

RUNNYMEDE BOROUGH COUNCIL

**RUNNYMEDE PITCH AND PLOT ALLOCATION SCHEME FOR
GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE
SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

**TOWN & COUNTRY PLANNING (LOCAL PLANNING)(ENGLAND)
REGULATIONS 2012**

REGULATION 12 STATEMENT OF CONSULTATION

May 2024

- 1.1 This statement sets out the work involved in preparing the draft Runnymede Borough Council Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document (SPD) for public consultation and how the Council has engaged various stakeholders during the course of its preparation.
- 1.2 The Town & County Planning (Local Planning) (England) Regulations 2012 ('the Regulations') set out in Regulation 12 that before a local planning authority adopts a Supplementary Planning Document (SPD), they must prepare a statement (Statement of Consultation) setting out:
 - i) The persons the local planning authority consulted when preparing the SPD;
 - ii) A summary of the main issues raised by those persons; and
 - iii) How those issues have been addressed in preparing the draft SPD.
- 1.3 A list of all those persons who will be consulted on the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD is set out in Appendix A (it should be noted that Appendix A lists the individuals, companies and other groups registered on the Council's Planning Policy database in May 2024. It is possible that there may be minor changes in the list of people registered between this time and the adoption of the SPD).
- 1.4 To help shape the contents of the SPD, the draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople was also published for an initial period of public consultation between 15th October and 26th November 2021. A summary of the comments made during this period of consultation are set out in Appendix B with a response provided to each to confirm where the comment had been addressed in the May 2024 version of the draft SPD (if applicable).
- 1.5 Regulation 12 also requires that for the purpose of seeking representations, copies of the Statement of Consultation must be made available with the SPD with details of:
 - i) The date by which representations must be made; and
 - ii) The address to which they must be sent.

Next steps

- 1.6 The Council is now proposing to hold a further round of public consultation on the draft SPD for a 6 week period from Wednesday 5th June until Wednesday 17th July 2024. The representations which are received during the period of consultation will be summarised in an updated version of this Statement and officer responses setting out how each comment has been taken into account will be inserted into Appendix B. The minimum period for consultation on an

SPD as set out in the Regulations and the Council's 2021 Statement of Community Involvement is four weeks, but an additional two weeks is proposed to be added to allow more time for views to be prepared and submitted.

- 1.7 The consultation material will be promoted in a number of ways, and the Council will be proactive in disseminating details of the consultation to the local travelling community and the groups who represent them.
- 1.8 The date by which representations must be made; and the address to which they must be sent is included in Appendix C of this document and will also be made available on the Council's website and in the emails and letters that the Council sends out at the start of the consultation period alerting people to the consultation and inviting interested parties to make comments.
- 1.9 During the consultation, officers will be available to answer any queries, with contact details provided on the Council's website and in the letters which are sent out and which will invite representations at the start of the process.
- 1.10 Following the consultation, all comments received will be carefully reviewed and any amendments will be made to the draft SPD. A final version of the SPD will be prepared and presented to the Planning Committee for consideration to adopt it. It is anticipated that the SPD will be presented at Committee in Autumn 2024, although this is subject to the volume and nature of comments received during public consultation. A further version of this Statement of Consultation will be prepared at adoption stage, as required by the Regulations.
- 1.11 The final Statement of Consultation will be published alongside the SPD for adoption, in line with the Regulations.

Appendix A - List of Persons Consulted on the draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD

As well as the organisations listed below a further 479 private individuals on the Planning Policy consultation database were consulted.

