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# **Gypsies and Travellers Plan 2019-2036**

**Sustainability Appraisal  
(incorporating Strategic  
Environmental Assessment)  
Scoping Report**

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**May 2021**

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# 1. Introduction

**1.1.** This report relates to the sustainability appraisal (SA) of the Wiltshire Gypsies and Travellers Plan – hereafter referred to as ‘the Plan’. It sets out the proposed scope and level of detail of the SA of the Plan and is often known as a ‘scoping report’.

**1.2.** The Plan will identify the future level of need for accommodation for Gypsies and Travellers, including travelling showpeople, in Wiltshire to 2036. It will identify sites to meet permanent and temporary accommodation needs, based

on a Gypsy and Traveller Accommodation Assessment<sup>1</sup> (GTAA). The GTAA Report was published in January 2021 alongside the Regulation 18 consultation<sup>2</sup> on the Plan.

**1.3.** The timetable for the progression of the Plan, according to the Council’s updated Local Development Scheme<sup>3</sup> (LDS) is shown below. Note this already accounts for a short delay that occurred at the beginning of the process.

Stage of development of the Plan	Dates
Initial consultation on the scope of the plan (to take place alongside Local Plan Review consultation)	Qtr 1 2021
Plan preparation (including evidence gathering and informal consultation)	Qtr 2 2020 - Qtr 3 2021
Publication of plan for pre-submission consultation	Qtr 4 2021
Submission to Secretary of State	Qtr 3 2022
Examination (including hearing and receipt of Inspector’s report)	Qtr 3/Qtr 4 2022
Adoption	Qtr 4 2022

**1.4.** This initial ‘scoping’ stage of the sustainability appraisal involves compiling information on the current and future situation in relation to the Gypsy and Traveller community in Wiltshire and the key issues. It establishes an evidence base for ongoing SA work related to the Plan and culminates in a framework of sustainability objectives.

**1.5.** The information contained within this report will be used to assess the extent the Plan contributes towards the objective of achieving sustainable development.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.6.** The purpose of the planning system is to contribute to the achievement of sustainable

development. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a

<sup>1</sup>Wiltshire Gypsy and Traveller Accommodation Assessment (ORS, 2020)

<sup>2</sup>[Gypsy and Travellers - Wiltshire Council](#)

<sup>3</sup>Local Development Scheme (Wiltshire Council, 2020)

sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

**1.7.** The purpose of SA is to promote the achievement of sustainable development within planning policy. This is done by appraising the social, environmental and economic effects of a plan, and reasonable alternatives, from the outset and in doing so, helping to ensure that sustainable development is treated in an integrated way in the preparation of the Plan.

## **Legal requirements**

**1.8.** SA is a legal requirement of the Planning and Compulsory Purchase Act 2004 for all Development Plan Documents (DPDs), which includes the Wiltshire Gypsies and Travellers Plan.

**1.9.** The National Planning Policy Framework (NPPF), paragraph 32, states that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements<sup>4</sup>. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

**1.10.** This report meets the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into law EU Strategic Environmental Assessment (SEA) Directive 2001/42/EC. These requirements are outlined in Section 2 of this report and at the beginning of relevant sections.

**1.11.** The two key procedural requirements of the SEA Regulations are that:

1) a report is published for consultation alongside the draft Plan that presents an appraisal of the draft Plan i.e. discusses ‘likely significant effects’ that would result from plan implementation, and reasonable alternatives; and

2) when deciding on ‘the scope and level of detail of the information’ which must be included in the SA Report there is a consultation with nationally designated authorities concerned with environmental issues.

**1.12.** This ‘Scoping Report’ is concerned with (2) above. It presents a proposed scope for the SA so that the nationally designated authorities (which, in England, are Natural England, the Environment Agency and English Heritage) can provide timely comment.

## **Joint assessment**

**1.13.** Although the legal requirements for SA and SEA are separate and distinct, they have a high degree of overlap and guidance advises that an integrated approach can be followed if both assessments are being undertaken. Throughout this report therefore, where reference is made to SA, it relates to the combined process of sustainability appraisal and SEA.

## **Habitats Regulations Assessment**

**1.14.** A Habitats Regulations Assessment (HRA), in accordance with the Habitats Regulations (2017) (as amended) is a further consideration in respect of the Wiltshire Gypsies and Travellers Plan. HRA concerns Natura 2000 sites, which are areas protected for their nature conservation value; these areas consist of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites.

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<sup>4</sup>The reference to relevant legal requirements refers to Strategic Environmental Assessment.

**1.15.** An HRA screening exercise will be undertaken by Wiltshire Council ecologists in consultation with Natural England to determine if the Plan is likely to have significant adverse effects on the integrity of any European Sites. If the HRA screening identifies that an Appropriate Assessment (AA) is required, this will need to be conducted alongside the development of the Plan. Its findings will also inform the findings of the SA.

## Report structure

**1.16.** This report is structured in the following way:

Chapter 2: Methodology

Chapter 3: Stage A1 - Review of other plans, policies and sustainability objectives

Chapter 4: Stage A2 - Baseline information

Chapter 5: Stage A3 - Key sustainability and environmental issues and problems

Chapter 6: Stage A4 - Sustainability Appraisal Framework

Chapter 7: Stage A5 - Consultation requirements

Chapter 8: Next steps

## 2. Methodology

**2.1.** The methodology for this scoping stage of the Sustainability Appraisal (SA) was developed in accordance with the following guidance:

- A Practical Guide to the Strategic Environmental Assessment (SEA) Directive
- (ODPM, 2005)
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, 2005)
- Planning Practice Guidance – Strategic Environmental Assessment and Sustainability Appraisal (MHCLG, 2021)

**2.2.** This report meets the scoping requirements of the SEA Regulations which are as follows:

The SEA Regulations (2004) - requirements for deciding on the scope and level of detail of the information that must be included in the report.

Schedule 2 - Regulation 12(3)

1. ...'its relationship with other relevant plans and programmes'
2. 'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme'

3. 'The environmental characteristics of areas likely to be significantly affected'

4. 'Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive'

5. 'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation'

6. '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 bodies' (Regulation 12 (5))

## Stages of the Sustainability Appraisal

2.3. The SA will be carried out in a series of stages which are outlined in Figure 1.

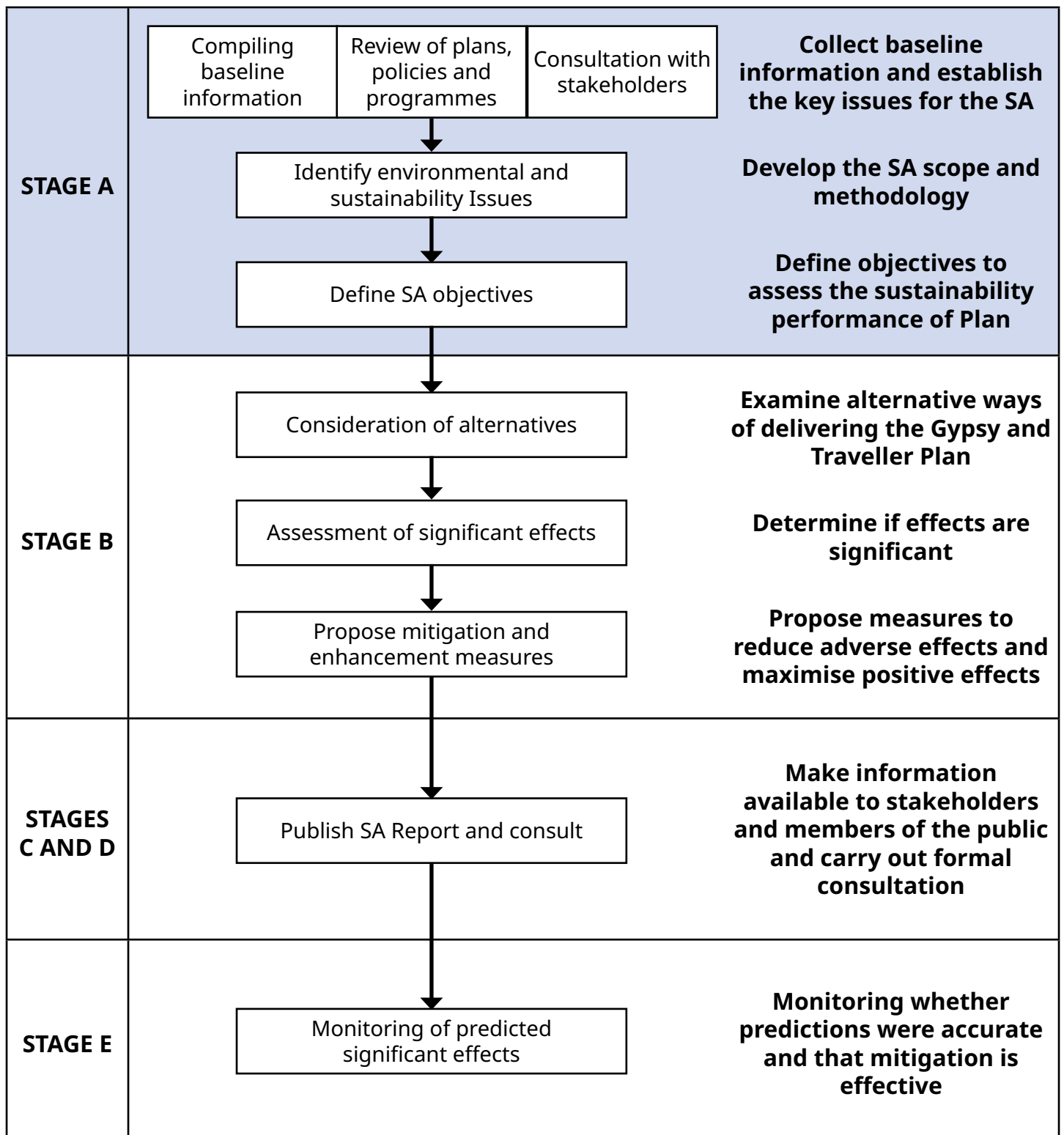


Figure 1: Stages of Sustainability Appraisal

**2.4.** This scoping report includes the information relating to Stage A (highlighted) in Figure 1. The individual tasks within Stage A, which will meet the requirements of the SEA Regulations, are further explained in Sections 3-7 of this report.

### Scope of the Sustainability Appraisal

**2.5.** The sustainability topics considered in this scoping report encompass those required by Regulation 12(3) of the SEA Regulations but include wider social and economic considerations required for a SA. They also reflect a broad understanding of the anticipated scope of the effects of the Plan. The topic areas have been informed by the National Planning Policy Framework (NPPF) and reflect those used for the SA of the Wiltshire Local Plan Review in order to ensure consistency.

**2.6.** In addition, topics have been included to ensure that those of particular relevance to the Plan have been considered. These topics are summarised in the table below, with a comparison against the topics required by the SEA Regulations. SA guidance also advises that any inter-relationships between topic areas are considered. Cross cutting matters have therefore been addressed within this report for each topic area. Cross cutting issues refer to where elements of one topic relate to elements of either one or a number of the other topic areas.

#### The SEA Regulations require an assessment of:

‘the likely significant effects on the environment including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as — biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).’

**Table 2: Sustainability topics proposed for the SA of the Gypsies and Travellers Plan**

SEA Regulations issues for consideration	SA topic areas	Sustainability theme
Biodiversity	<b>Biodiversity</b> Incorporating fauna and flora	Environmental
Fauna		
Flora		
Soil	<b>Land and soil resources</b>	
Water	<b>Water resources</b>	
Air	<b>Air quality and environmental pollution</b>	

SEA Regulations issues for consideration	SA topic areas	Sustainability theme
Climatic factors	<b>Historic environment</b>	Environmental
Cultural heritage, Including architectural and Archaeological heritage	<b>Historic environment</b> Incorporating cultural heritage, architectural and archaeological heritage	
Landscape	<b>Landscapes</b>	
Population	<b>Population and housing</b>	Social
Human health	<b>Healthy and inclusive communities</b>	
N/A	<b>Transport</b>	Economic
	<b>Economy and enterprise</b>	
Material assets	Material assets and infrastructure matters are discussed within different topic areas.	Environmental Social Economic
Inter- Relationships	Important cross cutting matters are addressed within each topic area.	

