
Wiltshire Gypsies and Travellers Development Plan Document

Sustainability
Appraisal Report - Non-Technical
Summary

Pre-Submission Draft (Regulation 19)

August 2024

1. Introduction

- 1.1 This is the Non-Technical Summary of the Sustainability Appraisal (SA) Report of the draft Wiltshire Gypsies and Travellers Plan (the 'draft Plan'). It is published alongside the draft Plan for consultation at the Regulation 19 stage of plan preparation.
- 1.2 The Planning and Compulsory Purchase Act 2004¹ requires Local Plans to be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.² Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.3 Wiltshire Council is reviewing the Wiltshire Core Strategy, adopted in January 2015, and a separate Gypsies and Travellers Development Plan Document has been prepared to review Core Strategy Core Policy 47 (Meeting the Needs of Gypsies and Travellers).
- 1.4 The SA Report presents the results of the SA process so far, as the Plan has developed. It reports on how the SA has informed the development of the Plan.

2. Wiltshire Gypsies and Travellers Plan

- 2.1 The draft Wiltshire Gypsies and Travellers Plan (the 'Plan') sets out Wiltshire Council's strategic planning policies for meeting the accommodation needs of gypsies and travellers and travelling showpeople. It will replace 'Core Policy 47: Meeting the needs of gypsies and travellers' of the Wiltshire Core Strategy (adopted January 2015).
- 2.2 The Plan covers the period to 2038, consistent with the plan period of the wider Wiltshire Local Plan review which is being prepared alongside it. It has been prepared in accordance with national planning policy including Planning Policy for Traveller Sites (PPTS) and the National Planning Policy Framework (NPPF). It is based on evidence in the form of a Gypsy and Traveller Accommodation Assessment³ (GTAA) to establish the accommodation needs of Wiltshire's travelling community from 1 April 2024 to 31 March 2038.
- 2.3 Consistent with national policy⁴, the Plan seeks to address the accommodation needs of gypsies and travellers and travelling showpeople who meet the planning definitions as follows:

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

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

3. Sustainability Appraisal and Strategic Environmental Assessment

- 3.1 Sustainability Appraisal (SA) is required during the preparation of a Local Plan, under the regulations implementing the provisions of the Planning and Compulsory Purchase Act 2004. SA promotes sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental,

¹ Planning and Compulsory Purchase Act 2004 19 (5) (a) (b)

² The reference to relevant legal requirements refers to Strategic Environmental Assessment

³ Wiltshire Gypsy and Traveller Accommodation Assessment 2024 (Opinion Research Services, 2024)

⁴ PPTS Annex 1 (Department for Communities and Local Government, 2023)

economic and social objectives. It applies to any of the documents that can form part of a Local Plan, including core strategies, site allocation documents and area action plans.

3.2 This SA incorporates Strategic Environmental Assessment (SEA) in line with the EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive'). The Directive came into force in the UK in 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations').

3.3 The overarching objective of the SEA Directive is:

“To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.” (Article 1).

3.4 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. It applies in this case to the draft Wiltshire Gypsies and Travellers Plan.

3.5 SA (incorporating SEA) is an iterative assessment process which plans and programmes are required to undergo from an early stage as they are being developed, to ensure that potential significant effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. It also requires the monitoring of significant effects once the plan/programme is implemented.

4. Compliance with the requirements of the SEA Regulations

4.1 The SA Report complies with the requirements of the SEA Regulations and this is shown in Table 1.1 of the SA Report.

5. Consultation in the Sustainability Appraisal process

5.1 The requirements for consultation on the SA Report are set out in the SEA Regulations⁵. These are:

- Reg 12 (5) – *‘when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies⁶’*
- Reg 13 (1) – *‘every draft plan...for which an environmental report has been prepared...and its accompanying environmental report...shall be made available for the purposes of consultation’*
- Reg 13 (2) (a) and (b) – *‘send a copy of those documents to each consultation body; take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan...’*

5.2 The SA Scoping Report⁷ for the Wiltshire Gypsies and Travellers Plan has undergone consultation previously, alongside the Regulation 18 Gypsies and Travellers Plan, from 13th January 2021 to 9th March 2021. The three ‘consultation bodies’ Natural England, Environment Agency and Historic England were consulted on the Scoping Report.