398 Air Cadets	Chertsey South Residents Association	Hodders
ACS Egham	Chobham Commons Preservation Committee	Hogan Lovells
Highways England	Chobham Parish Council	Home Builders Federation
Adams Group Real Estate Ltd	Christian Science Society Egham	Homes England
Addlestone Baptist Church	City Planning	House Builders Federation
Addlestone Community Centre	Civil Aviation Authority	Hythe Community Church
Addlestone Historical Society	CMA Planning	Hythe Community Church Pentecostal
Addlestone Salvation Army	Community Life	Iceni Projects
Affinity Water	CPRE Surrey	International Community Church
All Saints New Haw	CT Planning	IQ Planning Consultants
Andrew Black Consulting	Darley Dene Primary School	Jaspar Group
AR Planning	Department of Education [DoE]	John Andrews Associates
ARUP	Devine Homes	JSA Architects
Aston Mead Land & Planning	DHA Planning	Just a helping hand
Avison Young	Dhammakaya International Society Of The United Kingdom	Kennedy Trust
Barton Willmore LLP	Disability Empowerment Network Surrey	Kevin Scott Consultancy
Basingstoke Canal Society	DP9 Ltd	Kings Church Addlestone
Beacon Church	DPDS Consulting	Kinwell Property Investments Ltd
Bellway Homes	DWD LLP	Laleham Reach Residents Association
Berkeley Group	Egham Chamber of Commerce	Leaders Romans Group
Bigbury Neighbourhood Plan Steering Group	Egham Residents Association	Lichfields
Bishopsgate Primary School	Egham Women's Institute	London Borough of Hillingdon
Bisley Parish Council	Elmbridge Borough Council	London Borough of Hounslow
Blue Cedar Homes	Englefield Green Neighbourhood Forum	London Borough of Kingston Upon Thames

Blue Crest land	West End Parish Council	London Borough of Richmond Upon Thames
Bluestone Planning	Englefield Green Village Resident's Association	London Plan Team/Greater London Authority [GLA]
Boyer Planning	Enterprise M3 LEP	Longcross North Residents Association
Bracknell Forest Council	Epsom and Ewell Borough Council	Loup Architecture
Brett	Department for Education	Lovell Partnerships Ltd,
British Horse Society	Friends families and travellers	Lyne Residents' Association
Brooklands College	Georgian Group	Lyne School
Browns Group Holdings Ltd.	Gladman Developments Ltd	Lyne Village Hall
Buckinghamshire Council	Glanville Consultants	Macegreen
Cameron JonesPlanning	Grade Planning Ltd	Maddox Planning
Carter Jonas	Hallam Land	Mayor of London
Carter Planning Ltd	Hambledon Land	MCS group Ltd
CBRE	Hamm Court Residents Association	Meadowcroft Community Infant School
CDS Planning	Hampshire County Council	Meath School
Chertsey Chamber of Commerce	Hart District Council	Mole Valley District Council
Chertsey Good Neighbours	Heathrow Airport	Montagu Evans LLP
Chertsey Museum	National Trust	National Grid
Natural England	Pegasus Group	Runnymede Christian Fellowship
Windlesham Parish Council	Penton Park residents Association	Runnymede Churches South
Network Rail	Philip Southcote School	Runnymede Council Residents' Association
New Haw Community Centre	Plainview Planning Ltd	Runnymede Deanery
New Haw Community Junior School	Plan Aware	Runnymede Foodbank
New Haw Residents Association	Runnymede Art Society	Runnymede Muslim Society
Newlands Developments	Planning Potential Limited	Rushmoor Borough Council
Newlands Uk	PMV Planning	Savills
North Surrey CAMRA	Pycroft Grange School	Sayes Court School
North West Surrey Valuing People Group	R Clarke Planning Ltd	SETPLAN
Nova Planning	Rainbow Day Nursery & Pre-School	Shanly Homes
Office of Road and Rail	Ramblers	Sigma Homes
Ongar Place Primary School	Redrow Homes	Slough Borough Council
Ottershaw & West Addlestone Residents Association	Reigate and Banstead Borough Council	South East Coast Ambulance Service NHS Foundation Trust
Ottershaw BRAG	Reside Developments	Sovereign Housing Association

