

**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 2025

## **1. Introduction**

- 1.1 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.
- 1.2 This statement sets out how the Council has engaged various stakeholders during the preparation of the draft Runnymede Borough Council Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document (SPD) (hereafter referred to as the Allocation Scheme SPD).
- 1.3 A list of all those persons who have been consulted on the Allocation Scheme SPD is set out in Appendix A. It should be noted however that this appendix 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 finalisation of this document.

### **Chronology of engagement**

- 2.1 The draft Allocation Scheme was first considered at the Council's Infrastructure and Economic Development Working Party on 15th March 2021 and the Housing and Enablement Working Party on 21st July 2021. A summary of the comments made on the draft Allocation Scheme (which was not proposed to be an SPD at this point in time) at these meetings is set out as follows:

#### **Infrastructure and Economic Development Working Party:**

- Support for the policy and local connection criteria.
- It was suggested that officers looked at the allocation criteria for the SCC public sites as a comparable.
- The importance of enforcement in ensuring our existing and future plots are used by persons who met the criteria was emphasised.
- It was questioned whether the travelling community would be able to get a mortgage for the pitches, and if they couldn't, whether this would limit the number of households able to acquire a pitch.

### **Housing and Enablement Working Party**

- There was slight Member concern around applicants only being able to join the register for affordable pitches should they advise on their current address. Officers advised that being on an unauthorised or crowded pitch, would not necessarily preclude residents from applying for a pitch – a flexible approach would be applied. Generally, the majority of applicants who approach RBC were prepared to provide some evidence of where they live.
- Some Members stated a preference for RBC to take on the ownership of the pitches/plots and to manage them.
- Concerns expressed around the challenges of enforcement.
- Officers were asked to consider ways to improve engagement with the traveller community.
- Officers were asked to provide an annual review of progress against delivery of the local plan. This would involve geographic breakdown by ward, versus how much social housing has been delivered by ward in the same period.
- A Member suggested setting up a Housing Association solely to manage traveller pitches, although officers advised a minimum quantum of units would be required to operate – most probably across the entire county.
- Members agreed with the eligibility criteria for applicants matching the Allocations Policy, to have lived or worked in the borough for three years of the past five years, however key to this would be the consultation process.

2.2 Following this early engagement, the draft Allocation Scheme was approved by both the Planning Committee (1st September 2021) and the Housing Committee (8th September 2021) for a period of public consultation. This consultation occurred between 15th October and Friday 26th November 2021. Beyond the requirements of the SCI, the Council also adopted the following techniques to make the public consultation as accessible as possible to the travelling community:

- A leaflet was 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. The leaflet was 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.
- Representative organisations were 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. This includes the Showmen's Guild of Great Britain.
- 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.
- The Council 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.

- 2.3 Following the publicity around the consultation, officers engaged with numerous Gypsies, 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 progress of the Allocation Scheme SPD and the delivery of the allocated pitches/plots could be relayed.
- 2.4 The Planning Policy Team considered all the responses received during formal public consultation. 7 representations were received in total, and a number of verbal comments were made to officers which were also captured. Appendix B contains a table setting out the main issues raised in these representations. It also sets out the Council's response to each of the points raised, the changes made to the document as a result (where appropriate), or explains why no changes were considered necessary.
- 2.5 During the first period of public consultation, a further member briefing was held on the draft contents of the document on 11th November 2021. A summary of the comments made during this meeting are summarised as follows:
- Concern about 'medical and disability' being included in affordable list bandings as a lot of traveller families seem to have health issues. Concern that this could distort the picture and it could be hard to assess all cases. It was commented by officers that the Housing team is very experienced in interrogating health information in detail.
  - Officers need to take account of the tribal nature of G and T communities. Some families will not want to live alongside other families. They will not want to mix with them. If we make mistakes, this could have wider implications.
  - Concern about pitches being sold as freehold products. Question as to whether the Council should be seeking to acquire and then rent out.
  - Query as to whether it was appropriate to follow the same approach as set out in the allocation scheme for the sites actually owned by Gypsies and Travellers. Officers commented that Policy SL22 of the local plan only related to the new sites allocated.
  - It was felt that offering some pitches and plots to the retired G and T community could be a good idea. This would help families stay in close proximity to one another.
  - It was questioned whether the next Local Plan can insist that allocated pitches and plots are offered back to the Council. Officers did not feel that this could be insisted upon.
- 2.6 During the period of this first round of formal public consultation, Council officers also met with the Treasurer from the Showmen's Guild of Great Britain to discuss the draft document.

