

**Gypsies and Travellers Development Plan Document -
Submission of Draft Plan**

Executive Summary

Approval is sought for submission of the Gypsies and Travellers Development Plan Document (the Plan) to the Secretary of State, for independent examination. This follows on from statutory (Regulation 19) consultation, which took place following Council approval in July 2024. The consultation closed on 4 October 2024 and approximately 650 comments were received, the majority of which were from the local community and their representatives.

The Plan addresses the accommodation needs of Wiltshire's travelling communities to 2038. It will, alongside the Wiltshire Local Plan review, which was approved by Full Council for submission to the Secretary of State on 15 October 2024, complete the update of the adopted local plan, the Wiltshire Core Strategy that is now nine years old. Together they will ensure that the accommodation needs of all parts of Wiltshire's communities can be addressed, and the council meets its equalities duty.

Since the close of the consultation, all comments have been thoroughly reviewed and considered to ensure that the Plan is ready for submission. A consultation statement has been prepared (known as the Regulation 22 Statement), which summarises the main issues raised through the consultation and the council's initial response to these. Through reviewing the comments there are some suggested changes to help inform the examination process. These include ensuring appropriate mitigation on allocated sites. The Inspector has the ability through the independent examination to recommend where changes are needed to address soundness and legal compliance issues.

Having considered all the comments received it is considered that the council has complied with the relevant requirements and the Plan is ready for submission for independent examination. Cabinet endorsed the plan at their [meeting on 4 February 2025](#) and resolved to request that the Inspector appointed to examine the Plan takes into consideration any additional supply of pitches approved since the consultation took place. Subject to Full Council approval in February, the Plan will be submitted before 12 March 2025. This is both in line with the timescales in the council's Local Development Scheme and the transitional arrangements set out in the revised National Planning Policy Framework (published December 2024).

The Plan sets out a clear strategy for addressing the housing needs of traveller communities in line with national policy. This is the first local plan for Wiltshire to directly address needs through the provision of allocations and emergency stopping sites, enabling the council to better manage unauthorised and speculative developments.

Proposals

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

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

The council recognises that the plan will be examined in the context of site evidence and delivery. As the examination of the plan will take time and new sites have already begun to be approved on a speculative basis through the submission of planning applications, these will have implications for the number of pitches proposed for allocation. As such, the council resolves to ask the Inspector to take into account the additional supply of pitches that have been approved since the regulation 19 consultation and consider reducing the allocations when assessing the proposed allocations within the Plan.

Reasons for Proposals

To ensure that progress continues to be made on updating Wiltshire's local plan in line with the commitment set out in the council's Local Development Scheme and statutory requirements, and an efficient examination process. This Plan together with the wider Wiltshire Local Plan review will complete the update of the Wiltshire Core Strategy ensuring the housing needs of all sectors of the community are addressed.

Parvis Khansari
Corporate Director - Place

Wiltshire Council

Full Council

25 February 2024

Gypsies and Travellers Development Plan Document - Submission of Draft Plan

Purpose of Report

1. To:
 - (i) Inform Full Council of the response to the Regulation 19 consultation on the Gypsies and Travellers Development Plan Document - Pre-submission Draft (August 2024) ('the Plan');
 - (ii) Seek for Full Council to approve the submission of the Plan for independent examination ; and
 - (iii) Seek delegated authority to make appropriate arrangements for the submission of the Plan and associated documents to the Secretary of State and for the independent examination of the Plan

Relevance to the Council's Business Plan

2. The Council's 'Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025' recognises the importance of a settled base to support the health and well-being and educational needs of these communities. Providing for the housing needs of, and improving health outcomes for, Wiltshire's gypsy and traveller communities aligns with the 2022-2032 Business Plan Mission Resilient Society. The importance of updating the Local Plan to provide an effective policy framework for the sustainable growth of Wiltshire is also explicitly referred to.

Background

3. Council on 24 July 2024 approved the publication of the draft Plan for its final stage of consultation prior to its submission for independent examination. The full background to the Plan is summarised in that report and can be viewed [here](#). At that stage, Regulation 19, representations were invited on soundness and legal compliance.
4. The Regulation 19 consultation commenced on 20 August 2024 and ended on 4 October 2024. In total approximately 650 comments were received from a variety of different individuals and organisations. They included petitions and representations on behalf of residents who came together to submit their responses.

