

December 2025

Our Ref: JG.25

Development Management,
Wiltshire Council,
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Mx/ Madam/ Sir,

Application for the change of use of land to provide a Gypsy / Traveller site and associated works including 1 no. mobile home, 1 no. touring caravan and demolition of stables and construction of replacement building (day room /utility room and PV installation) partially retrospective.

Land SW of B4069, The Banks, Lyneham, Chippenham SN15 4EZ (x:400514, y:179901)

1. Please find enclosed an application on behalf of Mr J Grisley. The purpose of this covering letter is to provide a description and justification of the proposals.
 2. This application comprises:
 - JG.01 - Application Form and ownership certificate
 - JG.02 - Planning Statement (this document)
 - JG.03 - SLP
 - JG.04 - Proposed Site Layout
 - JG.05 - Elevations and Floor Plans
 - JG.06 - Landscape Design Statement
 - JG.07 - Cil 1 form
 - JG.08 - Existing Site Layout
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Site description

3. The application site comprises an irregular parcel of land, measuring c.950m². The site is located to the southwest of the B4069, c. 0.5 mile north west of Lyneham.
4. On site is an existing stable block and area of hardstanding. The site is bounded by hedgerows and trees on all sides and is well screened from the road. Beyond which lie agricultural fields.
5. The site is located in Floodzone 1. It is situated in the open countryside for planning purposes.

The application proposal

Gypsy/Traveller pitches

6. The proposal is for a Gypsy / Traveller site comprising 1 no. mobile home, 1 touring caravan and dayroom / utility / storage building
7. The pitch will be occupied by Gypsies/Travellers who fulfil the definition of Gypsies and Travellers in *Annex one of Planning Policy for Traveller Sites* (PPTS 2024).

Access

8. There is an existing access onto the B4069.

Landscaping

9. The site is bounded on all sides by mature trees and hedgerows. However, additional landscaping proposals have been included to safeguard the character of the local countryside, provide additional screening, enhance biodiversity and to ensure a high level of amenity for the residents.
10. The proposal includes a Landscape Design Statement (JG.06), which sets out the landscaping scheme and assesses landscape impact.

Relevant development plan policy & other material considerations

The adopted plan

11. The Wiltshire Local Plan is comprised of saved policies from the District Local Plans and Wiltshire Core Strategy, adopted 20th January 2015
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Emerging Plan

12. Emerging policy includes Wiltshire Gypsy and Traveller Development Plan Document (DPD) pre-submission draft (Regulation 19), which was published in August 2024.
13. The emerging document puts forward allocations for 84 pitches.

Unmet need for sites

14. The most up-to-date assessment of Gypsy Traveller accommodation need in Wiltshire is the June 2024 GTAA, which identified a significant level of unmet need in the area.
15. The assessment was published prior to the amendments to the PPTS definition of Gypsy and Traveller in December 2024. As such the separation of those that meet the definition and those that do not is out of date.
16. The assessment identifies a total unmet need of 289 pitches for the plan period 2024 - 2038 (those meeting: 182, and those not meeting: 70 the definition and unknown: 37).
17. It is important to note that the changes to the definition of Gypsy / Traveller in Annex 1 of PPTS, are likely to result in an increase in identified need across the county, particularly in areas where a large proportion of the Gypsy / Traveller community currently resides in Bricks and Mortar.

Planning Policy for Traveller Sites (PPTS 2024)

18. PPTS states that its overarching aim is to: *"ensure the fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community"*. In order to do this PPTS sets out a number of aims including:
 - *to promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites*
 - *to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply*
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- *to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure*

19. In our view, the following policies are also of relevance:

- Policy B: Planning for Traveller sites
- Policy C: Sites in rural areas and the countryside
- Policy H: Determining planning applications for Traveller sites

Human Rights Act 1998

20. Article 8 of the Human Rights Act 1998 is of relevance to the case as failure to grant permission would constitute an interference with home and family life.

THE MAIN ISSUES

Introduction

21. Our position is that the proposal is consistent with the development plan and, as such, can be granted consent accordingly.
22. If the LPA is in disagreement on this matter, the significant level of unmet need in the area and the personal circumstances of the applicant are material considerations which weigh significantly in favour of the application.