- 2.7 Following the initial round of public consultation, the Infrastructure and Economic Development Working Party discussed potential revisions to the Allocation Scheme at a meeting held on 23rd February 2022. A summary of the comments made at this meeting are as follows:
- Officers were asked to check on the licensing requirements associated with the provision of new traveller sites.
  - Officers advised that they felt that the document should be prepared as a Supplementary Planning Document (SPD) moving forwards to give the document a greater status in the decision taking process.
  - Officers were asked to consider including text regarding the need for developers to provide the Council with information on any offers received for pitches (and why they were not accepted, if relevant), and also for affordable pitches; the number of refusals allowed.
- 2.8 Given the delays in bringing forward the pitches and plots on the sites allocated in the Local Plan, the progression of the document (which by this point was proposed to be made an SPD) was then put on hold whilst officers focussed on other priority projects. Work started again on the Allocation Scheme SPD in Autumn 2023. On 13th September 2023, an officer from the Council attended a meeting of the Surrey Gypsy Traveller Forum and gave a presentation on the proposed contents of the Allocation Scheme and changes to be made following the first round of public consultation.
- 2.9 The change in the definition of a traveller in the Planning Policy for Traveller Sites (PPTS) was made in December 2023. This occurred following the Court of Appeal judgement *Smith v. SoS for Levelling Up, Housing and Communities* in October 2022. Officers reviewed both the draft Allocation Scheme SPD and the accompanying Equalities Assessment as a result and made amendments to both as appropriate.
- 2.10 The changes made to the draft Allocation Scheme SPD following the first period of public consultation are summarised in paragraph 1.11 of the report which was taken to the Planning Committee on 29th May 2024 (when permission from the Planning Committee was sought to conduct a second round of public consultation. The officer report can be viewed [here](#) (see item 8)).
- 2.11 A further round of public consultation subsequently occurred between 5<sup>th</sup> June and 31<sup>st</sup> July 2024. The Planning Policy Team has considered all the responses received during formal public consultation. 8 representations were received in total. Appendix C contains a table setting out the main issues raised in these representations. It also sets out the Team's response to each of the issues, the changes made to the SPD as a result of the issue, or explains why no changes were considered necessary.

- 2.12 The Planning Policy Team publicised the consultation on the Council's website, and distributed the consultation documents in the Borough's libraries and main office at the Civic Centre in Addlestone, in accordance with the Council's Statement of Community Involvement (SCI). The consultations were also promoted to the local community via the Council's social media channels.
- 2.13 Having considered the representations received and the officer responses, it was agreed that a final period of public consultation between 3rd February and 3rd March 2025 would take place. This additional round of public consultation was considered to be necessary in light of the publication of an amended version of the Planning Policy for Traveller Sites (PPTS) in December 2024 which amended the definition of a gypsy and also given the number of changes which were made to the SPD following the June/July 2024 consultation. A summary of the changes made following this consultation is set out below:

- **Chapter 2-Background:** Minor wording changes in first paragraph. One extra sentence added to provide clarification.
- **Chapter 3- Securing sites in perpetuity for gypsies, travellers and travelling showpeople:** Chapter title shortened, minor wording changes in a number of paragraphs, model wording for planning condition used to restrict the occupation of allocated pitches to gypsies, travellers and travelling showpeople added after para 3.1. Definition of a gypsy and traveller updated at paragraph 3.3 in light of the new definition in the 2024 version of the Planning Policy for Traveller Sites. Paragraph 3.6 deleted to avoid duplication with wording already contained in chapter 9. Additional bullet point added to good practice list at para 3.9. New paragraph of text added at para 3.13 to confirm that when, following a reasonable period of marketing, pitches cannot be disposed of to gypsy and traveller households who meet the definition in the Planning Policy for Traveller Sites (PPTS) and who have a local connection to the borough, that the pitches will be able to be disposed of/occupied by traveller households who are unable to meet the local connection criteria. This will help ensure that the pitches are less likely to be lost to alternative uses given the acute need for them in Runnymede.
- **Chapter 4-The Council's policy for allocation (to preserve access for those with a local connection):** Local connection criteria amended to ensure that they are sufficiently tailored to support the traditional ways of life of the travelling community. In particular, removal of the terms 'permanent' and 'consecutive', and replacement of the word 'household' with 'family' to facilitate extended family links. Relevant explanatory text also added. Some additional text has also been added to the definition of employment, and the reference to health and welfare needs needing to be 'unique' or 'exceptional' has been deleted. This is following discussions with the Council's Housing

Department, to ensure consistency with proposed amendments to the Council's Housing Allocation Scheme which were recently the subject of public consultation.