⁵ The Environmental Assessment of Plans and Programmes Regulations 2004

⁶ [Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004](#) defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies are Historic England, Natural England and the Environment Agency

⁷ Gypsies and Travellers Plan 2019-2036 Sustainability Appraisal (incorporating Strategic Environmental Assessment) Scoping Report (Wiltshire Council, May 2021) [Gypsy and Travellers - planning - Wiltshire Council](#)

5.3 The SA Scoping Report has since been updated and a revised draft⁸ is being consulted on as part of the consultation on the Regulation 19 Plan. The SA Report of the Plan at the Regulation 19 stage is also being consulted on alongside the Plan.

6. Habitats Regulations Assessment

6.1 Planning Practice Guidance (PPG) states that where a Local Plan requires a Habitats Regulations Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended), the sustainability appraisal should take account of the findings of that Habitats Regulations Assessment⁹. A Habitats Regulations Assessment¹⁰ has been undertaken on the Draft Wiltshire Gypsies and Travellers Plan and the main findings are summarised in section 1.6 and chapter 5 of the SA Report.

7. Sustainability Appraisal Methodology

7.1 Chapter 2 of the SA Report sets out the methodology adopted for the SA which is in line with the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), SEA Regulations and government guidance on the Strategic Environmental Assessment (SEA) Directive¹¹.

8. Sustainability Appraisal Scoping

8.1 The 'scoping' stage of the SA is the first stage in the process and involves identifying the scope and level of detail of the information to be included in the SA report. It sets out the context, objectives and approach of the assessment and identifies relevant environmental, economic and social issues and objectives.

8.2 The scoping stage is a key stage in the SA process and a Scoping Report¹² has been produced which is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the SA process is proportionate and relevant to the plan being assessed.

8.3 The key requirements for an SA Scoping Report are as follows:

- Identifying other relevant plans, programmes and sustainability objectives
- Baseline characteristics, providing information on relevant aspects of the current state of the environment and the likely evolution thereof, and any existing environmental problems which are relevant to the plan
- Identifying key sustainability issues and problems
- Developing a Sustainability Appraisal Framework that allows the prediction and assessment of effects considered likely to arise from the implementation of the Plan

9. Assessment of likely effects of Potential Development Site Options

9.1 Chapter 4 of the SA Report sets out the main findings of the assessment of 'reasonable alternative' potential development sites.

9.2 A site selection process has been undertaken by the Council to select these 'reasonable alternative' potential development sites for further assessment through the SA. A summary of the site selection process is shown in Figure 2.1 of the SA Report.

⁸ Wiltshire Gypsies and Travellers Plan 2019-2038 Draft Sustainability Appraisal Scoping Report (Wiltshire Council, July 2024)

⁹ PPG Paragraph: 011 Reference ID: 11-011-20140306

¹⁰ Wiltshire Gypsies and Travellers Plan Habitats Regulations Assessment Appropriate Assessment (LUC, July 2024)

¹¹ A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, September 2005)

¹² Wiltshire Gypsies and Travellers Plan 2019-2038 Draft Sustainability Appraisal Scoping Report (Wiltshire Council, July 2024)

- 9.3 27 sites, consisting of a mix of existing site intensification and new sites, are considered as 'reasonable alternatives' for assessment of likely effects through the SA. These sites are shown in the following table which shows the names of sites and what is proposed on those sites:

Table 1: 'Reasonable alternative' gypsy and traveller sites assessed

Site name	Site proposals
South of Bridge Paddocks	2 additional gypsy and traveller pitches
Rose Field Caravan Site	2 additional gypsy and traveller pitches
Braemar	5 additional gypsy and traveller pitches
Easton Lane	3 additional gypsy and traveller pitches
79 Southampton Road	2 additional gypsy and traveller pitches
Land at Capps Lane	1 additional gypsy and traveller pitch
Dillons Farm	1 additional gypsy and traveller pitch
Greenfield View	1 additional gypsy and traveller pitch
Former Glenville Nurseries	1 additional gypsy and traveller pitch
Lansdowne	7 additional gypsy and traveller pitches
Melbourne View	1 additional gypsy and traveller pitch
The Poplars	2 additional gypsy and traveller pitches
The Poplars Residential Park	7 additional gypsy and traveller pitches
Oak Tree Field	14 additional gypsy and traveller pitches
Land opposite the Laurels	3 additional travelling showpeople plots
Land adjacent Nursteed Park	6 travelling showpeople plots
Petersfinger Business Park	1 additional travelling showpeople plot
Calcutt Park	1 additional gypsy and traveller pitch
Wynns Paddock	1 additional gypsy and traveller pitch
Oxhouse Farm Option 4	Up to 10 gypsy and traveller pitches
Land at Cleverton	Up to 10 gypsy and traveller pitches
Whistley Rd	2 gypsy and traveller pitches
Bushton North	3 gypsy and traveller pitches
Upper Seagry Farm	Up to 5 gypsy and traveller pitches
Housecroft Farm 1	Up to 2 gypsy and traveller pitches
Housecroft Farm 2	Up to 2 gypsy and traveller pitches
Thickthorn Farm Stopping Site	Up to 6 stopping pitches