Ottershaw C of E Junior School	Revera Limited	Surrey County Council
Ottershaw Society	Richborough Estates	Spelthorne Borough Council
Ottershaw Village Hall	Rickett Architects	Sports England
Ottershaw Women's Institute	Royal Borough of Windsor and Maidenhead	Squires Planning
Ottershaw Neighbourhood Forum	RSPB	St Anne's Catholic Primary School
Paul Dickinson and Associates	Runnymede Access Liaison Group, Elmbridge & Runnymede Talking Newspaper Association, Runnymede Disabled Swimmers Board, Surrey Coalition of Disabled People, North Surrey Disability Empowerment Group, Surrey Vision Action Group	St Ann's Heath Junior School
St Cuthbert's Catholic Primary School	Surrey Positive Behaviour Support Network (Surrey County Council)	The Victorian Society
St Johns Beaumont	Surrey Scouts	Thorpe C of E Primary School
St John's Church Egham	Surrey Wildlife Trust	Thorpe Lea Primary School
St Jude's C of E Junior School	Environment Agency	Thorpe Neighbourhood Forum
St Paul's C of E Primary School	Tandridge District Council	Thorpe Park (Merlin Entertainments Plc)
St Paul's Church Egham Hythe	Tarmac	Thorpe Ward Residents Association
Staines and District Synagogue	TASIS The American School in England	Transport for London
Stepsgates Community School	Taylor Wimpey	Turley
Stride Treglown	Terence O'Rourke Ltd	Turn2us
Stroude Residents Association	Tetlow King	UK Power Networks
Strutt and Parker	Thames Water Utilities Ltd	Union4 Planning
Surrey and Borders Partnership, NHS Trust	The Berkeley Group plc	United Church of Egham
Surrey Chamber of Commerce	The Egham Museum	Urban Green Developments
Surrey Coalition of Disabled People	The Emerson Group	Vail Williams LLP
Surrey Community Action	The Gardens Trust	Vanbrugh Land
Woburn Hill Action Group	The Holy Family Catholic Primary School	Virginia Water Neighbourhood Forum
Surrey Heath Borough Council	The Marine Management Organisation	Voluntary Support North Surrey

Surrey Minority Ethnic Forum	The Twentieth Century Society	Waverley Borough Council
Surrey Muslim Centre	The Theatres Trust	Wentworth Residents Association
Surrey Police	The Planning Bureau Ltd	West Addlestone Residents Association
Woking Borough Council	Woodland Trust	WSPA
Wokingham Borough Council	Woolf Bond Planning	WYG
Woodham Park Way Association	Wraysbury Parish Council	YoungsRPS
Stonehill Crescent Residents Association Limited Company		

Appendix B- Summary of the main issues raised by stakeholders during the preparation of the draft SPD and how they have been addressed (from public consultation carried out in Autumn 2021)

Representor	Summary of comments received	Officer response
Natural England	Natural England does not consider that this Pitch and Plot Allocation scheme poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	Noted
Ottershaw and West Addlestone Residents Association (OWARA)	<p>1-We believe the essential missing ingredient in the draft is 'Control'. From experience and for whatever reason, RBC's public image has shown remarkable lack of effective, prompt enforcement in many aspects of the planning process in the private domain. With such a ground-breaking notion as incorporation of these pitches within conventional planning applications it seems <i>vital</i> that the detail provides RBC with <u>best control</u> of them. To that end, retention of ownership of the pitches by a public authority is essential. Whether that be RBC or SCC is open to debate but since the Local Plan 2030 is owned by RBC, that is where we suggest the ownership sits best.</p> <p>From that point and with the assessment of allocation by RBC as described in your draft, rental of the pitches is probably best suited to a population of '<i>Travellers</i>' and '<i>Travelling Showpeople</i>'. Effective control (enforcement), should the need arise, on a tenant rather than a landowner will be less troublesome.</p> <p>Financially, the cost of this scheme could be neutral or positive for RBC. A developer is likely to donate these plots to the Local Authority on behalf of the community</p>	<p>1-The Council will be discussing matters associated with site management and ownership with individual site promoters/land owners as appropriate as part of the planning application process. Any agreements related to site management/ownership will reflected in the S106 legal agreements for the allocated sites.</p> <p>2-The Council is of the opinion that the use of planning conditions and S106 clauses are appropriate mechanisms to ensure that the pitches and plots are only occupied by eligible households, and are enforceable if any breaches occur.</p> <p>3- This point has been carefully considered by officers across a range of departments, however the considered view of officers is that it would not be appropriate to include additional criteria into the allocation scheme to address this point. This is because such criteria could have the unintended consequence of leading to discrimination against people/groups within the wider Travelling community who have protected</p>