- **Chapter 5-phasing and trigger points:** Minor wording changes proposed to model S106 clause wording. Second part of clause deleted to avoid repetition.
- **Chapter 6-Affordable pitches and plots:** One sentence added to confirm that where affordable pitches are delivered, this will count towards the total affordable housing requirement for the allocated site. One sentence deleted in para 6.4 given that the SPD is proposed to set out at new para 3.13 that in some instances, disposing of pitches to travellers without a local connection will be acceptable.
- **Chapter 7-Evidence required in support of an eligibility form:** Two wording changes proposed to tie in with amendments to the local connection criteria in chapter 4 ('household' to 'family'). Earnings thresholds also amended in para 7.7 following discussions with the Council's Housing Department, to ensure consistency with amendments being considered by the Housing Department to the Council's Housing Allocation Scheme. The words 'unique or exceptional' are proposed to be removed from the text relating to health and welfare needs to ensure consistency with the rest of the document.
- **Chapter 8-General points related to allocated pitches/plots:** Minor textual amendments made to paragraph 8.2 to tie in with the proposed content of paragraph 3.13.
- **Chapter 9-Data Protection and privacy:** The Surrey Gypsy Traveller Communities Forum has been added as a possible organisation that the Council may request consent from applicants to engage with to aid the verification of information in eligibility forms. Some minor textual additions have been made to para 9.5 and the text regarding the Council's proposed retention of people's details for future relets and sales has been deleted.
- **Chapter 13-Fraud:** Clarification that fraud checks will only be carried out for affordable pitches and plots.
- **Chapter 14- Review of this Scheme:** No proposed amendments.
- **Throughout document-**References to Travelling Showmen amended to Travelling Showpeople to be consistent with language used in the Planning Policy for Traveller Sites.

- 2.14 The consultation was intended to give interested parties the opportunity to make any additional comments they had on the contents of the SPD in light of the change in definition at a national level and the other changes described above.

- 2.15 The final round of consultation took place between 3rd February and 3rd March 2025 as scheduled. The Planning Policy Team publicised the consultation on the Council's website, and distributed the consultation documents in the Borough's libraries and main office at the Civic Centre in Addlestone, in accordance with the Council's Statement of Community Involvement (SCI). The consultations were also promoted to the local community via the Council's social media channels.
- 2.16 The Planning Policy Team has considered all the responses received during formal public consultation. 109 representations were received in total. Appendix D contains a table setting out the main matters raised in these representations. It also sets out the Council's response to each of the issues, and confirms the changes made to the SPD as a result of the issue raised (where applicable).

### **Next Steps**

- 3.1 The Council has considered all the responses received during early engagement and formal consultations.
- 3.2 A final version of the SPD will be presented to the Planning Committee in May 2025 for adoption and implementation. Once implemented, the SPD will become a material consideration in decision-making on planning applications. The Planning Committee Minutes can be accessed at:  
<https://democracy.runnymede.gov.uk/mgCommitteeDetails.aspx?ID=153>



## Appendix A - List of Persons Consulted on the draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD (May 2024)

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	Pyncroft 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
Stepgates Community School	Taylor Wimpey	Turley
Stride Treglown	Terence O'Rourke Ltd	Turn2us
Stroud 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 Allocation Scheme and how they have been addressed (from public consultation carried out in Autumn 2021)**

<b>Representor</b>	<b>Summary of comments received</b>	<b>Officer response</b>
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, <b>retention of ownership of the pitches by a public authority is essential</b>. 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 <b>should be</b> provision for Gypsies, but <b>not here</b>”, 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;          -those families who have an exceptional or unique healthcare reason to live in Runnymede;          -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.</p> <p>2-anyone who acquires a plot should not be allowed to sell them on or sublet them for a specified period of time.</p> <p>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-Summary of representations received during public consultation carried out between 5 June and Wednesday 31 July 2024**