- 9.4 The SA has identified the likely effects of developing these sites against a range of sustainability criteria. Refer to SA Report Appendix B for further detail of these site assessments.
- 9.5 Table 2 below presents the assessment scores and overall sustainability performance of each site; sites are presented in order of sustainability performance with the sites considered more sustainable towards the top and those considered less sustainable towards the bottom. This assessment has informed the selection of preferred site options by the Council for allocation in the Plan.

Table 2: Summary of the assessment of ‘reasonable alternative’ gypsy and traveller sites (in order of sustainability performance)

Key to table assessment scores				
Major (significant) positive effect	+++ (+3)	Neutral effect 0 (0)	Major (significant) negative effect	--- (-3)
Moderate (significant) positive effect	++ (+2)		Moderate (significant) negative effect	-- (-2)
Minor positive effect	+ (+1)		Minor negative effect	- (-1)

SITE	Sustainability performance (MORE → LESS)	Overall site score/ position (rank)	SA obj 1 overall score	SA obj 2 overall score	SA obj 3 (Water)	SA obj 4 (Air/poll'n)	SA obj 5 (Climate)	SA obj 6 (Energy)	SA obj 7 (Heritage)	SA obj 8 (Landscape)	SA obj 9 (Housing)	SA obj 10 (Inc comms)	SA obj 11 (Transport)	SA obj 12 (Economic)	
Land adj Nursteed Park	MORE SUSTAINABLE ↑	+6/=1st	0	+	0	0	0	+	0	0	+	+	0	++	
Oak Tree Field		+6/=1st	-	+	0	0	0	+	0	0	+	++	+	+	
Lansdowne		+3/3rd	0	+	0	0	0	+	0	0	0	+	0	-	+
Land opposite The Laurels		+2/=4th	-	+	0	0	0	0	0	0	0	+	0	0	+
The Poplars Residential Park		+2/=4th	-	+	0	-	0	+	0	0	0	+	0	0	+
Whistley Rd		+1/=6th	-	-	0	0	0	+	0	-	-	+	+	0	+
Oxhouse Farm		+1/=6th	-	-	0	0	0	+	-	-	-	++	+	0	+
Rose Field		+1/=6th	0	+	0	0	0	0	0	0	0	+	0	-	0
Wynns Paddock		0/=9th	0	+	0	0	--	0	0	0	0	+	0	0	0
Calcutt Park		0/=9th	0	+	0	0	0	0	0	0	0	+	-	-	0
Glenville Nurseries		0/=9th	0	+	0	0	0	0	0	0	0	+	0	-	-
Petersfinger Business Pk		0/=9th	-	+	0	0	--	-	0	0	0	+	+	0	+