	<p>and rental revenue will flow. RBC already manages a large housing stock which places it in a skilled position to manage this new type of housing which will be an integral part of a larger housing scheme in a residential area.</p> <p>2-If RBC decides to continue down the dubious path of private sale of these plots (as drafted in Para 2.3 and 2.4) we ask for stronger control of the ownership of the plots than through Section 106 agreements and subsequent future owners being 'written a letter' informing them of the status of their and future occupation of the plots.</p> <p>3- Finally, we understand that some gypsy and traveller communities do not mix well and to avoid lack of harmony, a recognition of this in the allocation process is desirable. This would be particularly important on adjacent plots.</p>	<p>characteristics. This could leave the Council open to legal challenge. It is recognised that some allocation schemes prioritise applicants who already have family on a site. The Council has considered this specific potential mitigation but this is not considered to present a solution for brand new sites. However, additional text has been added into the market pitches/plots section of the Allocation Scheme to allow applicants to apply in groups to acquire a number of pitches/plots on a site. Allowing family/other groups to apply in this way is considered to partially address the point made by the representor.</p>
Waverley Borough Council	Thank you for consulting Waverley Borough Council on the above consultation. Having reviewed the consultation documentation we have no comments to make.	Noted
Surrey County Council	Thank you for notifying us of this consultation. Our Land & Property team do not have any comments to make on this consultation.	Noted
Private individual	The consultation is hard to understand. Most Gypsies, especially the older generation do not read. We have had numerous allocation schemes for Gypsies. I am still yet to be given a plot and have been waiting for the past 19 years on one of the Borough's public sites.	<p>Officers responded to this email with the intention of offering assistance but received a bounce back.</p> <p>Efforts were made by the Council to make the public consultation as accessible as possible to the travelling community. A leaflet was</p>

		<p>prepared which was targeted at the travelling community to simplify what the consultation was about and provide contact details (email address and phone number) where travellers could find out more. Representative organisations were also engaged with; with leaflets also being passed to such groups, so they could help spread the word to the traveller community about what the consultation was about, and help any interested parties engage. Professional agents who are known to represent/have acted on behalf of traveller families in the Borough for planning purposes were also notified of the consultation.</p> <p>In particular, during the course of consultation, officers worked closely with the Showmen's Guild who distributed leaflets on the consultation to its Members and explained what it was about. The leaflet was also distributed to each of the pitches on the public traveller sites in the Borough, and at least 1 leaflet was sent to each of the private sites in the Borough.</p> <p>The Council also worked with the Surrey Gypsy Traveller Communities Forum who publicised the consultation to its members and provided information on their Facebook page and via Whatsapp.</p> <p>Following the publicity around the consultation, officers engaged with numerous Gypsies,</p>
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		<p>Travellers and Travelling Showpeople on the telephone, via email and face to face (with 2 face to face meetings being held with individual travellers). With their permission, contact details of all parties interested in acquiring a pitch or plot were recorded so that updates on the allocation scheme and construction of pitches/plots can be relayed.</p>
<p>Surrey Gypsy Traveller Communities Forum</p>	<p>We are writing back to you in support of the plans to provide more pitches for Gypsy, Roma, Travellers and Show People. There is a serious need for more accommodation and we are pleased to see you achieving this.</p> <p>Since the inception of the Surrey Gypsy Traveller Communities Forum (SGTCF) in 1996, the number one topic of concern has been the lack of site provision for growing families living in the county.</p> <p>Successive governments and local authorities have indicated that this continuing situation is intolerable given the documented need for accommodation, but despite some lengthy, expensive 'need' assessments, there has been little tangible evidence of new provision.</p> <p>We strongly support the creation of new sites, including ones placed on larger new housing sites. We suggest that the design of such sites is important both to provide quality housing for the occupants and to ensure a good visual impact. There are examples of new sites at Rose Meadow View, Bristol and Fenn Land, Cambridgeshire.</p>	<p>Support for the Council's proposals is welcomed. The Council will continue to ensure that new pitches/plots on larger housing sites are clearly shown on the approved plans as suggested. The Council is committed to working closely with the developers of these sites and organisations representing the G and T communities such as the Surrey Gypsy Traveller Communities Forum as site designs are finalised and as occupants take up their pitches/plots to ensure a smooth transition.</p>