Representor	Summary of comments made	Council response	Change made to SPD?
Ottershaw Neighbourhood Forum	<p>1. General. The policy seems to be on a plot by plot and case by case basis. Is this the best way or should there be an eligibility assessment and application which places them on a prioritised “waiting” list. The individual including site preferences could be checked when a plot comes available.</p> <p>2. Section 1. Section needs rewriting. Paras 1.3, 1.4, 1.5, 1.6 are all related to the current review process and should be removed.</p> <p>3. Section 2. Para 2.1. Amend to “across 9 <b>other</b> housing....”</p> <p>4. Section 2. Para 2.2. Last Bullet. The policy does not explain what is meant by “off-site” in this context.</p> <p>5. Section 2. Para 2.4. “Allocation Scheme”. It is not clear what this is. The policy talks of “Allocation policy”. Explain what the scheme is if different.</p> <p>6. Section 2. Para 2.5. Talks of Chapters and the contents refers to this. This doc states</p>	<p>1. For any affordable pitches which come forward, there would be a prioritised waiting list based on the banding criteria presented in chapter 6 of the SPD. The Council previously considered holding a prioritised waiting list for the market pitches, however, decided that it was not appropriate to intervene in the open market, when the Council does not do this for any other open market products.</p> <p>2. This chapter was only ever considered a temporary chapter whilst the document was in draft form and subject to consultation. It has been replaced in its entirety in the final version of the document.</p> <p>3. Amendment accepted.</p> <p>4. ‘Off site’ in the context of policy SL22 is addressed elsewhere in the policy (see page 109, second half of page). It is considered that further elaboration is not required in the SPD.</p> <p>5. Additional text added at paragraph 2.3 to provide clarification.</p> <p>6. The document refers to chapters throughout. SPDs can vary in terms of</p>	<p>Yes in response to point 2. See amendments to chapter 1.</p> <p>In response to point 3, please see amendment to para 2.1.</p> <p>In response to point 5, please see amendment to para 2.3.</p> <p>In response to point 7, please see amendment to the chapter title.</p> <p>In response to point 8, please see amendment to para 3.1.</p>

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>sections. Are SPDs in Sections or chapters (for consistency).</p> <p>7. Section 3. Precis the Title.</p> <p>8. Para 3.1 Given that the allocated pitches/plots are restricted <b>exclusively</b> for the use of the Gypsy/Traveller Showmen communities, a planning condition will be attached to the relevant planning consents for the allocated sites <b>at para 2.4</b> to ensure that they cannot be occupied by <b>any other parties</b>.</p> <p>9. Question. Is there an “unless” issue here whereby a pitch may not be sold to one of the GT &amp; S community? If so this needs to be caught somewhere.</p> <p>10. Para 3.2. Query whether you can legitimately state “or any other replacement guidance.”</p> <p>11. Para 3.8 “....agreement <b>for sites</b> containing allocated pitches....”.</p> <p>“....the delivery of the X(non-transit type) pitches on the Gypsy and Traveller Pitches <b>allocated</b> Land;”</p>	<p>their headings, as long as they are consistent throughout.</p> <p>7. Title of chapter shortened.</p> <p>8. Suggested amendments partially accepted. Model condition to restrict the use of the pitches to Gypsies and Travellers/Travelling Showmen also now included in the SPD for completeness.</p> <p>9. The matter of alternative uses is dealt with at para 3.13. This sets out the process that would be followed if it can be evidenced that after comprehensive marketing, the pitches cannot be disposed of to the travelling community. If the representor is asking instead what would happen if an allocated pitch was found to have been sold to/or rented out by a non traveller, in this case, the Council would be able to consider the appropriateness of using its enforcement powers if a breach of planning condition or obligation was found to have occurred. It is considered that further text in the SPD is not required to address either point.</p> <p>10. This phraseology is consistent with the wording contained in Policy SL22 which was agreed with the Planning Inspector who examined the Runnymede</p>	<p>In response to point 13, please see amendment to paragraph 3.9.</p> <p>In response to point 17, see definition of family which has been added at the bottom of page 11.</p> <p>In response to point 18. See para 4.1 b and footnote 2 on page 11</p> <p>In response to point 19. See para 4.3.</p>

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>“the marketing of the Gypsy and Traveller Pitches <b>Allocated</b> Land”</p> <p>“the disposal of the Gypsy and Traveller Pitches <b>Allocated</b> Land.”</p> <p>12. Note: An explanation is required for the scope of “Disposal”.</p> <p>13. Para 3.9 “Friends, Families and Travellers....”</p> <p>14. Para 3.11. First para. The model wording suggests that the G,T &amp; S pitches always follow from the residential development. Will this always be the case. It seems possible these could be marketed earlier and sold/rented.</p> <p>15. Para 3.14. The para does not stipulate what the vehicle is to ensure a purchase to sub-let is to an appropriate person or group. This seems to be a two tier approach as once owned the plot could be re-let. How does RBC track change of occupancy?</p> <p>16. Para 4.1. Statement is not completely true as previous section allow the plot to be sold for other use. Needs clarification.</p>	<p>2030 Local Plan and is therefore considered to be appropriate.</p> <p>11. It is considered that the word ‘allocated’ does not require inserting in the model wording as the S106 agreement comes with the land which is outlined in red on a plan appended to the agreement, making it clear which land the legal agreement relates to.</p> <p>12. Agreed, moving forward the legal agreements for these sites will be amended to provide clarification on this point.</p> <p>13. comma added</p> <p>14. Yes this is possible. Policy SL22 sets out that, ‘Phasing of site delivery and trigger points to secure early delivery, proportionate to the site delivery’ will be set out in the s106 agreements. To date, on all allocated sites, the developers have sought to develop out an early phase/phases of residential development before delivering the pitches, and the Council has been content that this is in line with Policy SL22. If a developer sought to deliver the pitches first, the model wording would be amended as appropriate.</p> <p>15. The Council expects the owners of the pitches and plots to comply with the</p>	