SITE	Sustainability performance (MORE → LESS)	Overall site score/ position (rank)	SA obj 1 overall score	SA obj 2 overall score	SA obj 3 (Water)	SA obj 4 (Air/poll'n)	SA obj 5 (Climate)	SA obj 6 (Energy)	SA obj 7 (Heritage)	SA obj 8 (Landscape)	SA obj 9 (Housing)	SA obj 10 (Inc comms)	SA obj 11 (Transport)	SA obj 12 (Economic)
Greenfield View	<p style="text-align: center;">↓</p> <p style="text-align: center;">LESS SUSTAINABLE</p>	-1/=13th	0	+	0	-	0	0	0	0	+	0	-	-
Capps Lane		-1/=13th	0	+	0	0	0	0	0	0	+	-	-	-
Melbourne View		-1/=13th	0	+	0	0	0	0	0	0	+	-	-	-
Upper Seagry Fm		-2/=16th	-	-	-	0	0	+	0	-	+	0	0	0
Dillons Farm		-2/=16th	0	0	0	-	0	0	0	0	+	0	-	-
Braemar		-3/=18th	-	0	0	0	0	0	0	-	+	0	-	-
79 South'ton Rd		-3/=18th	-	0	-	0	0	0	0	-	+	0	-	0
The Poplars		-3/=18th	-	+	0	--	0	0	0	0	+	-	-	0
Thickthorn Farm		-3/=18th	0	-	0	0	0	+	0	-	+	-	-	-
Easton Lane		-4/=22nd	0	+	-	--	-	0	0	0	+	0	-	-
Land at Cleverton		-4/=22nd	-	-	-	0	-	+	-	-	++	0	0	-
Bushton North		-4/=22nd	-	-	0	0	0	+	0	-	+	-	-	-
Housecroft Farm 1		-4/=22nd	0	-	0	0	0	+	0	-	+	--	-	-
Housecroft Farm 2		-4/=22nd	0	-	0	0	0	+	0	-	+	--	-	-
South of Bridge Paddocks		-6/27th	-	0	0	-	0	0	0	0	+	--	-	--

- 9.6 Table 2 shows that site assessment scores ranged from +6 (most sustainable) to -6 (least sustainable). Significant adverse effects were only considered likely against 7 of these sites and it is considered that mitigation measures are likely to be able to reduce these highlighted significant impacts.
- 9.7 No sites are considered likely to have 'major adverse effects' whereby mitigation is considered to be unachievable.
- 9.8 19 of the 27 sites assessed involve the intensification of existing traveller sites and the number of additional pitches/plots proposed on each site is relatively small. For this reason, likely effects, in general, are not considered to be significant and most effects are likely to be neutral or minor. However, moderate adverse effects are considered likely at five existing sites and these are discussed further below.
- 9.9 'Land adjacent Nursteed Park' and 'Oak Tree Field' are considered the most sustainable sites when assessed against the 12 objectives in the SA Framework. No adverse effects were considered likely at Land adjacent Nursteed Park from the addition of 6 plots. The location of this existing site within the urban area of Devizes Market Town, close to town centre facilities, schools, shops, public transport connections and employment, and negligible impacts on biodiversity, landscape and the historic environment make this a very suitable site for intensification. Oak Tree Field is also considered to be located in a very sustainable location next to Salisbury District Hospital, with excellent public transport access to nearby Salisbury and with very few likely adverse effects.
- 9.10 The site considered least sustainable is 'South of Bridge Paddocks'. This is an existing traveller site; it does not have insurmountable issues but scores poorly in sustainability terms, mostly because of its isolated location with very poor accessibility to public transport services and other local services and facilities, meaning that residents will likely be reliant on private transport to access education, jobs, healthcare, shops and other essential services.
- 9.11 Specific circumstances of the seven sites which are considered likely to have moderate (significant) adverse effects, and possible mitigation measures, are discussed below:
- Wynns Paddock - 1 additional gypsy and traveller pitch
- 9.12 Dwellings would be approx. 40m from the A36. Road traffic noise must be assessed and mitigated against. It would appear challenging to mitigate sound levels using barriers and site design. Without a noise assessment it is difficult to say if suitable noise levels would be achievable.
- Petersfinger Business Park - 1 additional travelling showpeople plot
- 9.13 Noise levels from the adjacent A36 are likely to be significant. A Noise Impact Assessment may be required. Air quality in this location will also be impacted by road traffic, particularly close to the road, and further assessment may be required.
- The Poplars - 2 additional gypsy and traveller pitches
- 9.14 This site is adjacent to railway lines and railway noise is likely to be significant. A Noise Impact Assessment would be required should intensification of this site be pursued. It is likely to be difficult to sufficiently mitigate noise levels.
- Easton Lane - 3 additional gypsy and traveller pitches
- 9.15 This site is in close proximity to two railway lines. A Noise Impact Assessment will be required due to noise from the railway lines. It may be challenging to design this site to achieve suitable noise levels. Further development closer to the railway line is not advisable without evidence to demonstrate suitable internal and external noise levels can be achieved.