5. At the Regulation 19 stage the council published what it considered to be a sound Plan that met all the necessary legal requirements. To be sound, as set out in the published National Planning Policy Framework ('NPPF') (paragraph 35) at the time of the consultation, a Plan must be:
- (i) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - (ii) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - (iii) **Effective** - deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - (iv) **Consistent** with national policy - enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national policy, where relevant.
6. Section 20(2) of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act') requires that the local planning authority only submit their plan when they consider it to be ready for examination (and they have complied with any relevant requirements contained in regulations under the 2004 Act). Consideration of the Regulation 19 responses and the issues they raise informs the decision to submit the Plan. Before submission there is an expectation that local planning authorities do all they can to resolve any substantive concerns about soundness or legal compliance of the Plan, with particular attention to the duty to cooperate. See Legal Implications below.
7. The examination process allows for the Inspector to determine whether modifications should be made to the Plan to address any soundness or legal compliance issues. Under Section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant.
8. The appointed Inspector will consider all the representations received through the Regulation 19 consultation, together with the evidence relied upon by the council in preparing the draft Plan. The examination will focus on those matters that the Inspector considers need to be tested thoroughly through open hearing sessions before making a recommendation. There are three possible outcomes that Planning Inspectors can recommend following the examination of a Plan. They can recommend that the Plan is:
- Withdrawn (i.e. it would fail the tests of soundness and/or legal compliance and is incapable of addressing such matters and/or the duty to cooperate has not been complied with); or
 - Adopted without main modifications; or
 - Adopted subject to applying a schedule of main modifications.

Where main modifications are recommended, consultation is required on these as part of the examination process before the Inspector concludes the examination

Main Considerations for the Council

6. Having considered all representations, officers have prepared a consultation statement under Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the 2012 Regulations'), known as the Regulation 22 Statement, which is provided at **Appendix 2**. This sets out how the council has undertaken its duties in preparing the draft Plan. The statement summarises the stages of consultation that have taken place, explaining how the public and other stakeholders were invited to participate and make representations, outlining the main issues raised from the Regulation 18 stages of consultation and how the representations at those stages were considered in preparing the Local Plan, whilst also presenting the main issues arising from the Regulation 19 consultation.
7. The statement demonstrates that consultation on the preparation of the draft Plan has been undertaken in accordance with the relevant legislation and council's Statement of Community Involvement (including the temporary arrangements that applied during the COVID-19 pandemic). The statement is required to set out the main issues arising from the consultations and may also, where appropriate, set out the council's initial response to them. The council is not required to provide detailed responses to each representation, but consultees can be reassured that their complete responses will also form part of the submission documents and have been considered in preparing the Regulation 22 Statement. All representations can be viewed via this [link](#).
8. So far as the Regulation 19 stage is concerned, Section 3 of the Regulation 22 Statement provides an overview of the main issues in plan order, and Schedule 2 of Appendix 2 of the Regulation 22 Statement sets these out in more detail together with information on who has commented on these matters.
9. The main issues arising from the Regulation 19 consultation are predominantly, but not limited to, factors relating to individual site allocations and in particular new sites. The challenges to the Plan largely relate to choice of sites and a range of arguments based on policy and technical concerns over the impacts that new development may bring to existing communities.
10. Responses were predominantly received from members of the local community including parish and town councils, as well as prescribed bodies (Environment Agency, Natural England, National Highways), neighbouring local planning authorities, the Ministry of Defence, and planning agents (on behalf of local businesses or individuals). The responses also included representations and petitions on behalf of resident groups objecting to certain site allocations, including in Rowde, Potterne, Thickthorn, and Upper Seagry.
11. Responses from prescribed bodies did not raise any major issues. Natural England identified that an Appropriate Assessment (required to comply with the Habitats Regulations) had been carried out and that the Plan would not result in adverse effects on the integrity of designated environmental sites. Environment Agency identified that a proportion of some sites lay within Flood Zones 2 and 3, and indicated a sequential approach should be taken with any planning applications to ensuring built development on the site lay outside these flood zones.
12. Responses from neighbouring authorities broadly indicated that the Plan was welcomed, with enthusiasm for continuing dialogue to ensure needs would be met in full. Individual responses of note sought to clarify the geographic scope of the Plan to

exclude the New Forest National Park, and that the Plan had required appropriate mitigation for recreational pressures in the vicinity of the New Forest protected sites. Also, one neighbouring authority indicated that there may be merit in monitoring how and where needs for travellers who did not fall within the definition of travellers (as set out in national planning policy) are being met. This monitoring will inform future policy as to the location of future site allocations.