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>17. 4.1a. Does this need to be adult.</p> <p>18. 4.1b. “employed” requires defining.</p> <p>19. 4.1c. The welfare aspect of this is undefined.</p> <p>20. Para 7.7. Does not cover vehicles. Are these included or excluded. Most vehicles exceed £16000 value. How is this demonstrated?</p> <p>21. Para 7.8. Do all have bank accounts? What is scenario if not.</p>	<p>terms of the planning consent including the S106. However, as with all other breaches of planning control, any breaches brought to the Council’s attention will be investigated and assessed on a case by case basis in accordance with the Council’s enforcement charter.</p> <p>16. If an alternative use was agreed for the land set aside for pitches, the guidance in this chapter would no longer be relevant and would therefore cease to apply.</p> <p>17. The local connection criteria have been amended to define who would be applicable (see bottom of page 11 in draft document).</p> <p>18. This is defined in footnote 2. The position of footnote 2 has been moved to the end of the ‘Employment’ sub heading at 4.1b to ensure that it is more prominent to the reader. In discussion with the Council’s Housing Team, further changes have also been made to the definition of employment at footnote 2 to tie in with proposed changes to the Council’s Housing Allocation Scheme for social housing (currently subject to public consultation).</p>	



Representor	Summary of comments made	Council response	Change made to SPD?
		<p>19. The wording in paragraph 4.3 has been amended to address this point. Subsequent changes to this paragraph have also been made following discussions with the Housing Team. In particular the word 'unique' has been removed to tie in with proposed changes to the Council's Housing Allocation Scheme for social housing (currently the subject of public consultation).</p> <p>20. Assets would include cars. In line with paragraph 7.8, applicants would be required to provide bank statements for all working members of the household to check savings levels. A fraud check would also be required for all affordable pitches which would pick up on undeclared bank accounts.</p> <p>21. Advice has been sought from the Council's Housing Department who has confirmed that it would be reasonable to consider that most applicants would at least have bank accounts.</p>	
Private individual	1. Unclear why the Planning Committee considered a planning application for the Chertsey Bittams C allocation before consultation on the SPD has ended.	1. The Chertsey Bittams C site is allocated in the Runnymede 2030 Local Plan, under Policy SL16 for 9 net additional C3 dwellings, 11 net additional serviced Gypsy/Traveller pitches and permanent retention of the existing	None

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>2. Question as to why the planning department is intent on turning the Chertsey Bittams area into a traveller ghetto? Questions whether there are other parts of Runnymede in which travellers can live.</p> <p>3. Question as to why travellers are treated as a special case. Most of them have become settled in static homes and no longer travel. There are plenty of young couples desperate for a home, who are being pushed aside for so called ethnic minorities who are now so embedded in this country that they should no longer be special cases.</p> <p>4. Runnymede should get a grip and treat everyone equally, that is true equality. This proposal is prioritising some people, whose ancestors used to move around in caravans, over others of similar ethnicity, whose ancestors settled in one place.</p>	<p>temporary pitch. There is nothing to preclude planning applications coming forward on sites allocated in the Local Plan prior to this SPD being adopted. The SPD will not introduce new policy against which such applications will be assessed, but will provide further guidance to assist with the interpretation of certain parts of Policy SL22 of the Local Plan which is concerned with Meeting the Needs of Gypsies, Travellers and Travelling Showpeople.</p> <p>2. The distribution of proposed gypsy and traveller pitches was considered both during the preparation of the Local Plan, and at the Examination stage by an independent inspector appointed by the Secretary of State. The Council's approach was found to be sound in this regard.</p> <p>3/4. Travellers are not treated as a special case or prioritised over other groups. Para 63 of the NPPF sets out that the Council is required ensure that the, <i>'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should</i></p>	

