends to avoiding where possible, development of best and versatile agricultural land. The proposed allocation constitutes Grade 2 arable land.	Individuals x2.
Amend RAG status: Representor suggests correcting site assessment score for access and surface water 'red' rather than 'amber'.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
Site selection process: Representor submits that in the site selection process, sites ruled out at Stage 5 should be reconsidered during the Sequential Test at Stage 6.	Individual x1.
Weighting attributed to Stage 5 (Site selection process): Representor submits that Stage 5 reasons for excluding sites should not carry more weight than flooding.	Individual x1.
Flood risk: The Plan should state that sites at lower risk of flooding should be developed in preference to those at higher risk.	Individual x1.
Site assessment should be red for surface water and site access: The site assessment indicates 'amber' for the vehicle access and for the surface water however, visibility for traffic accessing the site is very poor. Surface water and site access should be marked as 'red' rather than 'amber' in the assessments.	Individual x1.
Brownfield sites: Aim to maximise brownfield sites and not to use greenfield sites that are in agricultural use. This site is a greenfield site and is currently in agricultural use with a tenant farmer and would result in the loss of Grade 1 land.	Rowde Parish Council.
Flood risk: The A342 at the entrance to the proposed site, floods regularly when there is heavy rain. Rowde Primary School has been permitted to fill a ditch that ran along the back of the property (adjacent to the proposed traveller site) potentially causing local flooding problems.	Rowde Parish Council.
Flood risk: Policy is not sound as it is a flood risk, by nature of the proliferation of underground springs in the immediate vicinity and runoff from the field entrance, together with surface water running down the A342 from the direction of Dunkirk Hill (Flood Zone 1: risk of surface water flooding).	Individual x1.
Ditches are overgrown: Ditches are overgrown and Wiltshire Council does not enforce landowners to clear their ditches. This compounds problems with flooding. The ditch on the road to the proposed opening is higher than the road and work that was agreed to take place to dig out the ditch has never taken place.	Rowde Parish Council.
Geophysical survey has not taken place: No geophysical survey has been carried out.	Rowde Parish Council.
The removal of hedgerows will take many years before it provides visual mitigation: The proposed site has shared intervisibility with the North Wessex Down Natural Land. This is an Area of Outstanding Natural Beauty. The policy states that it may be necessary to move hedgerows for visibility, new planting will take many years before it provides visual mitigation which does not help with integration of the site the effect it will have on the dominant community.	Rowde Parish Council.
Natural habitat: The historic hedgerows enclosing the proposed site are predominantly of English Elm, which provides a natural habitat for wildlife around the village.	Individual x1.

Key issues raised (Policy GT28 - Land at Oxhouse Farm, Rowde)	Respondent(s)
<p>No health or community services: Rowde has no health or community services. 'The site is selected to minimise need to travel to essential services' however there are no essential services in Rowde.</p>	Rowde Parish Council.
<p>Insufficient evaluation: Insufficient evaluation of this site has been conducted particularly in consideration of the overall land quality and irretrievable loss of agricultural land, consideration of the flooding risk to the intended residents, consideration of the safety of the intended residents, consideration of the local wildlife and the impact to highways in a potentially dangerous area.</p>	Rowde Parish Council.
<p>Watercourse: The watercourse provides drainage from the Grade 2 agricultural land below the Bath Road Escarpment and contains both diverse and rare aquatic life.</p>	Individual x1.