13. Despite communication being undertaken to engage the gypsy and traveller community, a limited response was received. These were limited to landowners of new sites, and landowners of existing sites which are proposed for intensification or safeguarding.

14. Some representations that were made related to council-owned land that is currently leased to tenant farmers, and whether the access to the proposed sites where they are shared might interfere with existing farming operations. Further work has been undertaken, engaging with internal specialists, to consider the potential to have separate accesses. This has led to the need for some changes to be proposed to support the examination (see paragraph 20 below).

15. Frequent issues which were raised in responses included, but were not limited to:

- accessibility to health facilities, shops, schools and other community services;
- highway safety and capacity, quality of access to/from the public highway, and provision of pedestrian access to the site;
- impacts on landscape, including effects of artificial light arising from sites, and ecology;
- flood risk, including surface drainage and connections and capacity to local sewers;
- loss of higher-grade agricultural land to development.

16. These site-specific matters have been assessed through the plan making process. The site selection process was underpinned by technical evidence and specialist input and is supported by the Sustainability Appraisal. The draft policies relating to each allocation are generally considered to provide an appropriate level of prescribed mitigation measures, when read alongside the Plan as a whole, to help inform any future planning application. However, following consideration of the representations consideration has been given to the effectiveness of policies and the need for clarifications or additional policy to ensure appropriate mitigation can be achieved. Policy GT30, which relates to a new site allocation on Whistley Road at Potterne is proposed for deletion as it is no longer available for development.

17. The matter of whether brownfield sites had been considered for potential development is raised in some representations. The Plan in considering existing sites and the potential to meet needs on sites by increasing capacity seeks to minimise the need for new greenfield sites. The methodology and site selection criteria were applied to all available sites which included brownfield land such as depots and salt stores owned by the council. Some currently or previously developed sites were subsequently found to be not available for development. While brownfield land or land of poor agricultural quality would be preferred, these sites did not advance to the site allocation stage for planning reasons.

18. There were a limited number of responses on matters not related to planning such as effect on property values, vicinity of police services, and civil matters such as a perception of hostility from site residents, or personal safety of the local community.
19. The legal duty to cooperate on strategic priorities and matters has been addressed through the plan making process. Regular, meaningful and continuing dialogue with prescribed bodies and neighbouring authorities appropriate to the Plan has taken place. This is set out in the Duty to Cooperate Statement provided at **Appendix 3**, which has been updated following the Regulation 19 consultation. Comments received at the Regulation 19 stage from prescribed bodies and neighbouring authorities are set out in the Regulation 22 statement. As set out in paragraphs 11 and 12, the comments made do not raise any significant issues, notwithstanding this the council will continue to engage with these bodies in a constructive manner as the Plan progresses through the next stages. Statements of common ground are being developed as necessary to support the Duty to Cooperate Statement.

Suggested changes to the Plan

20. While it is the role of the Inspector to ultimately recommend Main Modifications to a plan that are of a substantive nature, the council can identify changes that it considers the examination process will likely need to address. Officers have prepared an initial schedule of changes (**Appendix 4**) to assist the examination. It is not unusual for such schedules to be added to, at the request of the Inspector, as the examination progresses following the discussion of main matters with participants through the examination process.
21. As well as policy changes, as referred to in paragraphs 14 and 16 above, the schedule also includes more minor changes relating to, for example typographical errors and points of clarification. The tables containing five-year supply calculations have also been updated to take into account more recent planning permissions. The council has the ability to make minor changes without the need for them to be recommended by the Inspector. Suggested changes that would comprise main modifications can be considered through the examination process alongside other matters that the Inspector considers needs to be addressed.

Changes to national planning policy

22. A revised NPPF was published in December 2024 and includes transitional arrangements for plans that are being prepared. Any plan that has been submitted for examination on or before 12 March 2025 will be examined under the relevant previous version of the NPPF. Approval by Cabinet and subsequently Council in February will mean this timescale can be met.