Representor	Summary of comments made	Council response	Change made to SPD?
		<p><i>include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes’.</i></p> <p>The Council assessed the accommodation needs of all these groups during the preparation of the Runnymede 2030 Local Plan (with the exception of looked after children as this additional requirement was only added to the NPPF in December 2024).</p> <p>Paras 3 and 4 of the Planning Policy for Traveller Sites (PPTS) state, ‘3. <i>The Government’s overarching aim is to ensure 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’.</i></p> <p><i>4. To help achieve this, Government’s aims in respect of traveller sites are [amongst other things]:</i></p>	

Representor	Summary of comments made	Council response	Change made to SPD?
		<p><i>a. that local planning authorities should make their own assessment of need for the purposes of planning</i></p> <p><i>b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites</i></p> <p>The Council has sought to comply with these national policy requirements through the production of its adopted Local Plan by making provision for the specialist groups listed in para 63 of the NPPF where a need has been identified.</p> <p>Furthermore, the 2023 amendment to the definition of a gypsy and traveller for planning purposes confirmed that gypsy households who had ceased to travel on grounds only of their own or their family's or dependants' educational or health needs or old age are captured under the definition. The 2024 amendment to the definition also now includes, 'all other persons with a cultural tradition of nomadism or of living in a caravan'</p>	

Representor	Summary of comments made	Council response	Change made to SPD?
Private individual	Pitches for gypsies should be allocated in different towns, not Addlestone, Ottershaw or Chobham.	The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of pitches is not being revisited as part of the preparation of this SPD.	None
National Highways	Have reviewed the documentation but have no comments to make	Noted	None
Rushmoor Borough Council	No comments to make	Noted	None
Environment Agency	<p>We note the allocated sites below are in flood zones.</p> <ul style="list-style-type: none"> <li>• SL6 – Pyrcroft Road, Chertsey – in accordance with your redline boundary the site lies in Flood zones 2, 3a and 3b</li> <li>• SL7 – Thorpe Lea Road, North - in accordance with your redline boundary the site lies in Flood zones 2, 3a and 3b</li> <li>• SL14 – Parcel A, Chertsey Bittams, Chertsey - in accordance with your redline boundary the site lies in Flood zones 2 and 3a</li> </ul> <p>We have identified the sites boundaries by using <a href="#">Maps</a> on your website and on that basis have provided you with this advice below.</p>	<p>Comments noted. The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of pitches is not being revisited as part of the preparation of this SPD. No objection was raised by the Environment Agency on the inclusion of pitches on these allocations at the time of preparing the Local Plan.</p> <p>Planning consents have been granted for residential developments (including the allocated traveller pitches) at Chertsey Bittams A and Pyrcroft Road following consultation with the Environment Agency. All of the pitches on these sites would be located in flood zone 1. There is a live application under consideration at Thorpe Lea Road (North) where 2 pitches</p>	None

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>Gypsy and Traveller/Travelling Showmen Schemes (Caravans, mobile homes and park homes intended for permanent residential use) are classified as 'Highly Vulnerable' development according to Annex 3 in NPPF. It should be noted that 'Caravans, mobile homes and park homes intended for permanent residential use (Highly Vulnerable' development) is not appropriate in Flood Zone 3a and 3b in accordance with the flood risk section of the PPG (Table 2 Flood risk vulnerability and flood zone 'incompatibility) and therefore should not be permitted. This would apply to - <i>SL6 – Pyrcroft Road, Chertsey and SL7 – Thorpe Lea Road, North and SL14 – Parcel A, Chertsey Bittams, Chertsey.</i></p> <p>RBC must consider;</p> <ul style="list-style-type: none"> <li>- <u>all</u> sources of flooding when assessing flood risk for all the sites (apart from the 3 sites above) listed on page 4 of the SPD. (Please note, a Flood Risk Assessment which demonstrates the requirements of NPPF and PPG may be required for sites greater than 1 hectare).</li> <li>- a route of safe access and egress <i>to an area of safe refuge in the event of a flood</i> must be provided for all the sites (apart from</li> </ul>	<p>are proposed in line with the allocation policy. The Council has consulted with the Environment Agency as part of this application.</p>	