Table 5.40 Policy GT29 - Land at Upper Seagry Farm, Upper Seagry key issues

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Highways and Transport (including access)	
Public Services, Infrastructure and Employment: Access to education, health, welfare and employment is reliant on private car ownership as the villages public bus service runs infrequently (twice a day) and Upper Seagry has limited/no infrastructure/services in the village. Residents will need to travel to Chippenham or Malmesbury to access services. This is against the Sustainability Appraisal objective of reducing the need to travel and it will isolate the occupants of the site.	Individuals x86; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
Traffic Congestion: Due to the lack of public transport and site location, occupants will require a car which will increase traffic in the village. Upper Seagry is already struggling with flooding, poor road conditions and road traffic.	Individuals x21, Cisco Systems.
Pedestrianisation: Access to local bus stop and village requires walking along the road which has no footpath, no street lighting, is on a bend in the road and at national speed limit, thus increasing the risk of accidents. Suggest policy changes to provision street lighting, footpath and removing a substantial length of hedgerow. Others have said it is impossible to create a satisfactory footpath.	Individuals x49; Trustees of Goss Croft Hall; Cisco Systems x2; FM Conway Ltd x2; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
Main Road Access: Immediate access to main roads would be preferable.	Individual x1.
Existing Road Use: Narrow lanes to and from site are used for heavy and large agricultural vehicles.	Individuals x10; Cisco Systems.
Visibility Splay: Limited sight line from the entrance on a national speed limit road, despite the proposed removal of hedgerow. This increases the risk of accidents.	Individuals x35; Trustees of Goss Croft Hall; FM Conway Ltd; Great Somerford Parish Council; Seagry Steering Group; Cisco Systems.
Visibility Splay Legislation: Highways England 'Design Manual for Roads and Bridges' requires a 215m visibility splay. From the south a 90m visibility splay is unsafe given the 60mph speed limit. Representors suggest a 215m policy compliant visibility splay should apply.	Seagry Steering Group; Cisco Systems.
Agricultural Vehicles: Site is close proximity to large agricultural vehicles which poses a safety risk.	Individuals x2; FM Conway Ltd.
Visibility: The representor states there is less than 100m visibility based on the Design Manual for Roads and Bridges guidance. Wiltshire Council does not own or maintain the hedgerow to the north along the road so the	SLR Consulting on behalf of Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
councils claim that appropriate visibility can be achieved is misguided. There are safety issues with regards to speed checks along the road. Achieving the desired visibility splay has safety implications in this regard. A large section of the hedging would need to be removed to ensure safe access to the road.	
Vehicular access: Access to site GT29 would be difficult and potentially dangerous.	Individual x1.
Pedestrian safety: To gain access to health and community services and facilities or shops occupiers will need to travel to Chippenham, Malmesbury, Great Somerford, Sutton Benger and Christian Malford. None of these locations are accessible by footpath or a lit road so represent a hazard if accessing by foot.	Individuals x15; FM Conway x3.
Access to public transport: The site has poor public transport accessibility with a very limited service in Upper Seagry.	Individuals x11; FM Conway x3.
Accessibility: To enable the required access and to accommodate visibility splays significant removal of the hedgerow would be inevitable making the site extremely visible.	Individuals x14; FM Conway x3.
Utilities and Drainage	
Sewer Connection: A foul sewer connection is likely to be disproportionately costly and disruptive given the distance the site is away from the main sewer. If Biotreatment is the only viable option, run-off will contaminate ponds and environments.	Individuals x22; Trustees of Goss Croft Hall; Cisco Systems x2; Great Somerford Parish Council.
Requirement for Sewer Connection: Paragraph 4.1.35 is uncertain if a foul sewer connection is required. Representor asks on what grounds would it not be required?	Individual x1.
Electricity and Water Connection: Electricity and water mains are not on site, so it would be a significant cost to install this infrastructure.	Individuals x4; Great Somerford Parish Council.
Renewable Energy: Site is unlikely to have a positive effect regarding the generation of energy from renewable sources as there would be insufficient supply for cooking.	Individuals x3; Seagry Steering Group; Cisco Systems.
Waste Management: Insufficient and ineffective waste management facilities.	Individual x1.
Sewage Back-up: Sewage must have emergency overflows to cover for breakdown or power failure. These can only be routed to the above waterway.	Individual x1.
Drainage: GT29 sits on heavy clay. Concerns raised over drainage and how this will be remedied.	Individual x1.
Low-carbon energy: All should be using low-carbon energy generation to meet net-zero standards. In relation to GT29 this would be a costly exercise and not good use of tax payers money.	Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Flood risk: Runoff/ Road Flooding is already an issue in Upper Seagry, particularly near to this field access and Upper Seagry Farm entrances.	Individuals x3; FM Conway.
Drainage: There is a lack of mains drainage that would result in pollution of 3 ancient field ponds situated on the natural topographical drainage course along the northern site perimeter.	Individuals x3.
Sewerage treatment: Sewerage treatment by onsite plant or by pumping offsite must have emergency overflows to cover for breakdown. These can only be routed to the waterway. Surface runoff must be similarly routed.	Individuals x5.
Sewerage Run-Off: Sewerage provision will cause polluted run off into the local environment and worsen biodiversity quality.	Individual x1.
Soil Infiltration: Pitches will compact the soil reducing its ability to adsorb water, resulting in increased runoff, erosion, loss of fertile topsoil. This will impact drainage patterns.	Individuals x5.
Flood Risk: The Plan acknowledges 'there is evidence of high groundwater', and there is a lack of drainage infrastructure which has caused flooding in the village and near the site.	Individuals x34; Trustees of Goss Croft Hall; Seagry House Estate; FM Conway Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group; Cisco Systems.
Drainage: The underpinning evidence in the Site Selection Report states that the site should be developed for no more than five pitches.	Individual x1.
Site Design (including privacy)	
Proximity to Seagry Village Hall: Site is adjacent to the well-used Seagry Village Hall. Any hedge planted would take years to mature to provide privacy. The site will have a detrimental impact on village hall bookings which is used for events.	Individuals x31; Great Somerford Parish Council; Seagry Steering Group.
Impact on village hall: Concerns over potential impact of development on adjacent village hall.	Individual x1.
Landscape	
Hedgerow: Much of the hedgerow at GT29 would be lost.	Individual x1.
Hedgerows: The installation of the infrastructure required to support a new community together with the removal of existing hedgerows will drastically diminish the rural character of the village.	FM Conway.
Views: Site GT29 is adjacent to the village hall and affect views from the hall resulting in reduced bookings.	Individual x1.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
River Quality and Biodiversity	
Biodiverse Species: There is potential presence of great crested newts and there are several other species of biodiversity not given any mention in the proposal. Species use the pond as a water source so would be prevented access by development of this site. There are insects, birds, deer and bats which will be impacted by the site placement.	Individuals x32; Trustees of Goss Croft Hall; Seagry House Estate; FM Conway Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group; Cisco Systems.
Renewable Energy: Renewable energy would conflict with biodiversity on the site.	Individuals x2.
Hedging: Important wildlife hedging will be lost to meet traffic viability requirements which will effect biodiversity.	Individuals x 29; FM Conway Ltd; Great Somerford Parish Council; Seagry Parish Council; Cisco Systems.
Biodiverse Plants: The construction of pitches will reduce plant biodiversity which impacts food chains and ecosystems.	Individuals x5.
Oak Tree: Oak Tree subject to a Tree Preservation Order which will be affected by the site.	Individuals x5; Seagry Steering Group.
Pond Pollutants: Pollutants will impact three ancient field ponds on the northern site perimeter.	Individuals x3; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; Great Somerford Parish Council.
Habitat Buffers: The site may need to be increased in size to accommodate the 10m buffer to existing habitats.	Individual x1.
Grassland Quality: Grassland is assumed to be in moderate condition when on inspection it is in excellent condition.	Great Somerford Parish Council.
Bat Disturbance: It is a crime to disturb bats in their habitats. Wiltshire Council has failed to assess bat populations and will be criminally liable.	Individual x1.
Environmental Surveys: The council have not performed any environmental/ecological surveys for the development plan, and there is no mention of required mitigations and the costs of these mitigations.	Individuals x8; Seagry Steering Group.
Neutral Environmental Impact: The statement that the site is of neural impact is inconsistent with the plan. Adverse effects will arise from the removal of hedgerows, vehicular pollution (due to increased private car ownership), noise and light pollution.	Individual x24; Great Somerford Parish Council; Seagry Parish Council; Seagry Steering Group.
Landscape Damage: Development would be perceived as an alien feature in the natural landscape, requiring significant removal of hedgerow.	Individual x63; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; FM