Safeguarding Implications

23. Although there are no direct safeguarding implications arising from the proposals, the Plan is a key document in ensuring that the accommodation needs of the traveller community are being met and new sites are in locations, which as a minimum have access to education and health services. Emergency stopping sites are a safe alternative to roadside encampments. These measures contribute to a more inclusive and equitable approach to meeting the needs of the traveller community while promoting safety and access to necessary facilities.

Public Health Implications

24. As recognised in the Health Needs Assessment for Gypsy, Traveller and Boater Populations Living in Wiltshire (July 2019) study, ethnic gypsies and travellers have significantly worse health outcomes than the general population and experience substantial health inequalities. Living conditions are one of the most significant contributory factors to poor health. Providing a settled base in locations where there is access to health and education services and connections to main service infrastructure has public health benefits

Procurement Implications

25. The examination of the draft Plan will entail the need to procure the services of a suitably experienced Programme Officer to help support the appointed Inspector. The role of the Programme Officer is to act as a conduit for information sharing between the council, Third Party representatives and the Inspector. The appointment of a Programme Officer is mandatory. The financial implications include provision for this appointment.
26. The development of the Plan to date has been supported by evidence procured from suppliers, including habitats regulations and gypsy and traveller accommodation assessments, who may be needed to support the council through the examination process. Any further procurement will be undertaken through engagement with the Procurement Team and in line with relevant council policy and national procurement legislation.

Equalities Impact of the Proposal

27. The council is subject to a public sector equality duty under the Equality Act 2010, pursuant to which it must, in the exercise of its functions, have due regard to the need to: (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act; (b) advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
28. The consultation, as all previous consultations, was undertaken in accordance with the council's adopted Statement of Community Involvement, which takes an inclusive approach to consultation ensuring that everyone can be involved. One of the specific ways this was achieved for this consultation was including a leaflet drop to traveller households, which were designed and undertaken with the support of a third-party which is familiar with engagement with the traveller community.
29. Positively planning for the needs of Wiltshire's travelling communities will have a positive impact. A lack of suitable accommodation, as referred to above, can underpin many of the inequalities that they experience.
30. An Equalities Impact Assessment (EqIA) has been carried out alongside the preparation of the Plan which considered the potential for policies and proposals to negatively impact on equality in wider society. An updated EqIA is included at **Appendix 5** and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

Environmental and Climate Change Considerations

31. The council's Local Plan must contain policies designed to secure that the development and use of land in the area contribute to the mitigation of, and adaptation to, climate change in line with Section 19(1A) of the 2004 Act. This Plan is limited in scope but has been prepared in compliance with the duty.
32. Sustainability Appraisal (incorporating the provisions of Strategic Environmental Assessment) and Habitats Regulations Assessment have been undertaken as part of the Plan's preparation. They help to ensure that negative environmental impacts are avoided, appropriate mitigation is identified, and policies and proposals deliver development in a sustainable manner while ensuring that accommodation needs can be addressed. These have been carried out for the Plan and will accompany the draft Plan when it is submitted to the Secretary of State for examination.

Workforce Implications

33. Preparation and implementation of the Plan has workforce implications for services across the council, as well as the Planning Service. A cross-authority delivery group has been supporting the development of the plan including officers from legal, development management, property, housing services and communications, as well as strategic planning. A dedicated project manager is in place. Specialist input from other services in relation to site assessments has been integral to development of the Plan e.g. highways, drainage, landscape, and ecology.
34. Input will continue to be required from services as the Plan progresses to examination and resources aligned to ensure there is sufficient capacity. It is anticipated that this will be absorbed within the current capacity of services but will be kept under review.

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

35. If the proposed decision is not taken the council would fail to meet the obligations it set itself through the Local Development Scheme. It would be failing to meet statutory requirements to have an up-to-date local plan in place. The Plan is being progressed alongside the Wiltshire Local Plan review to address the housing needs of gypsies and travellers and review Core Policy 47 of the Wiltshire Core Strategy, 'Meeting the needs of gypsies and travellers'.
36. The principal risk is that the accommodation needs of these communities will not be met, which has implications for safeguarding and their health and wellbeing. It is likely to also lead to more incidents of unauthorised encampments, speculative development proposals and associated conflict with the settled community.
37. It is important for the council to continue to make progress on preparing the Plan alongside the Wiltshire Local Plan review in line with the commitment set out in the Local Development Scheme (March 2024). This will ensure the housing needs of all sectors of the community are addressed in the development plan for Wiltshire.