Representor	Summary of comments made	Council response	Change made to SPD?
	the 3 sites above) listed on page 4 of the SPD.		
Leo Property Group	<p>1. The SPD runs to 25 pages, which is excessive when you consider that it only relates to 45 pitches of which 19 are situated at Chertsey, Bittams</p> <p>2. Local Plan Policy SL22 is not clear as to whether or not pitches can be utilised as an affordable element of a development scheme</p> <p>3. Local Plan Policy SL22 states site delivery should be secured early. This puts an additional pressure on landowners/developers in relation to infrastructure. Early site delivery should not be required.</p> <p>4. Paragraph 3.3 of the SPD defines Gypsies and Travellers as “<i>Persons of nomadic habit of life whatever their race or origin</i>”. However, there are other races and origins who might have a nomadic habit of life and does this mean that they qualify for a plot under the SPD.</p> <p>5. In paragraph 4.1a) the Councils policy for allocation state that you have to be a “permanent member of your household, live</p>	<p>1. Noted</p> <p>2. If any of the allocated pitches were delivered as an affordable product, this would count towards the total affordable housing requirement for the allocated site in question. This is already confirmed in the final bullet point of Policy SL22 of the Local Plan but has been clarified in the SPD.</p> <p>3. Policy SL22 has been adopted and is not being revisited as part of the preparation of this SPD. Whilst an SPD can provide further clarification on how a policy should be interpreted, it cannot change the wording of Policy SL22 or introduce a new and contrary policy approach.</p> <p>4. The definition at para 3.3 is copied directly from the Planning Policy for Traveller Sites (PPTS). The PPTS confirms that this national definition is the appropriate definition for the purposes of planning policy. It should be noted that the definition of a gypsy and traveller has been updated in the draft SPD to reflect the updated wording in the December 2024 NPPF. This now includes, ‘other</p>	<p>Yes in response to 2. Please see paragraph 6.3.</p> <p>Yes in response to 5. Please see amendments to the local connection criteria in chapter 4.</p>

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>in the borough of Runnymede and have done so for at least 3 of the past 5 consecutive years or 6 out of the last 12 months if an individual is homeless". This seems to be a conflict of the definition of a nomadic lifestyle.</p> <p>6. In relation to the marketing of the pitches and plots, it is not clear whether the Council expect separate marketing for the pitches. There is a risk of creating separation and exclusion for the occupiers of the plots which is surely not intended.</p> <p>7. There is no guidance as to how much a plot should be rented or sold for. Is it intended that developers will set their own prices and if so will that impact on the success of any marketing campaign.</p> <p>8. The model wording for Section 106 agreements in paragraph 3.11 is unduly onerous. The number of pitches required is only a small proportion of each proposed development and the idea that the first residential unit cannot be occupied until the scheme is approved is excessive. Furthermore, there needs to clarity on the required period of marketing.</p>	<p>persons with a cultural tradition of nomadism or of living in a caravan'.</p> <p>5. Local connection criteria are required by Policy SL22. The criteria in the SPD are based on those adopted by the Council in its Housing Allocation Scheme but have been amended in some areas to ensure that they do not prejudice the nomadic nature of the travelling community. Further changes have been made to the criteria to further ensure that they do not conflict with the nomadic lifestyle of some traveller households. For example, the terms 'consecutive' and 'permanent' have been removed. For the residence and employment tests, the word 'household' has also been substituted for 'family' in acknowledgement of the fact that the distinctive way of life and traditions of gypsies and travellers is frequently based around living in extended family groups. As amended, the local connection criteria are considered to be sufficiently flexible to ensure that those wishing to acquire the allocated pitches have a genuine connection to the borough, whilst also supporting traditional ways of life and allowing for nomadic lifestyles.</p>	



Representor	Summary of comments made	Council response	Change made to SPD?
	<p>9. There is real concern that occupiers of these pitches will at some time in the future seek to build permanent residential dwellings. We will include a restrictive covenant against this in the title to our site. This needs to be emphasised in the SPD.</p> <p>10. There is concern that there is nothing in the SPD ensuring that pitches do not become small farm holdings, including the likes of horses, chickens and other gypsy and traveller related animals, because this will have a detrimental impact on value.</p> <p>11. It is proposed that each pitch is 500 SQM – Whilst this might be acceptable on much larger sites (more than 50 dwellings) for smaller sites this is wholly disproportionate and more likely to lead to occupiers seeking to develop their plots in the long term.</p> <p>12. We represent gypsies and travellers in Liverpool where we are based and having spoken to them they have said that their absolute preference is for sites of not less than 10 pitches because otherwise this leads to fragmentation of their communities. Putting 2 pitches here or there across the borough actually does more harm than good for the gypsy and traveller community and really the</p>	<p>6. It will be up to the developers to decide how they market the pitches. The SPD seeks to avoid being prescriptive in this regard. Instead of envisaging separate marketing, it is more the case that some additional marketing measures may be required to raise awareness of the pitches to the Gypsy and Traveller community.</p> <p>7. Developers are expected to determine a suitable sales/rental value for the allocated pitches. The Council does not seek to guide developers/land owners on how to value houses or other development types, and can see no reason to deviate from this approach for the allocated pitches. Guidance in para 3.9 of the SPD confirms that as part of the marketing strategy for the pitches, the developer is encouraged to include <i>details of the process to be followed, and factors that the land owner/developer will take into account in implementing price reductions as necessary to maximise the chances of disposing of the pitches and plots</i>. By following this advice, it is envisaged that a marketing campaign would not be compromised.</p> <p>8. The Council is of the view that given the small number of pitches on each allocated site that the requirement is not</p>	