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
	Conway Ltd x3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group.
Lack of assessments on biodiversity in the area: Treater Crested Newts may be present and the hedgerows provided a prime location for bats. Hedges such as those present adjacent to the site are ideal for bats as they are more valuable commuting routes and as a foraging habitat with lots of insects.	Duckworths Arboriculture Ltd on behalf of Individual x1.
Protected wildlife: The presence of protected wildlife such as great crested newts and bats would require protection of their environment.	Individuals x6; FM Conway.
Habitat creation: Habitat creation has not been explored or protected and species have not been identified to strive to enhance the fauna and flora of this established village.	Individuals x2.
Historic Environment	
Development on Agricultural and Historical Land: Disapproval for development on Grade 2 agricultural land with historical and cultural value (presence of a medieval ridge). Brownfield sites should be prioritised. Development could cause irreversible damage.	Individual x78; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x3; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group; Verschoyle Graphic Design.
Historic environment: There is clear evidence that the proposed site and the land around it have historic medieval ridge and furrow.	Individuals x15; FM Conway x2.
Other	
Agricultural land: Proposed site is on grade 2 very good agricultural land that has never been developed and is still being currently farmed.	Individuals x16; FM Conway x3.
Impact on farming: The site is on Grade 2 agricultural land and development impact the operation of the current farming use cattle. The tenant was not informed by Wiltshire Council. The existing access is needed by the farmer and a new access will be required for the development.	Individual x1.
Sense of Community: The site is a distance from the village so there would be no sense of being part of the village community.	Individuals x5; Verschoyle Graphic Design.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Dairy Farm Odour: Upper Seagry Farm has a Dairy herd that generates odours and attracts flies.	Individuals x4; Seagry Steering Group; Cisco Systems.
Farming: The site removes income from the farmer who currently uses the land for cattle (part of an SFI scheme for 3 years). The tenant was not informed by Wiltshire Council and was only told by the Parish Council.	Individuals x16; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Steering Group.
Core Policy 2 in the Neighbourhood Plan: Conflicts with Wiltshire Council's own policy SN6 Core Policy 2 in the Neighbourhood Plan that small village development will be limited to infill within the built area. Upper Seagry is defined as a small village so the development therefore breaches this policy.	Individuals x17, LPC Ltd on behalf of individual x1, Seagry Parish Council, Seagry Steering Group, Cisco Systems.
Government's 'Planning Policy for Traveller Sites' paragraph 26: Policy states that 'local planning authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements'. Site is within walking distance of Upper Seagry which is a small village. Previously developments have been rejected due to the unsuitable location of Upper Seagry.	Individuals x29, Seagry House Estate, Cisco Systems x2, Great Somerford Parish Council, Seagry Parish Council, Seagry Steering Group.
Objective 3 of the Plan: Unsuitability of site against Objective 3 'the site should be fitting with the surroundings, located in a suitable location, access to services and facilities'.	Individuals x20; Cisco Systems x2; Great Somerford Parish Council; LPC Ltd on behalf of Individual x1; Seagry Parish Council; Seagry Steering Group.
Sites elsewhere: There are many other Gypsy and Traveller sites nearby that have capacity. For instance, Seagry Hill has an unused traveller site and travellers have recently purchased land adjacent to the A350 leaving Chippenham toward the M4. Other sites owned by the council include Fairhaven, Thingley and Lode Hill.	Individuals x9, Seagry Parish Council, Cisco Systems.
Consultation process: Not notified of this site by Wiltshire Council.	Individuals x5.
Affordability: Representor has to travel to work due to a lack of affordable housing in the area.	Individual x 2.
Cost: Concerns over availability of resources to deliver this site.	Individual x1.
Land ownership: The Plan refers to a hedge on the northern boundary, that implies it is within the site when it is of ownership to OS field numbers 6923 and 8627.	Great Somerford Parish Council.
Site requirement: Residual requirement for new pitches is 68 not 81 due to new planning permissions.	Individuals x4; Seagry Parish Council; Seagry Steering Group; Cisco Systems.
Extending sites elsewhere: Extend already established Gypsy and Traveller sites.	Individuals x8; Great Somerford Parish Council; Seagry Parish Council.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
Policy wording: Inconsistencies in policy wording. Policies GT30, GT26 and GT24 all state 'no more than x gypsy traveller pitches' whereas GT29 states the site 'is allocated for the development of 5 gypsy and traveller pitches'. Limitation of 'no more than' should be added to policy wording.	Individual x2.
GT29 General location: Is in a rural location away from settlements and services and does not meet national guidance in that regard.	Individual x1.
Employment: The site has poor access to employment. Employment should be within 6km but Chippenham is 8.5km away.	Individual x1.
Agricultural land classification: Wiltshire Council have incorrectly classified the land as partly Grade 2 and partly Grade 3. The land is entirely Grade 2.	Individual x1.
Remove site GT29: Remove this site as a site allocation.	Individual x1.
Agricultural Land: Site GT29 is on Grade 2 agricultural land and should be used as such.	Individual x1.
Access to schools and employment opportunities: The site has extremely poor access to schools and employment opportunities and there are no local businesses with job opportunities within walking distance or that can reasonably be accessed via public transport. The nearest secondary schools are also in Chippenham.	Individuals x9; FM Conway x2.
Low-carbon energy standards: All new sites should be using low - carbon energy generation and air source heat pumps as it is a planning requirement for all developments to meet net - zero standards. This should be considered a baseline.	Individual x1.
Sustainability Appraisal	
Objective 3: Objective 3 states that sites should be designed to fit in with their surroundings, be located in sustainable areas and provide access to services and facilities that meet the needs of both the settled and traveller communities. However, there is no clear documentation available that assesses this site's suitability against these criteria.	Individuals x2.
Sustainability Appraisal scoring: Scoring against the Sustainability Appraisal is too weak. Site represents a major adverse effect.	Individuals x 60; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems; FM Conway Ltd x 3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group.