### 3. Task A1 - Identifying other plans, policies and sustainability objectives

#### The SEA Regulations (Regulation 12(3)) require consideration of:

...'its relationship with other relevant plans and programmes'

'The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation'

#### Introduction

**3.1.** The SA Report must provide information on the Plan's "relationship with other relevant plans and programmes" and "the environmental protection objectives, established at international, [European] Community or [national] level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation". This review helps identify obligations and highlights the objectives of other organisations and service



providers which might be pursued during the development of the Plan.

**3.2.** The Plan is influenced in various ways by other plans and programmes, including European and national legislation, national guidance and those plans of neighbouring authorities. Documenting these influences helps to ensure that the Plan is consistent with up to date policy, is informed by sound information and this also helps in the process of identifying environmental and sustainability issues.

### **Review of plans, policies and objectives**

**3.3.** The Wiltshire Core Strategy and Wiltshire Local Plan SA Scoping Reports<sup>5</sup> provide a comprehensive review of policies, plans and objectives that describe the sustainability context of those documents; they include policies, plans and objectives relating to the natural, built and historic environment at the international, national, regional and local levels. Some of those documents already reviewed for the Core Strategy and Local Plan SAs are relevant to the Gypsies and Travellers Plan and it is not intended to repeat those in this section.

**3.4.** However, there is European and national legislation, national policy guidance, plans of neighbouring authorities and local documents that are of specific relevance to the emerging Plan. Those we propose to include are listed below:

#### **International**

- European Directive 2001/42/EC (The SEA Directive) (2001)

#### **National**

- Town and Country Planning Act 1990 (as subsequently amended)
- Criminal Justice and Public Order Act 1994
- Housing Act 1996/ Homelessness Act 2002
- Human Rights Act 1998
- Housing Act 1985 (as amended), in conjunction with the Housing and Planning Act 2016 Section 124

- Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans (2015)
- Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment (2016)
- Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2015)
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015)
- Equalities Act 2010
- Planning Policy for Traveller Sites (DCLG, 2015)
- National Planning Policy Framework (2019)
- Review of housing needs for caravans and houseboats: draft guidance (MHCLG, March 2016)
- Planning Practice Guidance (MHCLG, 2021)
- Localism Act (2011)
- Guidance on Managing Unauthorised Camping (DCLG, 2004)
- Supplement to 'Managing Unauthorised Camping: A Good Practice Guide (ODPM, 2005)
- Guide to effective use of enforcement powers Part 1: Unauthorised encampments (ODPM, 2006)
- Guide to Effective Use of Enforcement Powers – Part 2: Unauthorised Development of Caravan Sites (DCLG, 2007)
- Local authorities and Gypsies and Travellers: a guide to responsibilities and powers (DCLG, 2007)

#### **Regional (including relevant plans/ policies of neighbouring authorities)**

- Bath and North East Somerset Council Adopted Core Strategy 2029 Policy CP11 Gypsies, Travellers and Travelling Showpeople
- Christchurch and East Dorset Local Plan (Part

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<sup>5</sup>Wiltshire Core Strategy Sustainability Appraisal Scoping Report (Wiltshire Council, April 2010) and Wiltshire Local Plan Review Sustainability Appraisal Scoping Report (Wiltshire Council, August 2020)

## 1 Core Strategy) 2013-2028

- Cotswold AONB Management Plan 2008-2018
- Cranborne Chase and West Wiltshire Downs AONB Management Plan 2014-19
- Dorset Councils Joint Gypsy and Travellers Site Allocations DPD
- Mendip District Council Local Plan 2006-2029
- New Forest District Council Local Plan Part 1 2016-2036
- New Forest National Park Authority 2016-2036 Local Plan
- New Forest National Park Recreation Management Strategy 2010 – 2030
- North Wessex Downs AONB Management Plan 2014-2019
- Partnership Plan for the New Forest National Park 2015 – 2020
- South Gloucestershire Core Strategy 2006-2027
- South Somerset Local Plan 2006-2028
- Swindon Borough Local Plan 2026
- Test Valley Local Plan 2014-2029
- Vale of White Horse District Council Local Plan Part 2 2031
- West Berkshire Core Strategy 2006-2026

## Local

- Wiltshire Core Strategy Core Policy 47 (Wiltshire Council, 2015)
- Gypsy and Traveller Accommodation Assessment (ORS, June 2020)
- Wiltshire Council Emergency Stopping Places Strategy (Wiltshire Council, 2018)
- Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document (Wiltshire Council, 2021)
- Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025
- Health Needs Assessment of the Gypsy, Roma, Traveller and Boater population in Wiltshire (Wiltshire Council, 2019)
- Planning for Wiltshire's Gypsy and Traveller Communities Reg 18 Consultation Report (Wiltshire Council, 2021)
- Wiltshire Countryside Access Improvement Plan 2015 – 2025
- Wiltshire Council Level 1 Strategic Flood Risk Assessment (JBA Consulting, May 2019)

A brief review of all documents listed above is presented in Appendix A and information from these has been used to inform the subsequent sections of this report.

## 4. Task A2 - Baseline information

### Introduction

#### **The SEA Regulations (Regulation 12(3)) require consideration of:**

'The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme'

'The environmental characteristics of areas likely to be significantly affected'

**4.1.** This 'baseline' section identifies what is currently happening in the Wiltshire local authority area with regards Gypsies and

Travellers and the likely evolution of the situation if current trends were to continue. It meets the requirements of the SEA Regulations as shown in the text box above.

**4.2.** This additional baseline information on Gypsies and Travellers supplements that presented in the Wiltshire Core Strategy and Wiltshire Local Plan SA Scoping Reports, which include information on the natural, built and historic environment of Wiltshire). This additional baseline information provides the basis for predicting and monitoring the environmental and sustainability effects of the Plan and will help to identify current problems and alternative ways of dealing with them.

**4.3.** A practical approach to the collection of baseline information has been taken as there will be opportunities to update this scoping report as further consultation is undertaken. This report has been updated to reflect the Wiltshire GTAA (June 2020) and 'Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document' (Wiltshire Council, 2021). Stakeholders will have an important role to play in this process by providing information and feedback which will inform the Plan, and associated SA, as it progresses.

## **A profile of Wiltshire**

**4.4.** The adopted Wiltshire Core Strategy describes Wiltshire as being one of the largest unitary authorities in England. The authority's area covers approximately 3,255 square kilometres and has a population of approximately 460,000 people. Wiltshire adjoins the higher tier local authorities of Dorset, Somerset, South Gloucestershire, Oxfordshire, West Berkshire, Hampshire, Swindon and Bath and North East Somerset.

**4.5.** Wiltshire is a largely rural area encompassing many natural and historic features which make it distinctive, including parts of three Areas of Outstanding Natural Beauty, part of the New Forest National Park, over 16,000 listed buildings, over 240 conservation areas and a World Heritage Site. The high number of conservation areas reflects the importance of the county's heritage,

much of which is recognised at national and international levels. Wiltshire's heritage is unique and outstanding, ranging from pre-historic monuments such as Stonehenge, to links with the industrial revolution, including canal and railway structures. Among the issues and challenges facing Wiltshire's heritage is the pressure from encroachment on its sensitive historic landscapes.

**4.6.** Wiltshire also includes an element of the Western Wiltshire Green Belt, which protects the openness of the countryside between Bath, Bradford-on-Avon and Trowbridge. The urban area of Swindon, while predominantly within Swindon Borough, has expanded into Wiltshire.

**4.7.** Deprivation is generally low and communities benefit from relatively safe environments. Wiltshire enjoys strong sub-regional links and is within commutable distance of London, Bristol, Swindon, South Wales and the south coast; for instance, via rail, the M4, A36 and A303.

**4.8.** Wiltshire's largest settlements are Chippenham, Salisbury and Trowbridge. They are designated in the Core Strategy as 'Principal Settlements' which are the focus for growth due to their ability to provide infrastructure and services to the population. Below this, market towns, local service centres and villages accommodate additional development but to a much lesser extent.





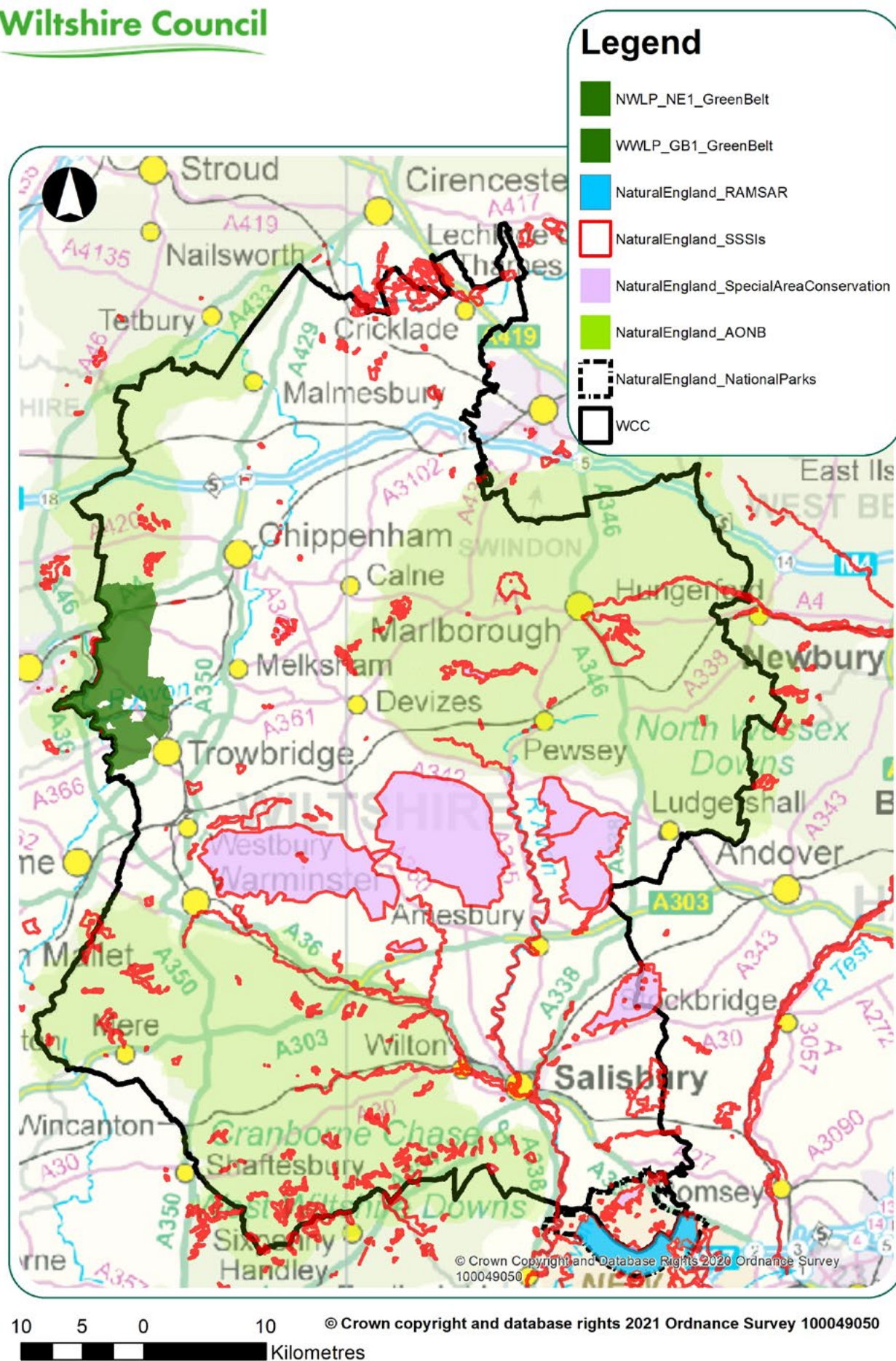


Figure 2: Wiltshire's key environmental designations

**4.9.** The SA Report that accompanied the Wiltshire Core Strategy identified key sustainability issues in Appendix D. The Core Strategy is now being reviewed. The Local Plan Review will cover the plan period 2016 - 2036. The SA Scoping Report for the Local Plan Review, dated September 2020, sets out the social, environmental and economic sustainability issues for Wiltshire at Table 5.1.