Housecroft Farm 1 - up to 2 gypsy and traveller pitches

- 9.16 This site is located in the open countryside approx. 2km from Bratton, the nearest village. Bratton has a limited number of services and facilities. Access to most services and facilities is in Westbury approx. 5.8km from the site. There are no public transport services within proximity of this site – the nearest bus stops are in Bratton along the B3098, approx. 2km away, which is not within walking distance. Residents will be dependent on private transport. It is considered that this site offers poor access to essential and non-essential services and facilities. These issues will likely be difficult to mitigate.

Housecroft Farm 2 - up to 2 gypsy and traveller pitches

- 9.17 This site is located in the open countryside approx. 2km from Edington, the nearest village. Edington has a limited number of services and facilities. Access to most services and facilities is in Westbury approx. 6.5km from the site. There are no public transport services within proximity of this site – the nearest bus stops are in Edington approx. 2km away, which is not within walking distance. Residents will be dependent on private vehicles. It is considered that this site offers poor access to essential and non-essential services and facilities. These issues will likely be difficult to mitigate.

South of Bridge Paddocks - 2 additional gypsy and traveller pitches

- 9.18 This site is located in the open countryside approx. 3.8km from the nearest village, Minety. Minety has a limited number of services and facilities. Access to GP surgeries, secondary schools, supermarkets and other services and facilities is further afield in Purton (approx. 5.3km), Cricklade (approx. 7km), Swindon (approx. 9.5km) and Royal Wootton Bassett (approx. 8.5km). There are no public transport services along the B4696 Braydon Road which the site is situated on. The nearest bus stop is on the B4040 Malmesbury Road approx. 1.3km from the site. This site has very poor sustainable transport accessibility. Residents will be dependent on private vehicles. These issues will likely be difficult to mitigate.
- 9.19 It is considered that this site also offers poor access to education facilities and to employment. The nearest primary schools are over 4km from the site in Minety and Ashton Keynes. The nearest significant urban centre (Swindon), offering a range of job opportunities, is approx. 9.5km from this site.

Conclusions on the assessment of 'reasonable alternative' site options

- 9.20 The assessment of the 27 'reasonable alternative' site options found that no sites were considered likely to have 'major adverse effects' whereby mitigation is considered to be unachievable. Moderate adverse effects were considered likely at just 7 of the proposed sites and mitigation measures to reduce those likely effects are considered achievable, although problematic.
- 9.21 The Council has decided to allocate 26 of these 27 sites in the Plan. The reasons for taking the 26 sites forward into the Plan, and for rejecting one site, are outlined in Table 4.3 of the SA Report.

10. Assessment of likely effects of Plan objectives and policies

- 10.1 This section of the SA Report presents a qualitative assessment of the Plan policies against the SA Framework. It also includes an assessment of the Plan's objectives against the objectives in the SA Framework as it is important for the Plan's objectives to be in accordance with sustainability principles. The assessment of policies includes a brief summary of findings and any recommendations for improving the sustainability of a policy. It also includes any mitigation recommended in the Habitats Regulations Assessment (where applicable).

Compatibility of Plan objectives with SA objectives

- 10.2 The objectives of the Plan set out what it is aiming to achieve in spatial planning terms and set the context for the development of options. It is important for the objectives of the Plan to be in accordance with sustainability principles. Therefore, they have been tested for compatibility with the SA objectives. A summary of the assessment findings is presented in Table 3 below:

Table 3: Summary of assessment of Plan objectives against SA objectives

Assessment of Plan objectives against SA objectives												
Plan objective	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12
1	-	-	0	-	0	+	-	-	+	+	0	0
2	0	-	0	-	0	+	0	0	+	+	0	0
3	0	0	0	-	0	+	0	0	+	+	0	+
4	0	-	0	-	0	+	0	0	+	+	0	+

Assessment of Plan policies

- 10.3 The assessment of Plan policies is presented in chapter 5 of the SA Report. The SA has suggested various mitigation measures in relation to policies, many of which have been incorporated into policy. However, the SA makes a series of recommendations for further improving the sustainability of certain policies – these relate to where suggested mitigation measures have not been incorporated into a policy. Table 4 lists these recommendations and Wiltshire Council have provided a response to these recommendations:

Table 4: SA Policy recommendations and Wiltshire Council response

Plan policy	SA Recommendation	Wiltshire Council response	Plan amendment?
GT3	It is recommended that the policy criteria also include reference to protecting and enhancing heritage assets and their settings	Protecting and enhancing the historic environment is adequately covered in national planning policy and legislation which does not repeating in the plan.	No
GT3	It is recommended that the policy criteria also include reference to avoiding, where possible, development of Best and Most Versatile agricultural land	Covered in NPPF	No
GT3	It is recommended that the policy criteria also include reference to avoiding land that is impacted by contamination or if, during development, any evidence of historic contamination or likely contamination is found, requiring further assessment.	Environmental Health and the Environment Agency are consultees in the development management process and they hold the technical information on these matters. It is not required, for this reason, to include additional criteria related to environmental health/public protection.	No
GT3	It is recommended that the policy criteria also include reference to impacts of odour and vibration	As above.	No
GT3	It is recommended that the policy criteria also include reference to ensuring that a site is accessible to essential services, facilities and sustainable modes of transport, including public transport services, to reduce reliance on use of private vehicles	While this is desirable, PPTS does not prohibit traveller sites in open countryside. Wiltshire is largely rural and public transport availability varies greatly. It would constrain land availability to require accessibility to essential services and facilities and sustainable modes of transport.	No
GT4	Policy GT4 seems to allow greater flexibility than the Local Plan in allowing sites to come forward adjacent to settlements. It is recommended that this policy and the supporting text are reviewed to ensure consistency with Wiltshire Local Plan policies.	Policy now aligns with Local Plan strategy to support development within settlements.	Yes
GT5	It is recommended that greater clarity is provided in this policy to ensure that adverse effects are minimised on the natural, built and historic environment. At present, the policy refers to adverse impacts on 'environmental designations', but effects are possible on local landscape features, local habitats, protected and priority species and the historic environment which are not 'designations'	Reference to the protection of ecological features has been included. Other matters are considered to be sufficiently covered in the policy, or by national planning policy (historic environment).	Yes
GT6	Neither the policy nor the supporting text specifically refers to the New Forest SAC, SPA and Ramsar and it is recommended that this is added to both policy and supporting text	The site falls within the New Forest Protected Sites 13.5 and 15km Recreation Zones of Influence. The policy and supporting text now require that a proposal secures a financial	Yes

		contribution to the New Forest Protected Sites Mitigation Strategy	
GT8	The issue of the proximity of the old canal is covered in the supporting text but not in the policy itself. It is recommended that a requirement for the consideration of this issue, to ensure that proposals do not conflict with policy on safeguarding historic canal routes, is added to this policy	This is included as an informative in the supporting text. Mapping evidence suggests that the old canal route runs along the northern boundary of the site, and this was not raised in the context of the allowed appeal for the existing pitch in this location.	No
GT10	There is no mention in supporting text or in the policy of potential noise issues from the site's proximity to the A361. It is recommended that potential noise issues are discussed within the supporting text and a requirement for a Noise Impact Assessment included in the policy	Para 4.34 identifies buffers and fencing as measures to separate development from highway noise and fumes. Based on the evidence, the supporting text now discusses the site's proximity to the A361. Policy GT10 has been amended to require a noise assessment to inform a proposal.	Yes
GT11	It is recommended that the policy and supporting text include measures to mitigate any potential recreational impacts on Lime Kiln Down CWS and measures to mitigate potential effects on nearby public rights of way.	This is covered through the requirement for contribution to the New Forest Protected Sites Mitigation Strategy.	No
GT12	It is recommended that the policy and supporting text include measures to mitigate any potential impacts on nearby public rights of way and measures to mitigate potential effects of road noise from the A361	There is no technical evidence that noise is an issue at this site. It was also not a reason for refusal nor discussed at the last appeal (allowed) for the site.	No
GT13	It is recommended that the policy and supporting text also include a requirement for a Noise Impact Assessment and measures to mitigate any potential impacts on nearby public rights of way, specifically the adjacent bridleway which may benefit from additional screening	Policy GT13 and supporting text already include a requirement to undertake a noise assessment due to proximity to the rail line. The site assessment notes that there is limited room for additional buffering/planting within the site. It also mentions that the site is well screened from the wider landscape. The presence of the existing site from the bridleway (DMAR41) is already evident / obvious along the adjacent short length of this route. A moderate intensification of the site is unlikely to generate much potential for significant adverse landscape or visual effects.	No
GT15	It is recommended that the policy and supporting text also include measures to mitigate any potential impacts of noise from the nearby railway line and to include a requirement for a Noise Impact Assessment	This was not identified as an issue in the reasons for refusal addressed at appeal which resulted in planning permission for the existing four pitches. The rail line lies in a cut.	No