Key issues raised (Policy GT29 - Land at Upper Seagry Farm, Upper Seagry)	Respondent(s)
<p>Removal of Policy GT29: Sustainability Appraisal is incorrect. Site should be removed as an allocation.</p>	<p>Individuals x73; Trustees of Goss Croft Hall; Seagry House Estate; Cisco Systems x2; FM Conway Ltd x 3; MGI Engineering Ltd; Great Somerford Parish Council; LPC Ltd on behalf of individual x1; Seagry Parish Council; Seagry Steering Group.</p>

Table 5.41 Policy GT30 - Land at Whistley Road, Potterne key issues

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Highways and Transport (including Access)	
Reliance on private car use: Future residents would rely on the car to access services and facilities as there is no dedicated space for safe walking or cycling, and no street lighting.	Individuals x38; Petition x487.
Infrequent local bus services: The local bus service is infrequent and stops early.	Petition x487.
Difficulty for construction vehicles to access site: During the site development the road would have to be closed and large vehicles have to gain access along what is already a very compromised lane.	Individual x1.
Weight limit on road ignored by drivers: The 7.5 ton limit is ignored by lorries and coaches.	Individuals x3.
Encourages 7.5 ton vehicles: The development would cause and encourage use of vehicles in excess of 7.5 tonnes.	Petition x487.
Speeding along existing road: Vehicles drive at more than 30mph making it dangerous for other road users.	Individuals x11.
Blind turn at Church Corner: At Church Corner, Potterne, there is a blind right hand turn, in a single file road passing the old school with risk of accidents.	Individuals x4.
Narrow single-lane highway: Whistley Road is a narrow single-lane highway and cars use driveways to pass each other.	Individuals x36; Petition x487.
Lack of Traffic Survey: A traffic survey would have assisted the Council understanding the issues and it appears the site was not visited as part of the assessment.	Individual x1.
Roadside properties damaged by traffic: Roadside property has been damaged by road traffic due to narrowness of the highway.	Individuals x2.
Existing heavy traffic and congestion: Whistley Road is suffering from heavy traffic and congestion.	Individuals x35; Petition x487.
Coaches: Coaches are using this road also.	Individuals x7.
History of serious road accidents along road: There have been serious accidents on this road.	Individuals x14; Petition x487.
Potential for road accidents: Potential risk of there being a road accident.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Section of Whistley Road is unsuitable for large vehicles and trailers: The section of Whistley Road between Five Lanes and the A360 is unsuitable for larger vehicles and large trailers, with recent evidence of blockages caused by unsuitable vehicles using this route, including larger touring caravans.	Individuals x6.
Narrow track road with limited visibility: Access to the site is on a narrow single track section with limited visibility either way and risk of collision with other road users.	Individuals x16.
Large area needed for vehicles turning into site: To enable safe access a large area would have to be designated for turning but vehicles would end up reversing onto the lane.	Individuals x2.
Road blocks: Emergency or refuse collection vehicles would block the road.	Individuals x5.
Dangerous blind bend close to site access: Access onto Whistley Road from the A360 is dangerous as it is on a blind bend.	Individuals x5; Potterne Residents (group).
Narrow width of turning area off dual carriageway: There is a very narrow width of the turning area off the A361 dual carriageway at Caen Hill.	Individuals x2.
Previous reinforcements to road: The road has been reinforced twice to prevent collapse.	Individuals x2.
Rat-run: Whistley Road is a rat run for people travelling from Chippenham to Salisbury.	Individuals x10.
Pedestrian amenities: There is no street lighting and no footpath.	Individual x1.
Transport and traffic impacts not adequately assessed: Assessment of this site in the Plan does not adequately assess transport and traffic impacts.	Individuals x2.
Relocation of site footpath: There is a footpath within the proposed site boundary which would require relocating. To get to the footpath on the other side of the road would then be extremely dangerous.	Individuals x3.
Footpath safety concerns: Concerns over safety on footpath.	Individuals x3.
Modify Whistley Road to make one way system: Propose modifications to a) make Whistley Road one-way for its entire length plus walkway and street lighting or b) two-lane plus walkway and street lighting from the site to A361 Caen Hill and one-way plus walkway and street lighting from the site to A360 Potterne.	Individual x1.
Wall removal: The removal of the wall will result in further scope for traffic to erode the road edges and result in highway safety issues.	Individual x1.
Narrow road: The road is too narrow.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Limited access to facilities and services: Access is limited to nearby facilities and services.	Individuals x2.
No streetlighting or footpaths: There is no street lighting or footpaths on the road resulting in reliance on the private car and increasing traffic on unsafe road.	Individuals x2.
Traffic: Existing traffic issues at the site. This presents safety risks for walkers as there are no pavements.	Individuals x4.
Site is not easily accessible: The site is not easily accessible from Potterne.	Individual x1.
Access road is unsuitable: Whistley Road is single track. It is not a suitable site for accommodation of any type. Whistley Road is prone to flooding. The site is several miles from the nearest school or GP and would not be possible to access without private vehicles.	Individual x1.
Reliance on private car: Future residents would rely on the car to access services and facilities as there is no dedicated space for safe walking or cycling.	Individual x1.
Highway safety: Whistley Road is a narrow single-lane highway and cars use driveways to pass each other.	Individual x1.
Traffic: Whistley Road is suffering from heavy traffic and congestion.	Individual x1.
Accidents: There have been serious accidents on this road.	Individual x1.
Utilities and Drainage	
Exacerbating flood risk: The fields on and around the site are prone to flooding which also affects the road. This would be made worse by developing the land.	Individuals x25; Petition x487.
Poor existing site drainage: The ground on the site is badly drained, torrential rain causes rapid flow of water across the site and flooding down the road.	Individuals x2.
Geohazard: Council's own evidence states that there is significant potential for geohazard. Ground instability problems are probably present. Increased infiltration may result in ground instability. This would be exacerbated by development.	Individuals x4.
Surface water run-off increase: Development would increase water run off towards properties and the frequency and severity of flooding.	Individuals x2; Petition x487.
Drainage from sites contributes to flooding: On site drainage was never improved and contributes to flooding issues in the locality.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
New hardstanding will increase flood risk: Site access and development would require hard driveways increasing water run-off and widespread flooding.	Individuals x4.
Wiltshire Council may be liable to increasing flood risk: Such events may give rise to a liability to Wiltshire Council for causing this foreseeable increased risk of flooding (Bybrook Barn Garden Centre and Others v Kent County Council CA 1 December 2001).	Individuals x2.
Utilities: Putting utilities into the site would be costly and could be done more cheaply at a site elsewhere.	Individual x1.
Utilities should be provided to all sites, there is an existing fault line parallel to Whistley Rd: Sites should be provided with access to mains water, electricity supply, drainage and sanitation in accordance with regulations. There is a fault line which runs parallel to Whistley Road which is one of the reasons land on the East side of the road has not been developed because there is a problem with water/springs on this line. Proposed site must be relatively flat and site should not be developed on exposed sloping because of the risk of flooding or over-turning of caravans.	Individuals x4.
Odour Consultation Zone: The proposed allocation 'Policy GT30 Land at Whistley Road' is within the Odour Consultation Zone of our existing Potterne Wastewater Recycling Centre. Our Preliminary Odour Risk Assessment indicates that there is a Slight Adverse to Medium Adverse Effect. We recommend that the developer undertakes a library value emission rate odour model to predict the likelihood of future residents experiencing poor amenity. This should be backed up with a sniff testing assessment as the proposed allocation will result in a new sensitive receptor being placed in closer proximity to the Wastewater Recycling Centre than existing sensitive receptors.	Wessex Water.
Further sewage pipes will increase flooding: The area floods and adding further sewage pipes would risk further flooding.	Individuals x2.
Fault line: There is a fault line parallel to Whistley Road which one of the reasons land on the east side of the road has not been developed because there is a problem with water/springs on this line. Proposed site must be relatively flat and site should not be developed on exposed sloping sites because of the risk of flooding or over-turning of caravans.	Individual x1.
Waterlogged site: The land becomes very waterlogged and a risk to caravans stationed there.	Individuals x2.
Flooding: Existing flooding concerns at the site.	Individuals x3.
Flood risk: The field near the site is prone to flooding which also affects the road. This would be made worse by developing the land.	Individual x1.
Site Design (including Privacy)	