### **Background to the Gypsy and Traveller communities in Wiltshire**

**4.10.** A well-established Gypsy and Traveller community exists in Wiltshire. Most Gypsies and Travellers in Wiltshire identify themselves as English Travellers or Romany Gypsies, with some Irish Travellers. These communities reside on a mix of local authority sites, privately owned sites and unauthorised sites. Research<sup>7</sup> has shown that the majority of sites are within the north, west and south of the county. New Age Travellers can also be found in Wiltshire, although their settlement pattern is more transient with numbers increasing during the summer months. There are also a small number of travelling showpeople yards in the county.

**4.11.** It is often generalised that Gypsies and Travellers are a uniform, cohesive community, however the reality is they are a diverse group of communities which share some features such as nomadism but have their own histories and traditions. There is often fragmentation between different families and between cultural groups. The main cultural groups include Romany Gypsies, Irish Travellers, and New Age Travellers. Under the Equality Act 2010, several groups have recognition as ethnic groups protected against discrimination. These include English, Welsh and Scottish Gypsy Travellers, Irish Travellers, and Romany Gypsies and Roma people. However, Showpeople and New (or New Age) Travellers are not recognised within these definitions and may not be protected (Parliament, 2019).

**4.12.** Many Gypsies and Travellers in Wiltshire pursue an active itinerant lifestyle and are generally self-employed, sometimes occupied in scrap-metal dealing, laying tarmac, seasonal agricultural work, casual labouring, and other employment. However, these traditional patterns are changing whereby the community has become increasingly settled, thereby increasing the demand for new permanent Gypsy and Traveller sites.

**4.13.** In accordance with guidance from the Ministry of Housing, Communities and Local Government (MHCLG), Wiltshire Council undertakes a bi-annual count of caravans across Wiltshire. Whilst caravans do not necessarily relate to the number of pitches, the count data is used to monitor the pressures on existing sites, both authorised and unauthorised.

### **Current Gypsy and Traveller Site Provision in Wiltshire**

**4.14.** The Wiltshire 2020 Gypsy and Traveller Accommodation Assessment (2020 GTAA) states that there are 3 public sites; 54 private sites with permanent planning permission; no private sites with temporary planning permission; 5 sites that are tolerated for planning purposes; and 8 unauthorised sites. There are also 5 Travelling Showmen's yards. There is currently no public transit provision as the Council owned transit site at Odstock has been sold. Overall, these provide a total of 332 residential gypsies and traveller pitches in Wiltshire as of June 2020, and 13 plots for travelling showpeople.



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<sup>7</sup>Wiltshire GTAA (ORS, 2020)



**Table 3: Sites and Pitches in Wiltshire – June 2020<sup>8</sup>**

Category	Sites	Pitches
<b>Gypsy/Traveller sites</b>		
Private with permanent planning permission	54	256
Private sites with temporary planning permission	0	0
<b>Total Private Sites</b>	54	256
Public Sites (Council and Registered Providers)	3	50
Unauthorised Sites (8 unauthorised sites and 5 tolerated sites)	13	26
<b>TOTAL</b>	70	332
Travelling showpeople sites		
Travelling showpeople sites with permanent planning permission	3	7
Travelling showpeople sites with temporary planning permission	0	0
Unauthorised/tolerated travelling showpeople sites	2	6
<b>TOTAL</b>	5	13



<sup>8</sup>Wiltshire Gypsy and Traveller Accommodation Assessment (ORS, June 2020). The Council continues to monitor planning permissions so these numbers may change.

4.15. Figure 3 below shows that the majority of sites are located in the north and west of the county, with only a very small number in the east, and the remainder of sites in the south of the county.

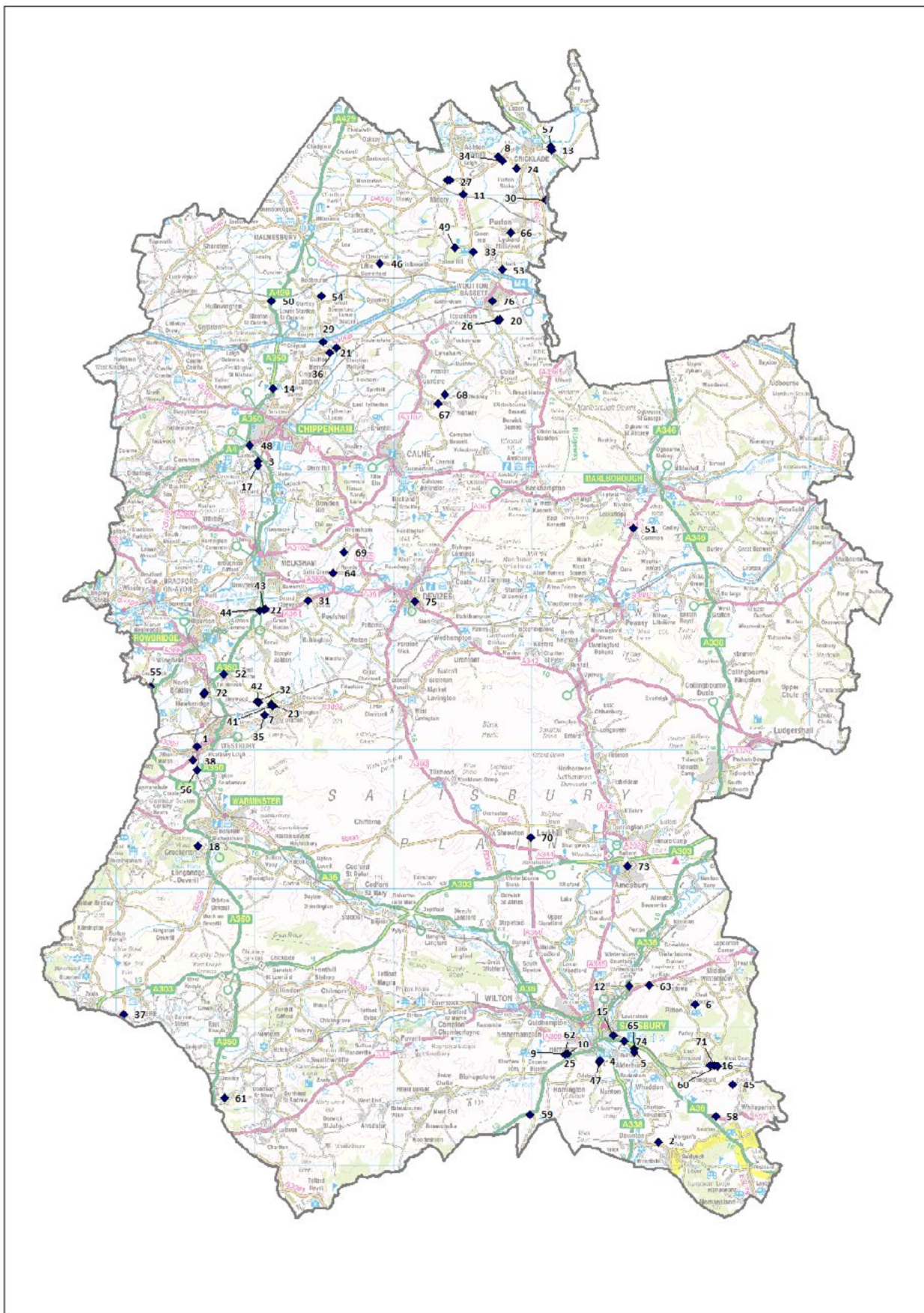


Figure 3: Traveller sites in Wiltshire



**4.16.** According to the 2020 GTAA, Wiltshire has a year-round issue with short-term unauthorised encampments. Most of the population are New Age Travellers and are a constant presence on the roadside around Wiltshire. The more traditional Gypsy and Traveller population tend to stop over the summer months, primarily for employment opportunities.

**4.17.** Information held by the Council recorded a total of 155 encampments in 2016, 296 encampments in 2017, 225 encampments in 2018 and 161 encampments between January and September 2019 (2020 GTAA, para 7.41). This shows that the number of encampments fluctuates year on year. The recommendations in the 2020 GTAA and the Emergency Stopping Places (ESP) Strategy<sup>9</sup> seek to provide stopping sites in three broad locations to assist with provision of temporary accommodation (see below).

**4.18.** In addition, caravan count information is routinely compiled by the Council bi-annually, except for summer 2020 and winter 2021 due to the coronavirus pandemic. The 2020 GTAA was, amongst other, informed by caravan count data, but advises that while these data can support the work on accommodation need, caution must be applied because they only represent a snapshot in time.

### **Tackling inequalities – National context**

**4.19.** In April 2012 the Coalition Government published 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers'. Government were concerned that Gypsies and Travellers score low on a number of social indicators, some of the worst outcomes of any ethnic group. The Ministerial Working Group was set up to look at ways to reduce and tackle the inequalities faced by the Gypsy and Traveller community.

**4.20.** The report contains 28 commitments which target the following areas:

- Identifying ways of raising educational aspirations and attainment of Gypsy, Roma and Traveller children.
- Identifying ways to improve the health outcomes of Gypsies and Travellers within the proposed new structures of the NHS.
- Encouraging appropriate site provision; building on £60m Traveller Pitch Funding and New Homes Bonus incentives.
- Tackling hate crime against Gypsies and Travellers and improving their interaction with the criminal justice system.
- Improving knowledge of how Gypsies and Travellers engage with services that provide a gateway to work opportunities and working with financial services industry to improve access to financial products and services.
- Sharing good practice in engagement between Gypsies and Travellers and public service providers<sup>10</sup>.

**4.21.** These national areas of focus help set the context for the type of inequalities or issues the Gypsy and Traveller population may be facing in Wiltshire.

**4.22.** In Spring 2019, the House of Commons Women and Equalities Committee published a report<sup>11</sup> on tackling inequalities faced by Gypsy, Roma and Traveller communities (Parliament, 2019). This provided a comprehensive overview of the current national state of inequalities faced by these communities. The report highlighted the breadth of agencies and organisations with responsibilities towards addressing these challenges, with recommendations for action upon several departments in central and local government, NHS England, the Care Quality Commission, and Ofsted. The recommendations from this report, in summary, are:

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<sup>9</sup>Emergency Stopping Places Strategy (Wiltshire Council, 2018)

<sup>10</sup>Page 6, 'Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers' (DCLG, 2012)

<sup>11</sup>PARLIAMENT, HOUSE OF COMMONS 2019. Tackling inequalities faced by Gypsy, Roma and Traveller communities [online] Available from: [publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/report-summary.html](https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/report-summary.html)



- Improving Government department's practice and strategy development to tackle gypsy and traveller inequalities
- Addressing data gaps at Government and NHS level specific to Gypsy and Travellers
- Department for Education to undertake an audit of all local authorities how they tackle school attendance of gypsy and traveller children
- Ofsted to take a more active role scrutinising what schools are doing to engage with traveller parents on a range of key issues such as attendance, relationships and sex education
- NHS England to consider when allocating funding, how Clinical Commissioning Groups integrate tackling health inequalities
- Local authorities to map sites which have access to a minimum standard of basic amenities and which do not.
- Training for senior staff on Public Sector Equality Duty
- Government to work with community organisations to encourage travellers to come forward and report hate crime, and explain what their rights are
- Local authorities to lead on improving awareness of the consent culture and healthy relationships amongst travellers to tackle domestic abuse, and to provide trusted support for reporting

**4.23.** A letter from Stephen Greenhalgh MP, Minister of State for Communities, to local authorities in early 2020 highlights the vulnerability of some travellers during the pandemic:

'Some Gypsies and Travellers are particularly vulnerable and have the potential to be disproportionately impacted by COVID-19, and some will already have been asked to shield for 12 weeks due to high risk underlying health conditions. Social-distancing or self-isolation may be particularly challenging for members of these communities due to often confined and communal households, and restricted living conditions on many sites. In addition, we know that some families lack basic amenities including

running water, adequate sanitation, and refuse disposal facilities, all of which are essential to limit the spread of the virus and keep people safe. Many will no longer have access to places they may have relied on for water and cleaning purposes, due to closures of leisure centres, churches and petrol station toilets. The closure of many recycling centres has also had an impact on the disposal of refuse.