GT17	The supporting text and the SA note that there is evidence of groundwater flood risk present on site. This is not included within the policy text. It is therefore recommended that the policy text also requires drainage measures to manage groundwater, not just surface and foul water	The Policy has been updated to reflect groundwater flood risk.	Yes
GT17	It is recommended that the policy and supporting text include the need for mitigation measures in relation to the possibility of impacts from light on amenity due to the proximity of Devizes Town Football Club	The evidence suggests that the football ground may be floodlit but it is unconfirmed. At this stage there is no evidence of an adverse impact on amenity.	No
GT18	It is recommended that the policy and supporting text include discussion and mitigation requirements to effectively manage potential impacts from A36 road noise, air quality and potential land contamination	In view of the SA evidence, the policy and supporting text now require a noise assessment that establishes noise levels and any mitigation required to ensure acceptable living conditions.	Yes
GT20	It is recommended that the policy and supporting text include discussion and mitigation requirements to effectively manage potential impacts from noise and odour from the adjacent farm and that mitigation measures for drainage reference the groundwater risk, not just surface and foul water	A suitably worded policy requirement has been included to reflect the need to assess the effects from the adjacent agricultural use, and potential for contaminated land. The site assessment does not identify a groundwater flood risk issue.	Yes
GT24	Policy text makes no mention of providing buffers to trees on north western, western and southern boundaries. It only refers to '10-metre buffer to existing on-site hedgerows'. It is recommended that the policy and supporting text include reference not just to existing hedgerows on site boundaries but also to existing trees	The supporting text now includes reference to trees and the policy includes them in the 10m buffer requirement.	Yes
GT27	It is recommended that policy text makes specific reference to requirement for a site survey to assess grassland quality	Bullet five in the Policy refers to ecological mitigation and compensation measures as required to protect grassland habitat. This would ordinarily be informed by a grassland survey	No
GT27	It is recommended that policy text that requires provision of sufficient drainage measures also includes groundwater flood risk as this is highlighted in the supporting text and SA as being an issue in this area	Groundwater is now referenced in Policy.	Yes
GT27	It is recommended that policy text makes specific reference to requirement for a geophysical survey prior to development to check for as-yet unrecorded sub-surface archaeological features	The final bullet in the policy ensures that any identified heritage assets are conserved with mitigation measures secured as necessary. This would be established through the survey work referenced in the supporting text.	No
GT27	It is recommended that policy text prioritises renewable or low carbon energy generation as this source could meet much of the site's energy demands	The site can be connected to mains power which is the preferred means of supply.	No

GT28	It is recommended that the policy include a specific requirement for a geophysical survey prior to development to check for as-yet unrecorded sub-surface archaeological features	Penultimate bullet in policy deals with heritage assets.	No
GT28	It is recommended that policy text prioritises renewable or low carbon energy generation as this source could meet much of the site's energy demands	The site can be connected to mains power which is the preferred means of supply.	No
GT29	It is recommended that policy text makes specific reference to the requirement for a survey to assess for the presence of great crested newts	See para 4.115 which includes the requirement to complete a survey.	No
GT29	It is recommended that policy text that requires provision of sufficient drainage measures also includes groundwater flood risk as this is highlighted in the supporting text and SA as being an issue in this area	Groundwater is now referenced in Policy.	Yes
GT29	It is recommended that policy text prioritises renewable or low carbon energy generation as this source could meet much of the site's energy demands	The site can be connected to mains power which is the preferred means of supply.	No
GT30	It is recommended that policy text prioritises renewable or low carbon energy generation as this source could meet much of the site's energy demands	The site can be connected to mains power which is the preferred means of supply.	No
GT31	It is recommended that the policy text include sufficient drainage measures not only for surface water but also for groundwater as it is highlighted in the supporting text and SA that there is evidence of groundwater flood risk at this site	The policy now also refers to groundwater management to be covered in the drainage strategy.	Yes
GT31	It is recommended that policy text prioritises renewable or low carbon energy generation as this source could meet much of the site's energy demands	There is no requirement for emergency stopping sites to be serviced with power supply.	No

11. Assessment of likely cumulative effects of the Plan

Combined effects of plan policies

- 11.1 Having assessed the effects of policies in the Plan individually, it is important to consider their combined effects in relation to one another.
- 11.2 Policy GT1 makes provision for 134 permanent pitches for gypsies and travellers and 8 plots for travelling showpeople, during the period 2024 to 2038. The relatively small-scale of the sites allocated in the Plan and their dispersed nature across the County mean that the combined effects of policies are not likely to be significant. The majority of sites are for intensification of existing sites for a very small number of pitches/plots and this will likely have negligible or no effects in combination with other Plan policies.
- 11.3 The SA assessment of individual site options has shown that there are some likely adverse effects at a very local level and that mitigation measures are achievable to reduce these effects.