	<p>It is important that such sites should be clearly shown as part of the original plan, not added afterwards so that other residents are unaware of them. It is important to require the developer to follow through on providing the accommodation.</p> <p>We also support new sites being given planning permission on land belonging to Gypsies and Travellers. We further support the extension of sites to include new pitches with appropriate consultation with present site occupants to ensure a satisfactory outcome.</p> <p>In the past, councils and councillors have been reluctant to agree to such sites, fearing reluctance from voters. Letters of objection usually contain the idea “We think there should be provision for Gypsies, but not here”, or something similar.</p> <p>New sites have been successfully and amicably established recently despite initial opposition. We feel that now is a time for councils to shoulder their responsibility to provide accommodation for all sections of the population without prejudice or discrimination.</p>	
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft allocation scheme	Noted
Verbal comments from private individuals	1-For the market plots, the Council should introduce some form of prioritisation to recognise that some travellers are in more need for the new pitches/plots than others. Request that the Council gives priority to the following families in particular:	1-The Equalities Assessment carried out to support the Allocation Scheme clearly shows that there are links between Gypsies and Travellers who have insecure accommodation and health and wellbeing outcomes in particular. As such, for the affordable pitches,

	<p>-those who are overcrowded but own no other land on which they can expand into;</p> <p>-those families who have an exceptional or unique healthcare reason to live in Runnymede;</p> <p>-Showmen who are currently unable to store and maintain their equipment on land that they own alongside their living accommodation.</p> <p>2-The Council should seek to verify applicants applying for pitches/plots do not actually own other land where they would have the ability to meet their own needs.</p> <p>3-The level of assets held by a Gypsy, Traveller or Travelling Showpeople is likely to far exceed the value set out in chapter 5 (assets of £16,000 beyond their mobile home/touring caravan) especially in the case of Travelling Showmen who own their own fairground rides.</p>	<p>there is a banding system included which will consider whether applicants are impacted by a number of factors which would give them a higher priority for any new affordable pitches or plots which come forward. However, it is considered to not be appropriate for the Council to intervene in the market and introduce criteria which seek to prioritise market plots, beyond ensuring that the terms of Policy SL22 are met. Instead, once the market pitches are set out and available for purchase, they will be advertised by the developers, who will consider the offers made by interested eligible parties, and as a private entity, they will decide which offer(s) they wish to accept.</p> <p>2- In terms of whether the Council can check whether applicants for the pitches and plots own land elsewhere which they could use to meet their accommodation needs, for affordable pitches and plots the application process will contain a “Disqualified Persons” criterion which will cover property ownership: <i>Applicants who own property either in the UK or abroad which they could reasonably be expected to reside in, or liquidate in order to resolve their own housing difficulties.</i></p> <p>However, in relation to market pitches and plots being sold privately, the Allocation Scheme SPD allows both speculators and those who wish to reside on the pitches and plots to</p>
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		<p>acquire them. This is in recognition of the fact that not all of the Borough's Gypsies, Travellers and Showmen are likely to be able to afford to purchase the allocated pitches and plots. Allowing speculators to also acquire the pitches and plots is likely to result in a mix of owned and rented accommodated in the local market to meet the needs of different households.</p> <p>Furthermore, this is also in line with Policy SL22 of the Local Plan, which stipulates that the relevant factors for the Council in each case (in terms of the occupation of the pitches/plots) will be whether the households can demonstrate that they are members of the Gypsy/Traveller/Showmen communities and whether they are able to demonstrate a local connection to the Borough. This means that individuals are able to purchase the allocated pitches and plots and rent them out, and still comply with the tests in Policy SL22.</p> <p>3-Agreed, for affordable plots, the Allocation Scheme has been amended to confirm that the value of any fairground rides owned by the applicant will not be included in the calculation of residual assets.</p>
Showmen's Guild	<p>1-concerns about speculators acquiring the plots. 2-anyone who acquires a plot should not be allowed to sell them on or sublet them for a specified period of time. Concerned about people trying to profit from the activity</p>	<p>1/2- In relation to market pitches and plots being sold privately, the Allocation Scheme SPD allows both speculators and those who wish to reside on the pitches and plots to acquire them. This is in recognition of the fact</p>