It is for Local Authorities to determine how best to support vulnerable groups during this unprecedented period in line with their public health responsibilities. To enable compliance with COVID-19 public health guidance on hygiene requirements, access to basic facilities is essential. This might involve the provision of additional temporary water, sanitation and waste disposal facilities to those currently lacking access to these, or making alternative stopping places available, such as transit sites, suitable local authority land, and holiday campsites which may have closed and have established facilities.'

**4.24.** While the pandemic may come to an end the need for the provision of basic amenities on traveller sites remains a key sustainability issue.

## **Census 2011**

**4.25.** For the first time, the 2011 Census included a dedicated tick box for the ethnic group 'Gypsy or Irish Traveller'. This has meant there is new data available to explore the characteristics of the Gypsy and Irish population in areas such as qualifications, economic activity, family relationships, health and accommodation. In January 2014 the Office for National Statistics published 'What does the 2011 Census tell us about the characteristics of Gypsy or Irish Travellers in England and Wales?' The key points from the report are as follows:

- 58,000 people identified themselves as Gypsy or Traveller in the 2011 Census.
- Most people who identified as Gypsy or Irish Traveller identified with an English only national identity (66%) and were Christian (64%).
- Gypsy or Irish Travellers has the highest proportion with no qualifications for any ethnic group (60%) – almost three times higher than for England and Wales as a whole.

- Gypsy or Irish Traveller was the ethnic group with the lowest proportion of respondents who were economically active (47%), with half of those economically active employed, and the highest number of self-employed for any ethnic group at 26%.
- Just under half of Gypsy or Irish Traveller households had dependent children (45%) – above the average for the whole of England and Wales (29%).
- Whole house or bungalow was the most common type of accommodation for respondents who identified as Gypsy or Irish Traveller, at 61 percent, followed by caravan or other mobile or temporary structure at 24 percent.
- Gypsy or Irish Travellers were more than twice as likely to live in social housing than the overall population in England and Wales (41 percent compared to 16 percent) and less likely to own their accommodation outright (21 percent compared to 26 percent).
- Gypsy or Irish Travellers has the lowest proportion of any ethnic group rating their general health as 'good' or 'very good' at 70 percent compared to 81 percent.

**4.26.** This is the first time the Census has allowed respondents to identify themselves as Gypsy or Irish Traveller so there is no data available for comparison to see trends over time. Further, most respondents appear to have been living in bricks and mortar (i.e. bungalows) and not on traveller sites. In other words, travellers living the traditional way of life may not have responded to the Census, so in reality the traveller population may be larger. However, the data is still valuable as it is acknowledged that historically there has been a lack of information about this ethnic group.

**4.27.** The Government will undertake a new 2021

Census, but the results may not become available before the Plan is adopted. It is anticipated that for the first time, travelling showpeople and circus people will form an independent group in the census.

## **Census 2011: Gypsy and Irish Traveller population in Wiltshire**

### **Population**

**4.28.** In response to the Census 2011, 757 people in Wiltshire self-identified as Gypsy or Irish Traveller; 380 males and 377 females. 730 of the Gypsy and Irish Traveller population in Wiltshire were born in the UK. The age structure of the adult gypsy and Irish Traveller population in Wiltshire (see table at the bottom of the page).

**4.29.** To aid comparison the age structure of Wiltshire as a whole has also been provided. There are clear differences; the Gypsy and Traveller population is much younger with only 26% of the population 50+ years. Conversely the population of Wiltshire as a whole is ageing with 47% of the population 50+ years and only 13% under 24.

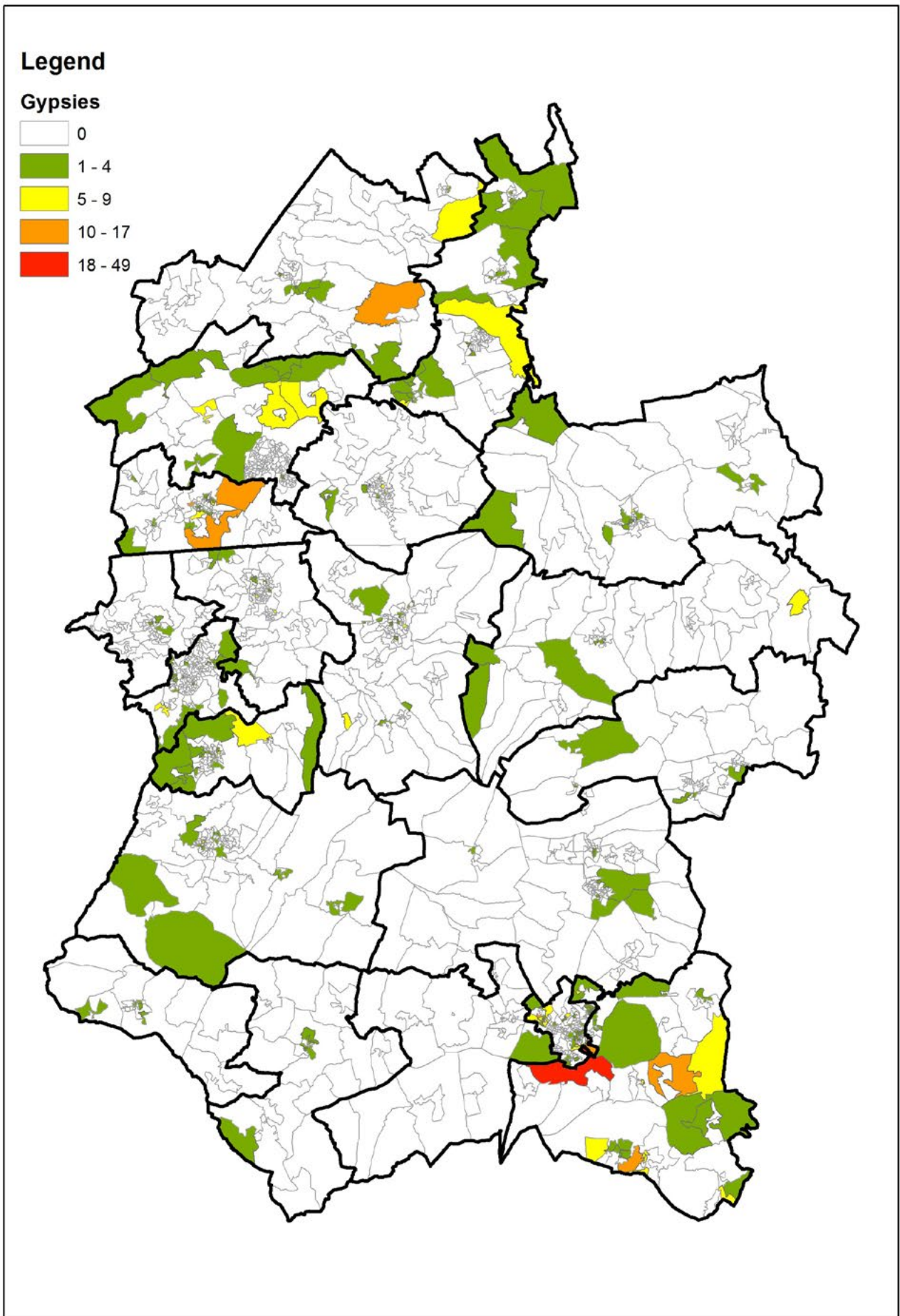
**4.30.** This has implications when planning for the gypsy and traveller population as younger populations are likely to continue to grow. It could imply that Gypsies and Travellers have more children than the population of Wiltshire as a whole. Only 26% of the population in the 50+ age bracket could be an indication of a number of issues so assumptions are more challenging to make; health issues, standard of living, moving away from Wiltshire and so on.

**4.31.** When asked about national identity over 80% of the gypsy traveller population in Wiltshire identified as 'English only'.

**4.32.** The distribution of Gypsies and Travellers living in Wiltshire, taken from the 2011 Census, is shown on the map on the following page (figures by Output Area).

**Table 4: Age structure of the adult gypsy and Irish Traveller population in Wiltshire**

Age	Gypsy and Irish Traveller	% of population	Wiltshire (all ethnicities)	% of population
16-24 years	102	21	47,797	13
25-49 years	262	53	153,885	40
50 + years	126	26	179,331	47



**Figure 4: Distribution of Gypsies and Travellers living in Wiltshire (Census 2011)**

## Economic activity

**4.33.** Economic activity concerns those aged 16 and over who are employed or unemployed (those who are actively seeking and available for work). In Wiltshire there are 490 Gypsy or Irish Traveller people aged 16 or over; of these, 216 are economically active - 191 are in employment, 127 of these are an employee and 58 are self-employed (also 6 students studying and in employment). There are 25 people classified as unemployed who are actively seeking and available for work.

**4.34.** The rest of the adult population in Wiltshire are economically inactive (274 people). Of these 274 people, 93 are looking after children/family, 60 are long term sick or disabled, 41 are retired, 19 are full time students and 60 are classified as 'other'.

**4.35.** The occupations of the Gypsy and Irish traveller population in Wiltshire from the 2011 Census are as follows:

**Table 5: Occupations of the Gypsy and Irish traveller population in Wiltshire (Census 2011)**

Occupation	White: Gypsy or Irish Traveller
All categories	490
1. Higher managerial, administrative and professional occupations	10
1.1 Large employers and higher managerial and administrative occupations	6
1.2 Higher professional occupations	4
2. Lower managerial, administrative and professional occupations	40
3. Intermediate occupations	15
4. Small employers and own account workers	73
5. Lower supervisory and technical occupations	36
6. Semi-routine occupations	80
7. Routine occupations	66
8. Never worked and long-term unemployed	145
8.1 Never worked	132
8.2 Long-term unemployed	13
Not classified	25
Full-time students	25

## Health

**4.36.** In the 2011 Census the Wiltshire Gypsy and Traveller population (757 people) classed their general health in the following categories; 299 felt their health was 'very good', 230 'good health', '132 'fair health', 67 'bad health' and 29 'very bad health'. This means the Gypsy and Irish Traveller population in Wiltshire is similar to the national

traveller population in that they have the lowest proportion of any ethnic group rating their health 'good' or 'very good' when compared to the overall population of England and Wales.

## Wiltshire Health Needs Assessment 2019

**4.37.** The study's main findings are:

The health outcomes for Gypsy and Traveller communities are worse compared to the general



population across the life course. Gypsy and Traveller communities experience poorer health and die earlier than the rest of the population and are less likely to receive effective continuous health care that meets their needs. They are largely invisible to health service commissioners.

- Gypsy and Traveller communities experience wide ranging inequalities and the lack of suitable accommodation underpins many of the inequalities that people in this community experience.
- A lifetime of experiencing racism and discrimination in education, access to health care, employment and other social and public contexts impacts adversely on their health.
- Life expectancy is 10-12 years less than the general population, and there is significant health inequality in dental, maternal, child and mental health.
- This is compounded by reduced use and access of healthcare services. There are also issues with domestic abuse, and attendance in education. Cultural norms and customs often mean that health needs cannot be met in a targeted way. This requires a mindful approach by healthcare providers and other public services.
- More Gypsy and Traveller children have special educational needs compared to all children in Wiltshire.