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

38. It is considered that the draft Plan is a sound and legally compliant plan (subject to potential main modifications as discussed above). However, there is still the need to

manage any risk that the submitted draft Plan could be found to be unsound or not legally compliant through the examination process and hence recommended for withdrawal by the Inspector. The council can manage this risk by:

- Ensuring that it provides all the documents prescribed by statute (see Legal Implications);
- Submitting further information to inform and assist the examination process in response to representations made to the draft Plan;
- Requesting that the Inspector recommend any modifications necessary to make the submitted draft Plan sound and legally compliant. This can be achieved through a direct request to the appointed Inspector in accordance with the provisions set out in Section 20(7C) of the 2004 Act; and
- Ensuring any detailed matters that need to be subject to refinement are finalised prior to adoption as part of an iterative process. One such example is ensuring that the Mitigation Strategies for protected sites, which support the Habitat Regulations Assessment, continue to be progressed and agreed with Natural England.

39. There remains a reputational risk to the council if it proceeds with the draft Plan. This would likely arise from local people who do not want to see development occurring close to where they live, or areas they value. Whilst this risk is real, the council is nonetheless charged with making difficult, often controversial decisions in the interests of ensuring it maintains an up-to-date development plan and a planned approach to development to ensure all of Wiltshire's communities' needs are met.

Financial Implications

40. The financial implications of taking forward the Plan through the examination stage and onto adoption has been planned for in the Council's Medium Term Financial Strategy (MTFS). They will be met from the Strategic Planning service budget of £0.23m and the Local Plan earmarked reserve, which has a balance of £0.579m as of 31 March 2024.

41. As previously reported and recognised by Cabinet, council-owned land and financial investment is needed to support the delivery and management of transit accommodation (i.e. Emergency Stopping Places). Provision has been made for this in the council's Capital Programme. However, the Emergency Stopping Places Strategy will need to be updated to support the identification and delivery of two further sites, in addition to the one that is set out in the Plan. Any further financial implications will be considered at that time. To ensure sufficient permanent sites can be allocated in the Plan, five sites comprising a total of 22 pitches are also included.

Legal Implications

42. The main legislation governing plan-making is found in the 2004 Act and the 2012 Regulations. In accordance with Sections 19 and 20 of the 2004 Act, the council has a statutory duty to prepare planning policies and maintain an up-to-date development plan (this is further reinforced through the NPPF and Planning Practice Guidance). The draft Plan has therefore been prepared in compliance with primary legislation.

43. In preparing the Plan, it is considered that the council has complied with the statutory duty to co-operate and engaged with prescribed bodies, local communities and other stakeholders throughout the plan making process in accordance with its Statement of

Community Involvement. A report highlighting how the council had fulfilled the duty to cooperate up to the publication of the draft Plan was made available to support the consultation documents at the Regulation 19 stage of the plan making process and has been updated following the consultation. This is provided at **Appendix 3**.

44. The Plan has been supported by a process of sustainability appraisal, in accordance with section 19(5) of the 2004 Act and the Environmental Assessment of Plans and Programmes Regulations 2004, and habitats regulations assessment, in accordance with the Conservation of Habitats and Species Regulations 2017.
45. Reflecting on the entire process to date, it is considered that the council has discharged its functions in respect of Regulation 18 (Preparation of a local plan) and Regulation 19 (Publication of a local plan) of the 2012 Regulations. Representations relating to the draft Plan submitted at the Regulation 19 consultations stage have been duly recorded in accordance with Regulation 20.
46. The next stage of the process (if authorised by Cabinet and Council) is submission of the Plan to the Secretary of State for independent examination. By section 20(2) of the 2004 Act, the council can only submit the Plan for independent examination if: (a) they have complied with any relevant requirements contained in the 2012 regulations; and (b) they think the Plan is ready for independent examination.
47. It is considered that the council has complied with the relevant requirements in the Regulations and will continue to do so. Moreover, although there are certain outstanding issues to resolve, the council considers that all outstanding technical issues can be satisfactorily resolved to allow the Inspector to find the Plan sound at examination. As such, it is considered that there is no impediment to submitting the draft Plan and all supporting documents. According to Section 20(3) of the 2004 Act and Regulation 22(1), the next stage of the process involves the Council submitting a prescribed list of documents to the Secretary of State, alongside the draft Plan. These documents are:
 - the sustainability appraisal report;
 - a submission policies map (i.e. changes to the adopted policies map);
 - a statement setting out how the draft Plan has been prepared¹;
 - copies of the representations received through the Regulation 19 consultation; and
 - such supporting documents considered relevant to the preparation of the draft Plan.
48. The 'supporting documents' include those published as supporting documents to this report together with the appropriate Appendices.
49. Once submitted to the Secretary of State, the draft Plan will be examined by an independent Inspector whose role is to consider compliance with section 20(5) of the 2004 Act, in essence whether the Plan is legally compliant and sound and whether the council has complied with the duty to cooperate. Under section 20(7C) of the 2004 Act, if formally requested by the council, the Inspector can recommend main modifications to the Plan if they are necessary to make it sound and/or legally compliant. As set out above, it is considered that the draft Plan is a sound and legally compliant plan (subject to potential main modifications as discussed above) and that the council has complied with the duty to cooperate.