	<p>3-often children in their late teens, early twenties are covered under their parents memberships. As such, suggested that on the application forms a person would be asked to put down their Guild membership number or the membership number of their parents.</p> <p>4- requested that the draft application form was shared with the Guild prior to it being finalised so they could check that it would be in a suitable format for the Showmen.</p>	<p>that not all of the Borough's Gypsies, Travellers and Showmen are likely to be able to afford to purchase the allocated pitches and plots. Allowing speculators to also acquire the pitches and plots is likely to result in a mix of owned and rented accommodated in the local market to meet the needs of different households.</p> <p>Furthermore, this is also in line with Policy SL22 of the Local Plan, which stipulates that the relevant factors for the Council in each case (in terms of the occupation of the pitches/plots) will be whether the households can demonstrate that they are members of the Gypsy/Traveller/Showmen communities and whether they are able to demonstrate a local connection to the Borough. This means that individuals are able to purchase the allocated pitches and plots and rent them out, and still comply with the tests in Policy SL22.</p> <p>3-Noted. This will be addressed in the eligibility form.</p> <p>4-Request noted. The draft eligibility form will be shared with both the Surrey Gypsy Traveller Communities Forum and The Showmen's Guild for their comments before the form is finalised to ensure that it will be as accessible as possible to the traveller community.</p>
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Appendix C-Statement of Representations Procedure

The Council is holding public consultation of the draft Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document (SPD) for a period of eight weeks between Wednesday 5 June and midnight on Wednesday 31 July 2024.

Representations must be made in writing to:

Planning Policy Team
Runnymede Borough Council
Runnymede Civic Centre
Station Road
Addlestone
KT15 2AH

or by way of e-mail to planningpolicy@runnymede.gov.uk.

Anyone can make a request to be notified of when the SPD is adopted in their representation.

The draft SPD and supporting material is also available for inspection at the Civic Centre in Addlestone from 8.30am-5pm Monday to Thursdays, and 8.30am-4.30pm on Fridays, and at the following locations: -

- Addlestone Library (if required outside of Civic Office hours), Runnymede Civic Centre, Station Road, Addlestone, KT15 2AF
- Chertsey Library, Guildford Street, Chertsey, Surrey, KT16 3BE
- Egham Library, High Street, Egham, Surrey, TW20 9EA
- New Haw Community Library, The Broadway, New Haw, Surrey KT15 3HA
- Virginia Water Community Library, 6 Station Parade, Virginia Water GU25 4AB

Details of library opening times can be found on the Surrey County Council website at <https://www.surreycc.gov.uk/libraries>.