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Consultation potentially required: Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement. Development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation, including the potential for an environment attractive to hazardous bird species to be formed temporarily.	Individual x1.
Site is more suitable for single dwelling: Site is far more suitable for a single dwelling than two Gypsy and Traveller pitches given the Government's drive for more housing and the pressure to build more housing in the village.	Individual x1.
Site unsuitable for single dwelling: The site was deemed unsuitable for the development of a single dwelling by both Wiltshire Council and the Planning Inspectorate and site conditions have remained the same since this decision.	Individuals x8.
Hedgerow removal: Development would require removal of significant section of hedgerow.	Individuals x9.
Historic hedgerow: Hedgerow is protected and at least 200 years old based on historic maps, so it cannot simply be replanted on a new alignment.	Individuals x3.
Hedgerow removal: Development would require removal of 80 year old hedge.	Individual x1.
Site cannot be effectively screened: Site cannot be effectively screened for many years through new planting, as it is raised and the existing hedgerow and wall would have to be removed for access.	Individuals x2.
Difficult to mitigate residential amenity impacts: The land overlooks the road and neighbouring properties which makes it difficult to mitigate impacts on residential amenity.	Individuals x2.
Impacts will increase parallel to site increase: Site will grow with time with corresponding increase of impacts on the landscape, traffic, noise, light pollution.	Individuals x2.
Unacceptable impacts to residential amenity: Site development with pitches including dayrooms would be bigger than the refused single dwelling, dominate the nearest settled community and unacceptably impact on the amenity of neighbouring properties.	Individual x1.
Site doesn't comply with design requirements: The site does not comply with design requirements for gypsy and traveller sites as per 2008 Designing Gypsy & Travellers Sites – A Good Practice Guide.	Individual x1.
Does not meet Good Practice Design Guide principles: Site does not meet design requirements in Designing Gypsy and Traveller Sites - A Good Practice Guide.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Fire and Rescue officer need to be consulted with: Not clear if the fire and rescue officer was consulted in relation to the design and access requirements in accordance with 'Designing Gypsy and Traveller Sites - A Good Practice Guide'.	Individual x1.
Further separation needed between site and houses: Further separation is needed between good sites for travellers and established dwellings close to a conservation area.	Individual x1.
Landscape	
Density of site allocations within local area: Potterne and Rowde are within 5 miles of each other and are being targeted for just under 10% of new gypsy/ travellers sites in the whole of Wiltshire.	Individual x1
Too close to village: Concerns over proximity of development on the character of the village.	Individual x1.
Site is of rural character: The site is evidently rural in character and affinity with the surrounding countryside so the development would be inappropriate as per appeal decision.	Petition x487.
Salisbury Plain SPA Buffer Zone: The site is within 6.4km buffer of Salisbury Plain SPA and a greenfield site - question if impacts can be mitigated.	Petition x487.
Monitoring light pollution: Light pollution from the development cannot be policed.	Individuals x3.
Unacceptable landscape harm: Development would result in unacceptable harm to the landscape character of Whistley Road and the setting of the village, through the introduction of built form, caravans, and other paraphernalia; and to the character and appearance of the area as per the appeal decision at this site.	Individuals x16, Petition x487.
Cumulative irreversible impacts: In conjunction with other ongoing proposals including two major solar farms, the village would be overdeveloped and irrevocably changed.	Individual x1.
Disruption to village character: Potterne is a small village and influx of travellers would disrupt the character of the village, alienating many older residents in Potterne.	Individual x1.
Contrary to Wiltshire Core Strategy: The site is contrary to Policies 51 and 57 of the Wiltshire Core Strategy which requires development to protect, conserve and enhance landscape character and the landscape setting of settlements, and to enhance local distinctiveness by responding to the value of the natural environment, relating positively to its landscape setting.	Individuals x3.
Loss of farm: The loss of farm land cannot be compensated.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Unclear how agricultural use can continue: If the site is developed it is unclear how farming could continue as the development would occupy the agricultural access.	Individuals x3.
High Agricultural Value: The land is of high agricultural value with fertile soil and should not be developed for this reason.	Individual x1; Petition x487.
River Quality and Biodiversity Quality	
Damaging impacts: The effects this site would have on important wildlife is both irresponsible and damaging.	Individuals x9.
Land is of ecological importance: The land is of ecological importance in the rural setting, with an ancient and well-established hedge and old wall along the full boundary length of the road.	Individual x1.
Historic Environment	
Archaeological potential of site has been dismissed without investigation: The potential for archaeological finds has been dismissed without investigation despite previous discoveries in the area.	Individual x1.
Increase in traffic would contravene the Conservation Area: Increase in traffic from the site will be in contravention of the Potterne Conservation Area Statement 2002 which identifies traffic as a key issue. It states that efforts will need to be made to protect the special character of the village to ensure its long term survival for the benefit of existing and future residents, businesses and visitors.	Individual x1.
Impacts to local character from removing wall: To maintain required visibility the wall may have to be demolished which currently adds to the local character of the village.	Individuals x4.
Other	
Consultation period was too short: Representor submits that the consultation period is too short and should have adhered to Government advice in the Gunning principles. i.e. 12 weeks.	Individuals x3.
Objection: General objection to the allocation - petition.	Individuals x22; Petition x497.
Contrary to Objective 3 of Plan: Allocation is contradictory to Objective 3 of the Plan.	Individuals x2.
Does not meet Plan Objective 3 nor national planning policy requirements: Site does not meet plan Objective 3 nor national planning policy requirements as it is neither in the right location, on a treacherous and over stretched road, nor is it a sustainable site.	Individual x1.
Impact of development: Concerns over impact of development in Potterne.	Individual x1.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
<p>Procedural impropriety: The Plan also appears to meet the threshold of procedural impropriety in the numerous examples detailed above where Wiltshire Council has failed to adhere to the National Guidance, stated incorrect assessments based on flawed evidence and failed to submit evidence to support its subjective decisions. In conclusion, the Plan is not legally compliant and fails to meet the test of Soundness - it is not justified, effective, nor consistent with national policy.</p>	Individuals x3.