**4.38.** The study makes several recommendations:

- Improve awareness and understanding of Gypsy, Roma, Traveller needs
- Support and promote close working relationship with the GRT and Boater community
- Promote community-driven enablement
- Improve data collation and data sharing
- Respond to national policy changes and local survey results

## **Wiltshire Traveller Strategy (2020)**

**4.39.** The Wiltshire Traveller Strategy 2020-25 refreshed the previous 2010 Traveller Strategy. The

Strategy identifies 7 strategic priorities:

Wiltshire Traveller Strategy (2020)

**4.39.** The Wiltshire Traveller Strategy 2020-25 refreshed the previous 2010 Traveller Strategy. The Strategy identifies 7 strategic priorities:

1. Educational attainment and attendance
2. Preventative services (primary, secondary and tertiary) – including management of long-term conditions; screening; immunisations; pharmacy and dental services
3. Safeguarding and violence prevention
4. Mental health
5. Maternal health and early years
6. Social care and carer support
7. Place and Community e.g. site safety, access to refuse points

**4.40.** Four cross cutting themes run through all these priorities:

1. Increasing awareness of the GRT and Boater culture and health needs
2. Improving multi-agency dialogue and information sharing to work towards reducing inequalities using current services and resources available
3. Improved local data collation and analysis specific to GRT and Boater communities in Wiltshire
4. Facilitate engagement with the GRT and Boater communities

**4.41.** Strategic Priority 7 'Place and Community' is of particular relevance in planning terms. The Strategy notes that living conditions and environmental factors are one of the most significant contributory factors to poor health in the GRT community. Actions for this strategic priority are:

- Work with the GRT community members to improve pathways for addressing housing and site condition concerns, both for local authority owned and private Traveller sites where feasible

<sup>12</sup>[www.wiltshireintelligence.org.uk/library/gypsy-traveller-and-boater-populations-health-needs-assessment/](http://www.wiltshireintelligence.org.uk/library/gypsy-traveller-and-boater-populations-health-needs-assessment/)

- Work with Boater community members and the Canal and River Trust to ensure adequate provision of amenities, and access to moorings, to provide a safe environment for all
- Ensure that private Traveller sites have access to a minimum standard of basic amenities
- Engage and inform GRT and Boater community members about site safety (e.g. fire safety awareness)
- Empower front-line staff to recognise and sign-post issues experienced by GRT and Boater community members to the appropriate services (e.g. safeguarding; maternity services)
- Work across services (e.g. healthcare, education) to maximise utility from sharing data gained when new residents access a site or when a new private site is registered; also consider utilising communication points to provide health promotion messaging (e.g. leaflets on local maternity services sent with housing support information)

### Wiltshire Gypsies and Travellers planning policy context

**4.42.** Adopted Wiltshire Core Strategy Core Policy 47 - Meeting the needs of gypsies and travellers – sets out requirements for permanent pitches and plots for 2011-21 and site assessment criteria to determine planning applications for new pitches

and plots. The supporting text describes that the Council will review the Policy through a standalone development plan document.

**4.43.** To this end, Wiltshire Council published a consultation document under Regulation 18 of the Town and Country Planning Regulations 2012 on 13th January 2021. The consultation closed on 9 March 2021. The purpose of that document was to seek views on the proposed scope of the emerging Plan which will cover the period 2019-2036; the key issues affecting Gypsy, Traveller and Travelling Showpeople in Wiltshire; to present an outline methodology for assessing existing and new sites to accommodate pitch and plot requirements; proposed site selection criteria for permanent and temporary accommodation; and a call for sites. Prior to this, the need for Gypsy and Traveller accommodation over the plan period had been identified through a GTAA completed in June 2020.

**4.44.** The document proposes pitch and plot requirements for gypsies/travellers and travelling showpeople based on the published 2020 GTAA. The document proposes to meet accommodation needs of travellers that do meet the definition in PPTS Annex 1, and of those who do not. Pitch and plot requirements of undetermined households are proposed to be met through the planning application process as the Council cannot plan for undetermined need.

**Table 6: Permanent pitch requirements of gypsy and traveller households meeting the planning definition**

Years	0-5	6-10	11-15	16-18	Total
	2019-23	2024-28	2029-33	2034-36	
Pitches	76	22	21	13	132

**Table 7: Accommodation need for Gypsy and Traveller households that do not meet the planning definition**

Years	0-5	6-10	11-15	16-18	Total
	2019-23	2024-28	2029-33	2034-36	
Pitches	22	23	26	8	79

**Table 8: Permanent pitch requirements of undetermined gypsy and traveller households**

Years	0-5	6-10	11-15	16-18	Total
	2019-23	2024-28	2029-33	2034-36	
Pitches	14	6	6	3	29

**Table 9: Permanent pitch requirements of showpeople households who meet the planning definition**

Years	0-5	6-10	11-15	16-18	Total
	2019-23	2024-28	2029-33	2034-36	
Pitches	10	1	0	1	12

**Table 10: Permanent pitch requirements of undetermined showpeople households**

Years	0-5	6-10	11-15	16-18	Total
	2019-23	2024-28	2029-33	2034-36	
Pitches	0	1	0	1	2

**4.45.** The consultation document also identifies a proposed requirement for three emergency stopping sites for travellers, one in the north, one in the south and one in the west of the county. No set number of pitches are proposed. Emergency stopping sites are sites likely to be equipped with basic facilities such as fence, gate and hardstanding, porta-toilets and a skip for rubbish disposal. Linked with this, the GTAA considered the published Wiltshire Emergency Stopping Places Strategy and agreed with the findings in terms of the number of sites proposed.

**4.46.** The consultation document proposes a strategy to meet identified need, based on a three-tier site assessment approach as follows:

- Intensification of existing lawful sites to meet on-site need
- Regularisation of unauthorised sites to meet this need
- New sites to accommodate residual need

**4.47.** The document sets out assessment criteria for permanent sites, and to aid determining

planning applications. They will inform the technical work on site assessments. The criteria stem from the adopted Core Strategy's Core Policy 47. A limited number of changes have been proposed to reflect national planning policy and to improve clarity. These include:

- A stronger emphasis on considering brownfield opportunities first before considering greenfield sites
- Three kilometres to constitute a 'reasonable distance' from a new site to health and education facilities
- New developments to secure mains connections where practicable

**4.48.** The document also proposes assessment criteria to guide the allocation of three emergency stopping sites as required by the GTAA; and promotes a 'call for sites' to encourage landowners to submit land to the Council for assessment.

## **Evolution of the area without the Wiltshire Gypsies and Travellers Plan**

**4.49.** There continues to be a steady stream of private sites coming forward to meet the needs of Gypsy and Traveller families. Some of these proposed sites are initially refused for site specific reasons, but then allowed on appeal once reasons for refusal are tested and personal circumstances of the applicant are taken into account. Often the lack of an alternative, approved site is part of the discussion.

**4.50.** Without a Wiltshire Gypsies and Travellers Plan this situation is likely to continue with speculative proposals coming forward to meet a definite need but in locations that may be unsustainable and not identified through a Plan.

**4.51.** A review of the site assessment criteria in Core Policy 47 would not be undertaken without this Plan. As explained above, the review is seeking to improve clarity on brownfield site development; what constitutes a reasonable distance to services; and achieving mains connections where practicable in the interest of sustainable development.

**4.52.** Without a plan that meets the evidenced need in the 2020 GTAA there could be a rise in unauthorised encampments on the roadside, and actual homelessness. The lack of emergency stopping sites would not allow the Council to manage unauthorised encampments effectively; or offer travellers temporary accommodation. Having to reside on unauthorised encampments, or having nowhere to go, can seriously affect the mental and physical health of travellers.

**4.53.** Meeting permanent and temporary accommodation need has been identified in various sources, including the Regulation

18 consultation document, as a key issue.

Accommodation, and available land for it, assists travellers in meeting key needs such as access to healthcare and education. Without plan-led development, health and education inequalities that travellers are suffering from are not going to improve in the plan area but are likely to worsen.

**4.54.** The GTAA also identifies teenager's need for accommodation over the first five years as they will become of adult age. Again, there would be a lack of land for new accommodation where they could start living as independent households or a family, if there was no plan with sufficient allocations.

**4.55.** Providing temporary accommodation on emergency stopping sites and allocating permanent sites for new accommodation can also reduce the financial burden for the public directly and indirectly. It may result in lower costs as managing fewer encampments would require fewer police and Council resources; and there could be reduced effects on public and private amenity (for example town centre car parks or private land).



## 5. Task A3 - Key sustainability and environmental issues and problems

### Introduction

#### **The SEA Regulations (Regulation 12(3)) requires consideration of:**

'any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds (a) and the Habitats Directive'

**5.1.** This stage of the scoping report is concerned with identifying the key environmental and sustainability issues for the SA of the Plan to address. These issues may be defined as both problems and opportunities and this leads on from evidence related to the plans, policies and objectives review and baseline information presented in the previous sections. Identifying these issues aids the understanding of matters which need addressing within the Plan.

**5.2.** Many current issues will continue to be identified during the development of the Plan through consultation with the Gypsy and Traveller community, other Wiltshire residents and stakeholders.

### **Key issues and problems**

**5.3.** A brief summary of the main issues that have been identified in the context of planning for travellers in Wiltshire are as follows:

- The evidence confirms that the Wiltshire traveller population, and here ethnic travellers, suffer from health inequalities consistent with the national traveller population. A settled base is key to meet health needs. The Regulation 18 consultation document also identifies education as a key issue in that traveller increasingly seek primary education for their children which is not possible without a settled base.
- There is a concentration of lawful and unauthorised traveller sites in geographical locations in Wiltshire, as shown in Figures 3 and 4 above. This means that accommodation need evidenced in the 2020 GTAA corresponds with this geographical concentration. While in itself not an issue, it has sometimes led to responses from the settled community that certain areas in Wiltshire 'had their fair share' of traveller sites and should therefore not receive new pitches on existing sites, or new sites.
- The GTAA identifies an accommodation need of 132 pitches for gypsies and travellers meeting the planning definition and 79 that do not. There are 12 plots required for travelling showpeople who meet the planning definition over this period. There may also be accommodation need from households that are 'undetermined'. This points to a lack of accommodation that is available to address need over the plan period.
- The lack of available and suitable land in sustainable locations allocated in the development plan to meet identified need can lead to speculative applications on sites travellers acquire on the property market. Not all these sites are acceptable in planning terms and applications are refused and end up at appeal. The lack of site allocations can reduce the effectiveness of the planning system which is meant to be plan-led, and cause frustration for travellers and the settled community alike. The chief future priority highlighted in stakeholder interviews as part of the 2020 GTAA was to address site availability and to improve the availability of education and health services, to improve the lives of Travellers.
- There is currently no provision of pitches for temporary accommodation, in the form of a transit site or emergency stopping site. As outlined above, there are many unauthorised encampments in Wiltshire

each year, with encampments occurring mainly during the summer months. Transit sites or emergency stopping sites can assist in directing travellers to a suitable pitch within the local authority area that is safe and provides basic facilities, for a limited period of time.

**5.4.** Based on the foregoing, the sustainability issues that are particularly relevant to planning for travellers in Wiltshire may be summarised as follows:

- An existing concentration of permanent gypsy and traveller sites in the north, west and south of the county
- Unauthorised and tolerated sites that have no planning permission
- Health inequality issues that mirror national statistics with lack of accommodation being a key underpinning problem
- An identified need for new permanent and temporary pitches and plots for the period 2019-2036, including for children growing up
- Lack of land for new permanent sites in sustainable locations
- Accessibility to services, especially schools and medical facilities
- New sites to have a minimum of basic amenities
- There are no public transit or stopping sites for temporary stay, although some travellers would provide additional pitches on their land for private transit
- Tensions with the settled community

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## 6. Task A4 - Sustainability appraisal framework

### Introduction

6.1. The Sustainability Appraisal Framework consists of sustainability objectives which provide a way in which the effects of the Plan can be described, analysed and compared. While not specifically required by the SEA Regulations, objectives are a recognised way of considering the effects of a plan and comparing the effects of alternatives.

6.2. SA objectives are different in concept and purpose from the objectives of the Plan, although there is likely to be a degree of overlap. The sustainability objectives are designed to be aspirational in nature and to address the full cross-section of sustainability issues, including social, economic and environmental factors laid down by law or policy.

6.3. The sustainability objectives presented in this section are based upon those contained within the Wiltshire Local Plan Review SA Scoping Report which has undergone

consultation with the statutory consultees. However, the objectives have been amended slightly so that they are more relevant to assessing the likely effects of the Plan.

### Establishing sustainability objectives

6.4. Sustainability objectives are set out in Table 11 below, together with the sustainability topics they cover (see following page).

Sustainability topic	Sustainability appraisal objective
Biodiversity	1. Protect and enhance all biodiversity and geological features, avoid irreversible losses and secure measurable net gains for biodiversity
Land and Soil Resources	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings
Water Resources	3. Use and manage water resources in a sustainable manner
Air Quality and Environmental Pollution	4. Improve air quality and reduce all sources of environmental pollution
Climatic Factors	5. Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation)
Energy	6. Increase the proportion of energy generated by renewable and low carbon sources of energy
Historic environment	7. Protect, maintain and enhance the historic environment
Landscapes	8. Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place
Population and housing	9. Provide everyone with the opportunity to live in good quality, affordable accommodation, and ensure an appropriate mix of dwelling sizes, types and tenures
Healthy and inclusive communities	10. Reduce poverty and deprivation and promote more inclusive communities with better services and facilities
Transport	11. Reduce the need to travel and promote more sustainable transport choices
Economy and enterprise	12. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth

**6.5.** A more detailed framework is presented in Appendix B. As the proposed objectives are purposely broad and aspirational in nature, they are supported by 'decision aiding criteria'; these will help to ensure that all the key sustainability issues likely to arise from the Plan are considered during the appraisal. They have been adapted for the purpose of planning for travellers.