Secondary, cumulative and synergistic effects of plan policies

- 11.4 Considering the combined effects of policies, there may be further effects upon the same resources and receptors as a result of synergistic i.e. multiple effects.
- 11.5 No significant secondary, cumulative or synergistic effects are considered likely. The numbers of pitches/plots on individual sites are small and often involve the intensification of existing sites, and the sites allocated in the Plan are dispersed right across the County making the likelihood of secondary, cumulative or synergistic effects negligible.

Cumulative effects between the Gypsies and Travellers Plan and other plans

- 11.6 Likely cumulative effects have been considered between this Plan and other adopted and emerging Wiltshire Council plans, namely:
- Wiltshire Core Strategy – adopted January 2015
 - Wiltshire Housing Site Allocations Plan – adopted February 2020
 - Chippenham Site Allocations Plan – adopted May 2017
 - Wiltshire Local Plan Review – Reg 19 consultation Autumn 2023
- 11.7 These Plans contain a number of different housing and employment site allocations. However, given the small size and dispersed locations of the proposed site allocations in the Gypsies and Travellers Plan, and the majority of sites involving limited intensification of existing sites, significant effects are not considered likely with policies or site allocations in the above Plans. Proposed new greenfield site allocations (GT24 - GT31) are not likely to have any cumulative effects with the Plans listed above.
- 11.8 Consideration has also been given to any likely cumulative effects of the proposed new greenfield site allocations (Policies GT24 – GT31) with any allocations in ‘made’ neighbourhood plans. Policies GT24, GT25, GT26 and GT31 sites are remote from the nearest settlements and will not have cumulative effects with any ‘made’ neighbourhood plan allocations.
- 11.9 Policy GT27 ‘Land at Cleverton’ site falls just within Lea and Cleverton parish and is adjacent to the Little Somerford parish boundary. Neither Lea and Cleverton nor Little Somerford parishes have ‘made’ neighbourhood plans and there are no likely cumulative effects with other neighbourhood plan allocations.
- 11.10 Policy GT28 ‘Land at Oxhouse Farm, Rowde’ site is near to Rowde village and within Rowde parish. Rowde parish does not have a ‘made’ neighbourhood plan and there are no likely cumulative effects with other neighbourhood plan allocations.

- 11.11 Policy GT29 'Land at Upper Seagry Farm' site is near to Upper Seagry village and within Seagry parish. Seagry does have a 'made' neighbourhood plan but there are no development site allocations within that Plan and cumulative effects are not considered likely.
- 11.12 Policy GT30 'Land at Whistley Road' is located on the edge of Potterne village and within Potterne parish. Potterne does have a 'made' neighbourhood plan which allocates five small housing sites (A3-A7). Neighbourhood plan Policy PNP1 states that these '*are allocated for residential (or residential /mixed use) development within the settlement boundary*'. However, given the location of these five site allocations within the village, no cumulative effects with 2 gypsy and traveller pitches on Whistley Road are considered likely.

12. Monitoring

- 12.1 The SEA Directive states that '*member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*' (Article 10.1). In addition, the Environmental Report should provide information on a '*description of the measures envisaged concerning monitoring*' (Annex I (i)) (Stage E).
- 12.2 Table 7.1 in the SA Report proposes a small number of indicators to monitor the likely significant effects highlighted in the SA. These indicators relate to likely significant effects relating to Plan policies GT9 (Easton Lane), GT13 (The Poplars) and GT18 (Petersfinger Business Park). Likely significant effects relating to SA objectives 10 and 12 relate to sites that, due to their location, have poor access to services and facilities and poor access to public transport services – no monitoring indicators have been suggested for these sites as access to these services is likely to remain poor as the sites are not of a sufficient scale to be served by their own site-specific services.

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