<p>References to appeal decision: In view of the appeal decision, the decision to propose this new site (Policy GT30) appears to meet the threshold of irrationality in a number of areas stated above, as per the Wednesbury Principles of Unreasonableness [Associated Provincial Picture Houses Ltd v Wednesbury Corporation (1948)].</p>	Individuals x2.
<p>Contrary to the Core Strategy: The site is contrary to Core Policy 47 of the Wiltshire Core Strategy, which states that state new pitches will only be granted where there is no conflict with other planning policies and where no barrier to development exists.</p>	Individual x1.
<p>Already suitable accommodation elsewhere: Suitable accommodation for these two proposed new pitches already exists on a Wiltshire Council owned site, therefore making Policy GT30 as a proposed new permanent site redundant (Wiltshire Council Strategic Planning Committee Meeting, 10th July 2024 refers).</p>	Individuals x2.
<p>Contrary to appeal decision (refusal of Bungalow): The site would include the potential for six cars, two touring caravans plus two towing vehicles and touring caravans, which is above what was deemed unacceptable by the appeal decision regarding one bungalow.</p>	Individuals x3; Potterne Residents (group).
<p>Not compliant with Local Plan: Site is not compliant with the local plan as the area is not defined for development.</p>	Individual x1.
<p>Further development in the future: It would open up many other opportunities for development.</p>	Individual x1.
<p>Development will lead to new undesirable housing development: Development at this site would pave the way for undesirable future housing development on fields around Potterne.</p>	Individuals x2.
<p>Village does not meet Plan criteria: Potterne is a small village that does not meet the criteria set out in the Plan.</p>	Individual x1.
<p>Outside settlement limits: The site is located outside the settlement boundary and an appeal against refusal of planning permission for a single dwelling was dismissed.</p>	Individuals x49; Petition x487.
<p>Lack of facilities and amenities in village: There are not enough essential facilities and amenities in the village.</p>	Individuals x30; Petition x487.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Medical facilities are over 3 miles away from village: Local services such as doctor's surgery and chemists are over 3 miles away from the village and site.	Individuals x9; Petition x487.
Lack of key facilities: Lack of amenities, no doctor's surgery, no school and only a small shop. The bus service is light and would require complete reliance on cars, ease of access to such facilities from this site is unsuitable.	Individual x1.
Noise pollution: Noise pollution is a concern for residents, given the open nature of the fields.	Individuals x6.
Visible light pollution: Light pollution would also be visible from other properties in Whistley Road, together with properties as far away as Brownleaze Lane and Tollbar Close, which overlook the valley and Whistley Road.	Individuals x2.
Irreversible impacts to residents: The effects this site would have on residents is both irresponsible and damaging.	Individuals x3.
Several impacted properties: A larger number of properties (48) than stated in the evidence (25) would be affected by the site including Toll Bar Lane.	Individuals x2.
Contrary to Wiltshire Core Strategy: Allocation is contrary to Core Policy 47(v) of the Wiltshire Core Strategy, and national Planning Policy for Traveller Sites paragraphs 4(k) and 13 in terms of accessibility of services, employment and facilities.	Petition x487.
Contrary to Potterne Neighbourhood Plan: Development would be contrary to the 2017 Potterne Neighbourhood Plan and permitting it would ignore the plan.	Individual x17.
Site was previously excluded as housing allocation: The site was ruled out for housing allocation as part of the work on the Potterne Neighbourhood Plan.	Petition x487.
Parts of site will be isolated: Other parts of the land have been shut off resulting in complete isolation of the 'top field'.	Individual x1.
Remove site: The site should be removed from the Plan by way of a modification.	Individuals x6; Petition x487.
Neighbourhood Plan: Proposes modification to require the Potterne Neighbourhood Plan to assess if it is acceptable to extend the settlement boundary to include proposed site GT30.	Individual x1.
Location of site: The location of sites should be aligned with local village plans.	Individual x1.
Soundness: Site should be removed before submission to meet the soundness criteria.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Previous Planning Applications rejected at the site: The site has already been deemed unacceptable for 1 single dwelling by both Wiltshire Council and the Planning Inspectorate. Traffic and Flooding are already issues at this Site. Loss of hedgerow is not an eco-friendly approach.	Individuals x4.
Location: The site is located away from essential facilities such as schools, employment or doctors' surgeries.	Individuals x2.
Suitability of site: Sites included in the Plan, must be suitable, fit for purpose, take into consideration and provide for the criteria set out in the Pre-submission draft plan (Regulation 19) when assigning sites. This justification has not been included for all sites, namely Policy GT30 as there was no other property to consider.	Individual x1.
Appeal decision: The site is located outside the village boundary and an appeal against refusal of planning permission for a single dwelling was dismissed.	Individual x1.
Sustainability Appraisal	
Site should be left in natural state for biodiversity purposes: In response to Sustainability Appraisal Objective 1, the site should be left in natural state to maintain biodiversity which can exist in combination with farming. Proposed development would encroach on endangered and protected species such as badgers, grass snakes, slow worms and bats.	Individuals x2.
Land should be preserved for food production: In response to Sustainability Appraisal Objective 2 that in view of food shortages the land should be preserved for food production as it is decent agricultural land. Development would have more than minor adverse effect.	Individuals x2.
No existing water or sewage connections: In response to SA Objective 3 that there is no existing water or sewage connections on the site and development would reduce water drainage capacity of the land which means this is an adverse sustainability effect.	Individuals x2.
Adverse environmental impacts (pollution): In response to Sustainability Appraisal Objective 4, there will be adverse environmental effects from human habitation on this site in terms of vehicle movements, noise, light and air pollution which isn't the case at the moment.	Individuals x2.
Development will increase flood risk on road: In response to Sustainability Appraisal Objective 5, the low lying nature of Whistley Road means that water is directed through this road which is well known to agencies, water/sewage operator and the Council. Development on the site will cause more flooding onto the road and potentially neighbouring properties. The Council would ignore its responsibilities under the Flood & Water Management Act 2010 and make it worse.	Individuals x2.