### **Predicting and evaluating significant effects**

**6.6.** The sustainability objectives outlined in Table 11 and Appendix B will be used to predict and evaluate the social, environmental and economic effects of options being considered in the Plan, and this will form a key part of the Sustainability Appraisal Report. The

methodology for the prediction and evaluation of effects will be outlined in that report.

**6.7.** Significance of effects will be determined taking account of the criteria for determining likely significance, outlined in Schedule 1 of the SEA Regulations. Significance will also be determined taking account of the established criteria adopted by Wiltshire Council in its Local Plan Sustainability Appraisal Report.

## 7. Task A5 – Consultation requirements

### The SEA Regulations require the following:

‘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 bodies’ (Reg 12(5))

‘Where a consultation body wishes to respond to a consultation under paragraph

- Historic England
- Natural England
- The Environment Agency

**7.2.** Consultation was undertaken between 18th March 2021 and 22nd April 2021 and this report has been updated to take account of the comments received. Comments were received from Natural England and Historic England. The Environment Agency did not respond. Comments can be found in Appendix C.

**7.1.** In accordance with the requirements of the SEA Regulations, the authorities with environmental responsibility, otherwise known as the ‘consultation bodies’, have been consulted on the scope and level of detail contained within this report. These bodies are:

## 8. Next steps

### Remaining Sustainability Appraisal stages

**8.1.** As the draft Plan develops, the information contained within this scoping report will inform the assessment of Plan proposals. A Sustainability Appraisal Report will then be published alongside future drafts of the Plan for public consultation.

### Monitoring

**8.2.** There is a legal requirement to monitor the likely significant effects of the Plan. Monitoring will allow the actual significant effects of implementing the Plan to be tested against those predicted in the sustainability appraisal. It will thus help to ensure that any problems which arise during implementation, whether or not they were foreseen, can be identified and future predictions made more accurately.

**8.3.** Further information regarding future monitoring of significant effects will be outlined in the Sustainability Appraisal Report.



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# **Appendix A - Review of Plans, Programmes, Policies and Sustainability Objectives**

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Source	Summary	Relevance to Gypsies and Travellers Plan
<b>Plans, Programmes, Policies and Sustainability Objectives of relevance to the Wiltshire Gypsies and Travellers Plan</b>		
<b>International</b>		
European Directive 2001/42/EC (The SEA Directive) (2001)	European Directive 2001/42/EC (the SEA Directive) ' <i>on the assessment of the effects of certain plans and programmes on the environment</i> ' requires a formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.	A SEA is required for plans/programmes which are: <ul style="list-style-type: none"> <li>• prepared for...town &amp; country planning or land use and which set the framework for future development consent of projects listed in the EIA Directive; or</li> <li>• have been determined to require an assessment under the Habitats Directive; or</li> <li>which set the framework for future development consent of projects and are likely to have significant environmental effects.</li> </ul>
<b>National</b>		
Town and Country Planning Act 1990 (as subsequently amended)	The Town and Country Planning Act 1990 is an act of the United Kingdom Parliament regulating the development of land in England and Wales. It is a central part of English land law in that it concerns town and country planning in the United Kingdom. Repealed in parts by the Planning and Compensation Act 1991, it is also complemented by the Planning and Compulsory Purchase Act 2004.	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Town and Country Planning Act 1990 contains legislation that allows the local authority to take action to remedy breaches of planning control and this should be taken into account when developing development management style policies within the DPD.
Criminal Justice and Public Order Act 1994	The Act introduced a number of changes to the existing law, most notably in the restriction and reduction of existing rights and in greater penalties for certain "anti-social" behaviours. Part 5 of the Act addresses 'Public Order: Collective Trespass or Nuisance on Land'.	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Criminal Justice and Public Order Act 1994 contains specific legislation regarding enforcement where there has been a breach of planning control with regards traveller sites and this should be taken into account within the DPD.
Housing Act 1996/ Homelessness Act 2002	Section 7 of the Housing Act 1996 sets out Homelessness Legislation. The homelessness legislation places a general duty on housing authorities to ensure that advice and information about homelessness, and preventing homelessness, is available to everyone in their district free of charge. The legislation also requires authorities to assist individuals and families who are homeless or threatened with homelessness and apply for help. In 2002, the Government amended the homelessness legislation through the Homelessness Act 2002	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. These Acts of Parliament contain specific legislation regarding the provision of suitable accommodation for Gypsy and Travellers and this should be taken into account within the DPD.
Human Rights Act 1998	Its aim is to "give further effect" in UK law to the rights contained in the Convention for the Protection of Human Rights and Fundamental Freedoms, but more commonly known as the European Convention on Human Rights. In particular, the Act makes it unlawful for any public body to act in a way which is incompatible with the Convention, unless the wording of any other primary	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Human Rights Act 1998 contains specific legislation that relates to the Gypsy and Traveller community as a minority group and the treatment that all minorities should receive.

	legislation provides no other choice.	
Housing Act 1985 (as amended), in conjunction with the Housing and Planning Act 2016 Section 124	<p>The periodical review of housing needs under section 8 of the Housing Act 1985 is a statutory requirement on local housing authorities. This requires local housing authorities to assess and understand the accommodation needs of people residing or resorting to their district:</p> <p>It states that housing authorities in England have a duty to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.</p>	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Housing Act 1985 contains specific legislation that relates to the carrying out of an accommodation needs assessment for persons residing in caravans, and this should be taken into account when procuring and undertaking the GTAA. – see also draft MHCLG guidance referenced below.
Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans (2015)	The purpose of this Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).	Sets out information to help local planning authorities make well informed and effective local plans. Particularly relevant with regards to any proposed Gypsy and Traveller site allocations.
Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment (2016)	This Historic England Advice Note seeks to provide advice on historic environment considerations as part of the Sustainability Appraisal/Strategic Environmental Assessment process.	Aimed at all relevant local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties. To be considered in undertaking the SA/SEA of this Plan.
Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2015)	The purpose of this Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG).	This document sets out guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. Particularly relevant with regards to any proposed Gypsy and Traveller site allocations.
Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans (2015)	Offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.	This document is intended to offer advice to all those involved in the identification of potential sites for development within a Local Plan, to help ensure that the historic environment plays a positive role in allocating sites for development. Particularly relevant with regards to any proposed Gypsy and Traveller site allocations.
Equalities Act 2010	The primary purpose of the Act is to codify the array of Acts and Regulations, which formed the basis of anti-discrimination law in Great Britain. This legislation has the same goals as the four major EU Equal Treatment Directives, whose provisions it mirrors and implements. It requires equal treatment in access to employment as well as private and public services, regardless of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation.	Policies within the emerging Gypsies and Travellers Plan must comply with all relevant European and national legislation. The Equalities Act 2010 contains specific legislation that relates to the elimination of discrimination, harassment, victimisation and the advancement of equal opportunities. This should be taken into account when developing policies in the Gypsies and Travellers Plan.
Planning Policy for Traveller Sites	This document sets out the Government's planning policy for traveller sites. It	This policy must be taken into account in the preparation of the Wiltshire

(DCLG, 2015)	should be read in conjunction with the National Planning Policy Framework. It provides national policy in terms of plan making and determining planning applications for traveller sites.	Gypsies and Travellers Plan. It is a material consideration in planning decisions.
National Planning Policy Framework (MHCLG, 2019)	<p>Sets out the government's planning policies for England and how these are expected to be applied. It provides a framework for the preparation of local plans, supplementary planning documents and neighbourhood plans. Local Plans should:</p> <ul style="list-style-type: none"> <li>• plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;</li> <li>• be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer-term requirements, and be kept up to date;</li> <li>• be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;</li> <li>• indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;</li> <li>• allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;</li> <li>• identify land where development would be inappropriate, for instance because of its environmental or historic significance; [...]</li> </ul>	<p>Local plans should enable the delivery of sustainable development in accordance with the policies in the Framework. Clear and adequate reasons would be needed to justify a departure from the policies of the Framework.</p> <p>Paragraph 60 of the revised NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.</p> <p>Paragraph 61 then states that 'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'</p>
Review of housing needs for caravans and houseboats: draft guidance (MHCLG, 2016)	Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats.	The guidance explains that amongst other, a specialist survey should be undertaken to establish the accommodation needs of groups such as gypsies and travellers. The guidance states that the local housing authority will need to disseminate the results of the accommodation needs assessment [...] and begin the process of facilitating or providing the necessary provision. This could for example require the identification of land for sites, or the allocation of tenancies in existing properties.
Planning Practice Guidance (MHCLG, 2021)	The PPG is a web-based resource which provides the government's detailed planning guidance for England to be read alongside the NPPF. The PPG covers a variety of topics including (amongst others): conserving and enhancing the environment, housing and development needs assessments, natural environment and strategic environmental assessments.	Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to have regard to advice issued by the Secretary of State in preparing local development documents. Similarly, section 34 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to have regard to any guidance issued by the Secretary of State.
Localism Act (2011)	The aim of the act is to devolve more decision-making powers from central government to councils and neighbourhoods and give local communities more control over housing and planning decisions.	Requires local authorities to work with neighbouring authorities and other prescribed bodies in preparing their development plan documents.
Guidance on Managing Unauthorised Camping (DCLG, 2004)	The guidance's objective is to assist local authorities, police and others to tackle unauthorised camping to minimise the disruption it can cause. It is designed to help strike an appropriate balance between the needs and legitimate expectations of members of the settled community, local businesses and other	The key question is if/how unauthorised encampments will be dealt with in the DPD. This guidance advocates developing an Unauthorised Encampments Strategy. Elements of this guidance may be relevant in developing policies on unauthorised encampments in the Plan, but in



	landowners, and Gypsies and Travellers. It sets out recommended courses of action which all local authorities and police forces should follow to provide an effective response to unauthorised camping in their areas.	part is based on Circular 01/94 which has been abolished. Local authorities, police forces and other bodies should set out an unauthorised encampments strategy and protocol. The strategy must be developed through consultation with all key stakeholders if it is to be effective; and it must seek to balance the rights and responsibilities of the travelling and settled communities. This has been achieved through the Emergency Stopping Sites Strategy approved by Cabinet in July 2018 (see below).
Supplement to 'Managing Unauthorised Camping: A Good Practice Guide (ODPM, 2005)	The supplement provides further guidance on those provisions in the Anti-social Behaviour Act 2003 (amending the Criminal Justice and Public Order Act 1994).	Elements of this guidance may be relevant in developing policies on unauthorised encampments in the Plan, but in part is based on Circular 01/94 which has been abolished.
Guide to effective use of enforcement powers Part 1: Unauthorised encampments (ODPM, 2006)	This document is intended for elected officials and others in the community who have an interest in how unauthorised camping by Gypsies and Travellers is managed in their area and provides information to local authority officers and other landowners on options for dealing with such incidents. It explains the ways in which enforcement action can be made quicker, cheaper and more effective.	This is current and relevant guidance which should be fully considered when developing the Gypsies and Travellers Plan. Elements of this guidance may be relevant in developing policies on unauthorised encampments in the DPD.
Guide to Effective Use of Enforcement Powers – Part 2: Unauthorised Development of Caravan Sites (DCLG, 2007)	This guidance document is intended to inform Planning Enforcement Officers, elected members of local planning authorities, and interested members of the public how the planning enforcement system can be used to prevent the stationing of caravans on land in contravention of planning control.	This is current and relevant guidance which should be fully considered when developing the Gypsies and Travellers Plan. Elements of this guidance may be relevant in developing policies on the unauthorised development of camping sites in the Plan.
Local authorities and Gypsies and Travellers: a guide to responsibilities and powers (DCLG, 2007)	This booklet sets out what needs to be done to ensure more effective enforcement, alongside the provision of more authorised sites.	Important national guidance published by DCLG which should be taken into account in plan development to ensure appropriate provision of Gypsy and Traveller pitches and to ensure strong enforcement is possible
<b>Regional (including relevant plans/policies of neighbouring authorities)</b>		
Bath & North East Somerset Council Adopted Core Strategy 2029 Policy CP11 Gypsies, Travellers and Travelling Showpeople	BANES local plan partial update policy review document states (April 2020, accessed 4 Feb 2021) that the existing policy "represents a comprehensive framework for considering the merits of travellers site proposals. The policy remains relevant and is fit for purpose. Updated evidence on the needs of travelling communities is required and in light of this the policy approach may need to be reviewed (either in a new Local plan or a separate DPD)." However, the policy is not shortlisted for review at this stage.	As the policy review focuses on other areas this document bears no relevance to the Plan. Responses from BANES to the consultation will enable the Council to continue to engage under the Duty to Cooperate regarding cross boundary matters.
Christchurch and East Dorset Local Plan (Part 1 Core Strategy) 2013-2028  Dorset Councils Joint Gypsy and Travellers Site Allocations DPD	The Core Strategy is the document that sets out the planning strategy for Christchurch Borough and East Dorset District for 2013-2028. It contains a criteria-based policy to guide new traveler site proposals (LN5). A joint Site Allocations DPD is under joint preparation by all Dorset authorities. The DPD was progressed during 2011-14 but there is no further information on their website what has happened since 2015 other than:  "The results of this (consultation, sic) and the original site assessment	As the process on the Sites DPD appears to have stalled, responses from Dorset authorities on the Reg18 consultation will be awaited to shape engagement going forward.