Traveller-specific policies

23. Wiltshire Core Policy 47 *Meeting the needs of Gypsies and Travellers* sets out criteria against which proposals for new Gypsy / Traveller pitches should be assessed. The criteria are reproduced below (in italics), and annotated with comments in relation to the application site:

i. No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable.

There are no significant barriers to development. The site is in floodzone 1 and located adjacent open fields.

ii It is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users.

There is an existing vehicular access to the site.

iii. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal.

The site complies with this criterion.

iv. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas.

There is adequate space within the site for informal amenity space and play areas. Designated parking has been included in the proposed site layout.

v. It is located in or near to existing settlements within reasonable distance of a range of local services and community facilities, in particular schools and essential health services.

The site is located close to the settlement of Lyneham which provides a good range of services and community facilities. Royal Wotton Bassett lies c. 5 miles (by road) to the north west.

vi. It will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is sensitively designed to mitigate any impact on its surroundings.

The site layout has been carefully designed and includes landscaping proposals to ensure the character and appearance of the landscape is protected. Given the site's location and careful design, there is no reason to expect that the proposal would impact the amenity of neighbouring properties.

vii Adequate levels of privacy should be provided for occupiers.

The proposal ensures a high level of amenity for the residents and complies with this requirement.

viii. Development of the site should be appropriate to the scale and character of its surroundings and existing nearby settlements.

The development is proportionate to its surroundings.

ix. The site should not compromise a nationally or internationally recognised designation nor have the potential for adverse effects on river quality, biodiversity or archaeology.

The application does not adversely impact any nationally or internationally recognised designations.

24. Given the above, we are of the view that the proposal meets the development plan requirements.

Sustainability in the round

25. The NPPF and PPTS are clear that the correct approach to sustainability should encompass environmental, social and economic issues. As such

the social and economic benefits of providing a permanent base for the applicants must also be taken into the balance when assessing the sustainability of the proposal.

Emerging Policy

26. The emerging Gypsy and Traveller DPD sets out new criteria based policy against which windfall sites can be assessed. This sets out slightly more onerous requirements than the extant Core Policy 47, but none the less covers broadly similar issues.
27. Given the above and that DPD has not yet gone to examination the criteria have not been directly addressed here, however, it is considered that the proposal could meet them.

Material Considerations

Unmet need for Traveller sites

28. As set out above, there is a significant unmet need for sites in Wiltshire. This is a factor that should be afforded significant weight.
29. The most recent GTAA refers to the previous PPTS definition and as such even though it has only recently been compiled, it may be considered out of date. However, given the amended definition now includes those with a 'cultural preference' it is likely that the combined total of identified unmet need provides an approximate guide.
30. It is also important to note that, PPTS 2024 states that:
- 28. If a local planning authority cannot demonstrate an up-to-date 5 year supply of deliverable sites, the provisions in paragraph 11(d) of the National Planning Policy Framework apply.*
31. Given that there is a significant level of identified unmet need that the Gypsy and Traveller DPD is still emerging, it is likely that there is currently not an up-to-date 5 year supply of deliverable sites. If that is the case then the tilted balance is in play.

Lack of alternative sites

32. In R (on the application of Doncaster Metropolitan Borough Council) v First Secretary of State and another¹ Bartlett J agreed with the approach of a planning inspector who found that:
- ...the absence of any alternative, available, affordable, acceptable and suitable land to which the site occupants could move has to be afforded considerable weight in favour of the development.*
33. In this case there is an acknowledged lack of alternative sites in Wiltshire and this attracts significant weight in favour of the proposal.
34. The emerging DPD sets out at paragraph 1.11 as follows:
- There has been an open call for sites during the preparation of the Plan, and this has been supplemented by a targeted approach to landowners requesting them to put forward their land for consideration in 2023. Despite these efforts only limited sites have*

¹ [2007] EWHC 1034 (Admin)

been put forward by landowners for consideration through the Plan

Personal Circumstances

- 35. The Traveller status and personal circumstances of the applicant are set out in a separate confidential document (CONF01).
- 36. Personal circumstances are a material consideration in favour of the application and need to be assessed in the context of the Human Rights Act.

Conclusions

- 37. In our view the proposed Gypsy / Traveller site is compliant with the requirements of the development plan and as such permission can be granted.
- 38. Please do not hesitate to get in touch should you require any further information.

Yours faithfully,

Ruth Munns

Planning Consultant
Gaia Planning
Ruth@gaiaplanning.co.uk