Key issues raised (Policy GT30 - Land at Whistley Road, Potterne)	Respondent(s)
Upgrades needed to road drainage system: In response to Sustainability Appraisal Objective 5, the road's drainage system would need upgrading.	Individual x1.
Need assurances of sustainable construction practices: In response to Sustainability Appraisal Objective 6, there would need to be assurances that sustainable construction and low carbon energy could be realised to support for a positive or neutral assessment score.	Individual x1.
Archaeological significance: In Response to Sustainability Appraisal Objective 7, there are many sites of archaeological significance around Potterne some of which are very close to the site and that unless archaeological investigations are carries out it cannot be certain that there will be no adverse sustainability effects.	Individual x1.
Amend wording from 'minor' to 'major' adverse effect: In response to Sustainability Appraisal Objective 8, the adverse effect should be major not minor because numerous buildings would be proposed; an old brick wall and hedge which are in character with its surroundings would be demolished for access; the views across the landscape when entering or leaving the village would be obscured by development; and the proposal would dwarf neighbouring properties.	Individuals x2.
Lack of public transport: In response to Sustainability Appraisal Objective 11, the neutral score is wrong due to the lack of public transport; the road is narrow, congested and dangerous; lack of pedestrian infrastructure; and poor visibility at the point of access.	Individuals x2.
Amendment to SA (Primary school has now closed): Representor submits in response to Sustainability Appraisal Objective 12, the assessment is wrong because Potterne primary school has been closed for many years and the road is unsuitable for children and parents to walk to the nearest bus stop. Employment prospects in the local town could be accessed by car only.	Individuals x4.