	consultation will now be considered together in the light of the 2017 GTAA to draw up a list of preferred sites. These will be published for a further round of consultation in a "Pre-Submission" Plan."	
Cotswold AONB Management Plan 2018 - 2023	The Management Plan sets out the vision, outcomes, ambitions and policies to guide the management of the AONB for the period 2018-2023. The Management Plan is a key mechanism for achieving the purposes of: (i) conserving and enhancing the natural beauty of the AONB; and (ii) increasing the understanding and enjoyment of the AONB's special qualities. While having regard to these purposes, it seeks to foster the economic and social well-being of local communities within the AONB. It also seeks to foster a more consistent and coordinated approach across this administratively complex AONB in order to achieve these purposes more effectively.	Relevant to any potential Plan policies and/or site allocations that could impact on this AONB.
Cranborne Chase Partnership Plan 2019 - 2024	Following consultation with local communities, public bodies and agencies with an interest in the area, the Plan presents the special qualities and features of the AONB and determines what actions are required to ensure their conservation and enhancement. It explains the significance of this AONB and describes its outstanding landscapes, focusing on conserving and enhancing them, sustaining living and working landscapes, and the special landscapes to enjoy.	Relevant to any potential Plan policies and/or site allocations that could impact on this AONB.
Mendip District Council Local Plan 2006-2029	The adopted Mendip DC Local Plan 2006-29 states that proposals submitted to the Council will be assessed against the criteria within Development Policy 15 as well as the content of "Planning Policy for Traveller Sites". A dedicated Site Allocations DPD will be prepared but there is no information on this document on the DC's website. Instead the MENDIP DISTRICT LOCAL PLAN 2006-2029 PART II SITES AND POLICIES proposed main modifications allocates a traveler site at Moreland, Glastonbury, but the plan remains under examination.	The Plan does not identify cross boundary issues that will need to be addressed but responses from Mendip District Council on the Reg18 consultation will be awaited to shape engagement going forward.  Mendip DC have published a Community Land Trust <u>Leaflet</u> for travelers which could assist in identifying alternative products for site delivery in Wiltshire.
New Forest District Council Local Plan Part 1 2016-2036	The adopted Local Plan Part 1 (Strategy) identifies a small additional pitch need for the district for travelers and travelling showpeople. The Plan states that Part 2 of the Plan Review will deal with any outstanding need.	The Plan does not identify cross boundary issues that will need to be addressed but responses to the Reg18 consultation will be awaited to shape engagement going forward.
New Forest National Park Authority 2016-2036 Local Plan	The adopted 2016-36 Local Plan in Policy SP33: Gypsies, travellers and travelling showpeople allocates land within the curtilage of the existing gypsy site at 'Forest View' in Landford for an additional permanent gypsy and traveller pitch (a net gain of one pitch). Residual need identified could not be met in the Plan because the NPA could not source any land for this and owns no land in the Plan area as stated in the supporting text to the policy.	The Landford site falls into Wiltshire but remains under the planning jurisdiction of the NPA. The evidence underpinning the Local Plan stems from the 2017 joint Hampshire authorities GTAA so this may be reviewed during the plan preparation. There was a small need that has now been met through planning permission at the Landford site. Travelling Showpeople need is viewed to be met through a criteria-based policy and was seconded by EIP Inspector.
New Forest National Park Recreation Management Strategy 2010 – 2030	The Recreation Management Strategy sets out the strategic direction for the management of outdoor recreation in the New Forest National Park from 2010 – 2030. The strategy seeks to guide and influence recreation and spatial planning policy and implementation across the whole of the National Park and adjoining	The Gypsies and Travellers Plan could potentially impact on the New Forest through policies and site allocations that may increase the number of visitors to the national park.

	areas.	
North Wessex Downs AONB Management Plan 2019 - 2024	The North Wessex Downs AONB Management Plan presents objectives and policies that partners can apply to help conserve and enhance this nationally important landscape. The Plan also contains priorities that the North Wessex Downs team intends to lead or carry out with others.	Relevant to any potential Plan policies and/or site allocations that could impact on this AONB.
Partnership Plan for the New Forest National Park 2015 – 2020	All English national parks are required to publish a management plan or partnership plan for their area and to update them every five years. It is the overarching strategy document that guides and monitors the work of all those organisations who have a statutory responsibility for delivering the two statutory national park purposes: 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park 2. To promote opportunities for the understanding and enjoyment of the special qualities of the area by the public	The Gypsies and Travellers Plan could potentially impact on the New Forest through policies and site allocations that may increase the number of visitors to the national park.
North Dorset	See Dorset above – no progress on dedicated Sites DPD	As the process on the DPD appears to have stalled, responses from Dorset authorities on the Reg18 consultation will be awaited to shape engagement going forward.
South Gloucestershire Core Strategy 2006-2027	The adopted Core Strategy has a plan period up to 2027 and safeguards existing traveler sites (including travelling showpeople) and sets criteria for new proposals. It does not allocate additional sites for growth. The Local Plan 2020 Issues and Approaches consultation (live until March 2021) identifies that there's been a historic unmet need in the district.	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. South Glos response to the Reg18 consultation will be awaited to shape engagement going forward.
South Somerset Local Plan 2006-2028	Adopted South Somerset Local Plan 2006-28 contains Policy HG7. The Plan is based on a 2011 GTAA. A 2013 refresh provides additional requirements but the Plan states that they have been met and exceeded. The Plan states that proposals should meet site criteria in the Policy. The Council is undertaking a review of the Local Plan. The Local Plan Review Preferred Options has been through the consultation stage. The Somerset authorities have agreed to jointly commission a new County-wide GTAA. The new assessment will inform the policy at the next stage of the Local Plan Review.	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. South Somerset's response to the Reg18 consultation will be awaited to shape engagement going forward.
Swindon Borough Local Plan 2026	Policy HA8 in the adopted Local Plan states: Provision for 17 additional gypsy and traveller residential pitches and one travelling showpeople site (in accordance with the latest GTAA) will be made over the plan period. The location(s) of this additional requirement will be identified in a Site Allocation Development Plan Document. The latest LDS now assigns site allocations for travelers to the Local Plan Review 2016-36.	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. Swindon's response to the Reg18 consultation will be awaited to shape engagement going forward.
Test Valley Local Plan 2014-2029	The adopted Local Plan 2014-29 contains a criteria-based policy COM13 for planning applications for traveler sites. The plan states that it is expected that identified need can be met through planning permissions but that a separate site	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. Test Valley's response to the Reg18 consultation will be awaited to shape

	<p>allocations DPD shall be prepared.</p> <p>Consultation on a Reg18 document was undertaken in February 2015.</p> <p>The adopted LDS (2020) states that most recently, an updated Scoping Report (as the first stage in the Sustainability Appraisal process) was approved in 2018. The evidence base for gypsies, travellers and travelling showpeople is being reviewed and considered in the light of case law. Depending upon the outcome of this review, a decision will be made in due course as to whether to prepare a separate Gypsy and Traveller DPD, or to include provision for this community, within the next Local Plan.</p>	engagement going forward.
Vale of White Horse District Council Local Plan Part 2 2031	The 2031 Local Plan states: Alongside the preparation of the Part 2 plan, the council produced a joint Gypsy, Traveller and Travelling Show People Accommodation Assessment with Cherwell District Council, Oxford City Council and South Oxfordshire District Council. The new assessment identifies that only one new pitch is required in the later part of the plan period (2027-2031). No allocations for gypsy, traveller and travelling show people are therefore proposed in the Part 2 plan. Applications for new pitches will be considered alongside the requirements of Core Policy 27: Meeting the Needs of Gypsies, Travellers and Travelling Show People.	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. Vale of White Horse District Council's response to the Reg18 consultation will be awaited to shape engagement going forward.
West Berkshire Core Strategy 2006-2026	Policy CS7 in the adopted Core Strategy (2006-2026) states: To meet the identified need for Gypsies, Travellers and Travelling Showpeople (56) pitches within the District, the Council will make appropriate provision through the identification of sites within the Site Allocations and Delivery DPD. The requirement for transit sites will be addressed through the same DPD. The Local Plan Review 2020 -2037: Emerging Draft proposes a traveller site and a showpeople site allocation.	The adopted Plan does not identify cross boundary issues that will need to be addressed nor does the current consultation document. West Berkshire response to the Reg18 consultation will be awaited to shape engagement going forward.
<b>Local</b>		
Wiltshire Core Strategy Core Policy 47 (Wiltshire Council, 2015)	This policy makes provision to help meet the accommodation needs of the Gypsy and Traveller community and travelling showpeople, who normally reside in or travel through the county. Core Policy 47 introduces a set of criteria which define broad locations where sites would be appropriate and against which potential sites will be tested and identifies a requirement for new pitches to 2021. The criteria have regard to local amenity, access to facilities and impact on the landscape in a similar way to policies for general housing.	Core Policy 47 forms the overarching policy regarding Gypsy and Travellers in Wiltshire. The Core Strategy was adopted in January 2015. The new Plan will review the policy and allocate land to meet identified accommodation need in the 2020 GTAA. This is stated in the Regulation 18 consultation document on the draft Gypsies and Travellers Plan.
Gypsy and Traveller Accommodation Assessment (ORS, June 2020)	Identifies the permanent and temporary accommodation assessments for travelers, including travelling showpeople, for 2019-36.	Pitch and plot targets expressed in the study form the basis for the new Plan, as per Planning Policy for Traveller Sites.
Wiltshire Council Emergency Stopping Places Strategy (Wiltshire Council, 2018)	This strategy builds on the recommendations in the 2014 Gypsy and Traveller Accommodation Assessment to build three emergency stopping sites in the county. It identifies policy and legislation affecting trespassing/encampments; number of unauthorised encampments; criteria for site selection, and other. The Strategy was considered in the 2020 GTAA and its recommendations have been reiterated in that document as to where sites should be provided in	The ESP Strategy site selection criteria have been transposed into the Reg18 consultation document and will continue to inform ESP site selection. The general strategy to provide three sites in the north, west and south of the county is also proposed to be maintained.