50. If the Plan passes the examination and is adopted, it will form part of the statutory development plan for the area and be used as such for the purpose of determining relevant planning applications and appeals.

Overview and Scrutiny Engagement

51. Members of the Environment Select Committee (ESC) received informal confidential briefings during the development of the Plan, which allowed for discussion and challenge to the emerging policies in the Regulation 19 plan. With agreement of the Chair, a further briefing has taken place that has been opened up to all members in advance of Cabinet.

Options Considered

52. Consideration has been given to the option of making changes to the Plan prior to submission which would then form part of the submitted plan to be examined. This would require further consultation similar to what was done at the Regulation 19 stage on the proposed changes, together with updated sustainability appraisal and Habitats Regulation Assessment and would result in additional delay to the process.

53. Progression of the draft plan to the formal submission and examination stages will ensure that the council maintains the commitment it gave through the published Local Development Scheme (March 2024). To inform and assist the examination process a schedule of proposed changes has been prepared (**Appendix 4**), as well as the preparation of Statements of Common Ground where necessary. The Regulation 22 Statement (**Appendix 2**) clarifies the council's initial response to the issues raised. Where appropriate, suggested changes are proposed. The Inspector would not treat these as part of the submitted plan but may consider it appropriate for them to be considered in full or part through the examination process when considering the need for main modifications to the Plan.

Conclusions

54. This report seeks Full Council approval to submit the Gypsies and Travellers Development Plan Document to the Secretary of State for independent examination. This represents the final stage of the Plan process, having been through public consultation. Preparation of the plan has had to respond over time to changes in national policy regarding the planning definition of travellers and updated needs assessments. It aims to meet the needs of Wiltshire's travelling community over the plan period. The Plan strives to deliver the Plan objectives to support the evidenced levels of need while also preserving the county's most attractive natural and historic environment.

55. It is considered that the council has complied with the relevant requirements under the 2012 Regulations and will continue to do so, and that the Plan is ready for independent examination. Through carefully considering the Regulation 19 consultation comments and suggesting proposed changes, the council has taken positive steps to prepare for the examination process.

56. Whilst some of the comments received through the Regulation 19 consultation challenge the soundness of the draft Plan, the matters raised are considered capable of resolution through the examination process (whether through justification of the Plan as drafted or through main modifications). It will be within the Inspector's remit to work

pragmatically and positively with the council, and the delegated authority proposed in this report will ensure the council supports an efficient process.

57. The Plan has been in preparation since 2020. The assessment of gypsy and traveller needs in the current development plan (Wiltshire Core Strategy) are now time-expired, and the council have now progressed the Plan to respond to an up-to-date assessment of needs for the travelling community. Subject to Council approval, submission of the draft Plan together with the accompanying documents will be in line with the timescale within the approved Local Development Scheme (March 2024).

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Appendices

Appendix 1 - Gypsies and Travellers Development Plan Document - Pre-submission draft plan (August 2024)

Appendix 2 - Regulation 22(1)(c) Consultation Statement (February 2025)

Updated post Cabinet

Appendix 3 - Duty to Cooperate Statement (Updated January 2025)

Appendix 4 - Schedule of proposed changes (February 2025)

Updated post Cabinet

Appendix 5 - Equalities Impact Assessment

Background Papers

None