Table 5.42 Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham Key Issues

Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
Highways and Transport (including access)	
Site access: Access to A3102 is not accessible. Entrance is via narrow country lanes which have speed bumps, awkward turns, vegetation overgrowth and are often flooded. This goes against Policy GT5 (i) 'Be located near, and accessible, to key travelling routes, making the site unsuitable.	Cllr Allison Bucknell.
Accessibility: The site is not easily accessed from the main routes, access is only via country lanes.	Cllr Allison Bucknell.
Access to public transport: Lack of services, public transport and pedestrian access for occupiers of the site. Residents will be reliant on private vehicles.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.
Pedestrian travel and safety concerns: Site proposes safety risks. Site is located on a 60mph road and there is no pavement or street lighting.	Thickthorn and Preston Neighbourhood Group x56; Individual x1, Cllr Allison Bucknell.
Pedestrianisation: Site proposes safety risks to both settled residents and the travelling community. Site is located on a 60mph road and there is no pavement or street lighting.	Thickthorn & Preston Neighbourhood Group x56.
Utilities and Drainage	
Flood risk: Increase of flood risk in the immediate surrounding area, due to evidence of medium/ high groundwater risk on site. This will have multiple impacts. The installation of hard standing will also cause challenges for site drainage.	Thickthorn and Preston Neighbourhood Group x56, Individual x1, Cllr Allison Bucknell.
Ground conditions: Wet ground conditions of the site itself making it unsuitable for residents.	Thickthorn and Preston Neighbourhood Group x56.
Surface and groundwater quality: Pitches on this site will adversely affect surface, ground and drinking water quality/quantity due to information presented above.	Cllr Allison Bucknell.
Drainage infrastructure: Additional residents will put pressure on drainage infrastructure and watercourses.	Thickthorn and Preston Neighbourhood Group x56.
Access to utilities: No accesses to water, sewerage, electricity or gas. There is no electricity supply running past the site and nearest mains sewer is over 2km away, the provision of this infrastructure will be expensive.	Thickthorn & Preston Neighbourhood Group x56, Individual x1, Cllr Allison Bucknell.
Site Design (including privacy)	

Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
Impact on residential amenity: Concerns over potential increased levels of noise, air and light pollution resulting from development on nearby residential amenity due to their close proximity.	Thickthorn and Preston Neighbourhood Group x56, Individual x3.
Landscape	
Landscape Impacts: Development would significantly impact the existing landscape.	Individual x1.
Adverse impact on the character of the area: The sites basic facilities will not be temporary which will change the character of the rural area.	Thickthorn & Preston Neighbourhood Group x56, Cllr Allison Bucknell.
River Quality and Biodiversity	
Biodiversity Net Gain: Sustainability Appraisal Objective 1.1 sets out that it may not be possible to deliver Biodiversity Net Gain on the site. The proposal will result in adverse impacts on the biodiversity of the existing agricultural field.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.
Other	
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.
Loss of agricultural land: Loss of the best and most versatile grade 2 agricultural land.	Thickthorn and Preston Neighbourhood Group x56.
Impact on agricultural use: Site allocation will block access to 26.77 acres of agricultural land for the tenant. This will subsequently impact their farming business.	Thickthorn and Preston Neighbourhood Group x56.
Informing tenants: Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm.	Thickthorn and Preston Neighbourhood Group x56.
Does not meet policy criteria: The site does not meet the criteria for new Gypsy and Traveller sites set out in Policy GT3 (iii).	Individual x1.
Brownfield sites: Not all brownfield options have been included in the site assessments.	Individual x1.
Lack of need: There is no current need for Gypsy and Traveller Sites.	Individual x1.
Access to amenities: The site has poor access to nearby essential facilities such as schools, GP's and other essential services which are already strained.	Individuals x2.
Farming: Site allocation will block access to 26.77 acres of agricultural land for the tenant. This will subsequently impact their farming business.	Thickthorn and Preston Neighbourhood Group x56, Cllr Allison Bucknell.

Key issues raised (Policy GT31 - Land at Thickthorn Farm, Preston Lane, Lyneham)	Respondent(s)
Informing tenants: Agricultural tenants have not been updated by Wiltshire Council on proposals that directly impact their ability to farm.	Thickthorn and Preston Neighbourhood Group x56.
Population increase: The site would double the number of people in the area, people who will not be part of the community, just passing through.	Cllr Allison Bucknell.
Sustainability Appraisal	
Agricultural land: The land is classified as Grade 2 very good agricultural land. Part of the farm would become inaccessible impacting on the business of the farm and causing a significant loss of agricultural land.	Cllr Allison Bucknell.
Sewerage system: There is no mains sewerage and acknowledgement that this is a medium/ high groundwater risk site leads to challenges with installing an off - mains sewerage system.	Cllr Allison Bucknell.
Climate change: Any development on the site is unlikely to reduce our vulnerability to future climate change effects with evidence showing that the "low risk of surface water flooding" is not the case.	Cllr Allison Bucknell.

Gypsies and Travellers Development Plan Document Section 5: Monitoring and Implementation

5.25 Please see below the key issues table listing the key issues raised for the part of the plan within section 5: Monitoring and Implementation namely:

- Monitoring and Implementation

Table 5.43 Monitoring and Implementation key issues

Key issues raised (Monitoring and Implementation)	Respondent(s)
Site specific comments	
Comments received for Land at Thickthorn Farm, Preston Lane, Lyneham (See Policy GT31).	Individual x1.
Comments received for Emergency Stopping Sites (See Policy GT5).	Individual x1.

Gypsies and Travellers Development Plan Document Sustainability Appraisal

5.26 Please see below the key issues table listing the key issues raised for the part of the plan within section 6: Sustainability Appraisal namely:

- Sustainability Appraisal

Table 5.44 Sustainability Appraisal Key Issues

Key issues raised (Sustainability Appraisal)	Respondent(s)
Comments of support	
Policy support: Policy is legally compliant, sound and complies with the duty to co-operate.	Purton Parish Council.
Comments of objection	
Plan is not sound: The Plan is not sound and scores poorly against Sustainability Appraisal objectives, Objective 2 of the Plan and national guidance regarding the location of such sites.	Individuals x8.
Sustainability of the plan: The sustainability of this Plan is unsatisfactory.	Individual x1.
Plan is not sound: The Plan is not sound with regard to many key factors like education, health, transport, drainage, environment and social aspects.	Individual x1.
Limiting open-countryside development: Local planning authorities should very strictly limit new development in open countryside that is away from existing settlements or outside areas allocated in the development plan. They should ensure that sites in rural areas respect the scale of and do not dominate the nearest settled community and avoid placing an undue pressure on the local infrastructure.	Individual x1.

Wiltshire Council

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