	Wiltshire.	
Planning for Wiltshire's Gypsy and Traveller Communities Consultation Document (Wiltshire Council, 2021)	This consultation seeks views to inform the content of the Plan which will address the accommodation needs of the Gypsy and Traveller communities. The Plan will identify accommodation needs for travelers to 2036 and identify sites and broad locations for growth to meet permanent and temporary accommodation needs. It will review Core Policy 47 of the Wiltshire Core Strategy.	Consultation responses will inform the content of the Plan, and a Regulation 19 draft will be consulted on in late 2021.
Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025	The Strategy's aim is to tackle inequalities experienced by the Gypsy, Roma, Traveller and Boater communities of Wiltshire. It identifies six key priorities and actions and partners to deliver against these priorities.	The Strategy can assist in identifying the sites and policies that will assist in meeting identified accommodation need in the right locations.
Health Needs Assessment of the Gypsy, Roma, Traveller and Boater population in Wiltshire (Wiltshire Council, 2019)	The first Health Needs Assessment of the Gypsy, Roma, Traveller and Boater population in Wiltshire provides the most current assessment of the health needs of these communities and identify the best evidenced interventions to meet these needs. This has allowed the development of the Wiltshire Gypsy, Roma, Traveller and Boater Strategy 2020-2025 using the most up to date information and evidence.	The assessment provides useful background information on health inequalities and can influence land use planning in terms of where new permanent and temporary accommodation should be provided to assist in addressing health inequalities.
Wiltshire Countryside Access Improvement Plan 2015 - 2025	The Plan sets out the actions Wiltshire Council will take to manage, improve and promote Wiltshire's countryside access network (CAN). The CAN includes: public rights of way in both rural and urban areas (footpaths, bridleways, restricted byways and byways open to all traffic); permissive paths; cycleways which are not adjacent to roads; canal towpaths; country parks; town parks; forests with public access (generally managed by the Forestry Commission); Access Land; and stretches of road and pavements or joint footway/cycleways which link the above together.	The allocation, intensification and/or extension of sites in the Gypsies and Travellers Plan has the potential to impact Wiltshire's countryside access network and this network will also allow residents access to local services and facilities and opportunities for healthy exercise.
Wiltshire Council Level 1 Strategic Flood Risk Assessment (JBA Consulting, May 2019)	The SFRA forms part of a comprehensive and robust evidence base for the Local Plan which will set out a vision and framework for development in Wiltshire up to 2036 and used to guide the sequential test and decisions on the location of future development. The SFRA will also be used to assess planning applications, and flood risk mapping information will be made available for developers for carrying out flood risk assessments.	The SFRA forms guidance aimed at both planners and developers. The guidance should be read in conjunction with the NPPF and flood risk guidance from the Environment Agency. The guidance addresses: requirements for development in each of the Flood Zones, making development safe, river restoration and enhancement as part of development, dealing with existing watercourses and assets, developer contributions to flood risk improvements, dealing with surface water runoff and drainage, wastewater, water quality and biodiversity.

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# **Appendix B - Sustainability Appraisal Framework**

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<b>Sustainability Topic</b>	<b>Sustainability Appraisal objective</b>	<b>Decision aiding questions. Will the policy or site ...?</b>
Biodiversity	1. Protect and enhance all biodiversity and geological features and avoid irreversible losses.	<ol style="list-style-type: none"> <li>1. Avoid potential adverse impacts of development on local biodiversity and geodiversity and secure measurable net gains for biodiversity?</li> <li>2. Protect and enhance designated and non-designated sites, priority species and habitats and protected species?</li> <li>3. Ensure that all new developments protect Local Geological Sites (LGSs) from development?</li> </ol>
Land and Soil Resources	2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings	<ol style="list-style-type: none"> <li>1. Ensure development maximises the efficient use of land?</li> <li>2. Maximise the reuse of brownfield/Previously Developed Land?</li> <li>3. Encourage remediation of contaminated land? If so, would this lead to issues of viability and deliverability?</li> <li>4. Result in the permanent loss of the Best and Most Versatile Agricultural land (Grades 1, 2, 3a)?</li> <li>5. Lead to the sterilisation of viable mineral resources? If so, is there potential to extract the mineral resource as part of the development?</li> </ol>
Water Resources	3. Use and manage water resources in a sustainable manner	<ol style="list-style-type: none"> <li>1. Protect surface, ground and drinking water quantity/quality?</li> <li>2. Direct development to sites where adequate water supply, foul drainage, sewage treatment facilities and surface water drainage is available?</li> </ol>
Air Quality and Environmental Pollution	4. Improve air quality and reduce all sources of environmental pollution	<ol style="list-style-type: none"> <li>1. Minimise and, where possible, improve on unacceptable levels of noise, light pollution, odour, and vibration?</li> <li>2. Reduce impacts on, and work towards improving and locating sensitive development away from areas likely to experience poorer air quality due to high levels of traffic and poor air dispersal?</li> <li>3. Lie within a consultation risk zone for a major hazard site or hazardous installation?</li> </ol>
Climatic Factors	5. Minimise our impacts on climate change (mitigation) and reduce our vulnerability to future climate change effects (adaptation)	<ol style="list-style-type: none"> <li>1. Maximise the potential for renewable energy opportunities?</li> <li>2. Avoid vulnerable development in areas at risk of flooding through the application of the sequential test/exceptions test?</li> <li>3. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere?</li> <li>4. Promote and deliver resilient development that is capable of adapting to the predicted effects of climate change, including increasing temperatures and rainfall, through design e.g. rainwater harvesting, Sustainable Drainage Systems, permeable paving etc.</li> </ol>
Energy	6. Increase the proportion of energy generated by renewable and low carbon sources of energy	<ol style="list-style-type: none"> <li>1. Support the development of renewable and low carbon sources of energy?</li> <li>2. Be capable of connecting to the local Grid without the need for further investment?</li> <li>3. Deliver high-quality development that maximises the use of sustainable construction materials?</li> <li>4. Deliver energy efficient development that exceeds the minimum requirements set by Building Regulations?</li> </ol>



<b>Sustainability Topic</b>	<b>Sustainability Appraisal objective</b>	<b>Decision aiding questions. Will the policy or site ...?</b>
Historic Environment	7. Protect, maintain and enhance the historic environment	<ol style="list-style-type: none"> <li>1. Conserve and enhance World Heritage Sites, Scheduled Monuments, Listed Buildings, the character and appearance of Conservation Areas, Historic Parks &amp; Gardens, sites of archaeological interest and, where appropriate, undesignated heritage assets and their settings?</li> <li>2. Maintain and enhance the character and distinctiveness of settlements through high quality and appropriate design, taking into account, where necessary, the management objectives of Conservation Areas?</li> </ol>
Landscapes	8. Conserve and enhance the character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place	<ol style="list-style-type: none"> <li>1. Minimise impact on and, where appropriate, conserve and enhance nationally designated landscapes e.g. National Parks and AONBs, and their settings?</li> <li>2. Minimise impact on, and enhance, locally valued landscapes through high quality, inclusive design of buildings and the public realm?</li> <li>3. Protect and enhance rights of way, public open space and common land?</li> </ol>
Population and Housing	9. Provide everyone with the opportunity to live in good quality, affordable accommodation, and ensure an appropriate mix of dwelling sizes, types and tenures	<ol style="list-style-type: none"> <li>1. Provide an appropriate supply of affordable accommodation?</li> <li>2. Support the provision of a range of accommodation types and sizes to meet the needs of all sectors of the Gypsy and Traveller community?</li> </ol>
Healthy and Inclusive communities	10. Reduce poverty and deprivation and promote more inclusive communities with better services and facilities	<ol style="list-style-type: none"> <li>1. Be accessible to educational, health, amenity greenspace, community and town centre facilities?</li> <li>2. Reduce the adverse impacts associated with rural isolation through better connectivity to affordable local services?</li> </ol>
Transport	11. Reduce the need to travel and promote more sustainable transport choices	<ol style="list-style-type: none"> <li>1. Provide suitable access to a highway of sufficient width and capacity?</li> <li>2. Promote developments in accessible locations that reduce the need to travel and reduce reliance on the private car?</li> <li>3. Make efficient use of existing sustainable transport infrastructure, including walking, cycling and public transport?</li> </ol>
Economy and Enterprise	12. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth	<ol style="list-style-type: none"> <li>1. Support the vitality and viability of the local economy?</li> <li>2. Allow good access for the Gypsy and Traveller community to nearby employment areas and local jobs?</li> </ol>



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# **Appendix C - Consultation Responses**

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## Historic England

**Subject:** RE: Wiltshire Gypsies and Travellers Plan - Consultation on Draft Sustainability Appraisal Scoping Report ending 22nd April 2021

**Date:** 22 April 2021 14:23:52

Attachments: image001.png image002.png

thank you for consulting Historic England on the scope of your proposed SA. Apologies for the delay in my response.

As you know we have previously advised on Wiltshire Council's Sustainability Appraisals, most recently in relation to the Wiltshire LP Review; so to avoid undue repetition could I please refer you to those comments, and in particular to our guidance on how best an SA might consider and respond to the historic environment. <https://historicengland.org.uk/images-books/publications/sustainabilityappraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmentalassessment>

I note the proposed SA for this document contrasts with the form and scope of the aforementioned LP SA, and this G&T Plan SA could benefit from considering the SA drafted for the LP to ensure good practice is employed. For example, this SA appears not to include reference to relevant historic environment plans, programmes and policies nor to the related issues and challenges facing Wiltshire's heritage e.g. the pressure from encroachment on its sensitive historic landscapes. Likewise, the heritage objective and decision making questions would benefit from being consistent with the LP SA.

Sincere regards

Historic Environment Planning Advisor South West.  
Regions Group  
Historic England, 1st Floor, Fermentation North, Finzels Reach, Hawkins Lane, Bristol BS1 6LQ

We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops. Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

## **Natural England**

Date: 09 April 2021  
Our ref: 347096

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Park Electra Way Crewe Cheshire  
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T 0300 060 3900

**Planning consultation:** Wiltshire Local Plan - Wiltshire Gypsies and Travellers Plan - Consultation on Draft Sustainability Appraisal Scoping Report

Thank you for your consultation on the above dated 18 March 2021

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **TASK A1 - IDENTIFYING OTHER PLANS, POLICIES AND SUSTAINABILITY OBJECTIVES**

Natural England is broadly satisfied with the Review of Plans, Programmes, Policies and Sustainability Objectives identified in Appendix A. However, we note there is no reference to New Forest National Park Recreation Management Strategy. Additionally we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- River basin management plans
- AONB and National Park management plans.
- Relevant landscape plans and strategies.

### **TASK A2: COLLECTION OF BASELINE INFORMATION**

No comment

### **TASK A3 - KEY SUSTAINABILITY AND ENVIRONMENTAL ISSUES AND PROBLEMS**

We note that there is no reference to the restoration or enhancement of biodiversity, with the issues referring only to avoiding damage. We recommend that the restoration or enhancement of biodiversity is included in line with the National Planning Policy Framework.

We note that there is no specific reference to the loss of Best and Most Versatile agricultural land.

We note that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue.

In direct relation to the aforementioned improving access to nature we also note that there is no reference to the New Forest.

### **TASK A4 - SUSTAINABILITY APPRAISAL FRAMEWORK**

As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

**Biodiversity:**

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

**Landscape:**

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

**Green infrastructure:**

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

We acknowledge that our interests in the natural environment have been covered by this section however in **Table 11: Sustainability topics and SA objectives** we note that biodiversity net gain has not been included under Biodiversity. Natural England would like to emphasise the importance of the net gain approach with the following advice:

**Biodiversity Net Gain**

Government policy is progressing to reverse the trend of biodiversity decline, which has continued to occur despite planning policy aimed towards no residual loss in biodiversity.

This includes the revised NPPF which sees a strengthening of provision for net gain through development. Defra have also consulted on updating planning requirements to make it mandatory. This is following the publishing of Defra's 25 Year Environmental Plan, in which net gain through development is the first key objective.

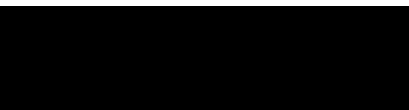
Natural England therefore recommend plans and policies seek to achieve biodiversity net gain, over and above residual losses which should be accounted for and addressed.

You may wish to consider the use of the Defra Biodiversity Metric 2, which is a clear and methodical calculation for net gain in biodiversity for individual planning proposals. The metric has been updated to include a wider range of habitat types and incorporate wider benefits of Green Infrastructure. The final version of the metric is due to be published in December 2020.

Please note that Biodiversity Metric 3.0 is due to be published in Spring 2021, which will supersede Biodiversity Metric 2.0. We advise that the policy is updated accordingly and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric, to be in line with para 174(b) of the NPPF which requires biodiversity net gains to be measurable.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me directly. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).



# **Gypsies And Travellers Plan (2019 - 2036) Sustainability Appraisal (Incorporating Strategic Environmental Assessment) Scoping Report**



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