Representor	Summary of comments made	Council response	Change made to SPD?
	<p>objectives of the SPD would be far better served by allocating a larger site for more pitches.</p>	<p>overly onerous. The caveats are considered necessary to ensure the prompt delivery of the pitches given the acute needs for this type of specialist accommodation in Runnymede.</p> <p>9. Para 3.1 SPD confirms that, <i>'Given that the allocated pitches/plots are restricted for the use of the Gypsy/Traveller Showmen communities, a planning condition will be attached to the relevant planning consents for the allocated sites to ensure that they cannot be occupied by non travellers'</i>. Policy SL22 of the Local Plan further confirms that, <i>'The loss of authorised pitches and plots for Gypsies, Travellers and Travelling Showpeople to other uses will be resisted unless it can be demonstrated that there is a surplus supply of traveller pitches and plots for gypsies and travellers in the Borough'</i>. These safeguards are considered sufficient to resist the loss of the allocated pitches in the future.</p> <p>10. The need for and suitability of planning conditions to control development is considered on a case by case basis. Generally speaking however, at 500sqm, the pitches are considered too small to accommodate large animals such as horses. In relation to smaller animals</p>	

Representor	Summary of comments made	Council response	Change made to SPD?
		<p>(cats, dogs, chickens for example) it is likely to be discriminatory to impose a planning condition to restrict the keeping of such animals when this is generally not a condition attached to planning consents for new bricks and mortar homes.</p> <p>11. 450-500sqm is recommended in the Runnymede Design SPD as the minimum size for gypsy pitches. However, this is guidance only. An alternative size of pitch may be acceptable provided it can be demonstrated that the pitch is large enough to contain:</p> <ul style="list-style-type: none"> <li>-Adequate space for parking,</li> <li>-pitch boundary treatment which respects and enhances existing character;</li> <li>-space for a mobile home and touring caravan;</li> <li>-an area of private amenity space capable of accommodating activities such as outdoor play, drying clothes and storage;</li> <li>-an attractive hard standing area suitable for use by trailers, touring caravans or other vehicles and which takes account of sustainable drainage; and</li> <li>-an amenity building to provide as a minimum water and electricity supply, toilet, personal washing and laundry facilities. See comments made in response to 9. above about the controls</li> </ul>	

<b>Representor</b>	<b>Summary of comments made</b>	<b>Council response</b>	<b>Change made to SPD?</b>
		<p>which are in place to help resist the redevelopment of the pitches.</p> <p>12. The number of pitches per site has been established in the Local Plan and is not a matter for consideration as part of the SPD.</p>	
Waverley Borough Council	Having reviewed the document have no comments to make.	Noted	None

## Appendix D-Summary of representations received during public consultation carried out between 3 February and 3 March 2025

Representor	Summary of comments	Response	Changes made to the SPD
Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider:</p> <ul style="list-style-type: none"> <li>- Whether there are opportunities presented by the SPD to make provision for Green Infrastructure;</li> <li>-Whether any implications arise from the SPD relating to biodiversity net gain;</li> <li>-Whether the SPD presents any opportunities to secure wider biodiversity enhancements;</li> <li>-Whether the SPD has any implications for protected species;</li> <li>- Whether the SPD provides any opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources</li> </ul>	<p>As the SPD is primarily focused on setting the eligibility criteria for the allocated pitches and plots, and providing other useful guidance which is supplementary to planning policy SL22 of the Runnymede 2030 Local Plan (which is concerned with meeting the accommodation needs of gypsies, travellers and travelling show people), it is considered that this SPD does not present opportunities to incorporate additional guidance on matters such as green infrastructure, biodiversity net gain, protected species etc, as this would not be supplementary to the part of Policy SL22 that additional guidance is being provided on. However additional guidance on designing gypsy and traveller sites is provided in the Runnymede Design SPD. This encourages the incorporation of green infrastructure including boundary hedging, soft landscaping and green space into site design where appropriate. This is in addition to adopted policies being included in the local plan which address biodiversity net gain, green infrastructure and biodiversity matters (most notably policies EE9 and EE11).</p> <p>Comments regarding Strategic Environmental Assessment and Habitats Regulations Assessment are noted. The Council has produced the necessary screening statement as part of this process and consulted Natural England and the two other statutory consultees as required. The Council's screening determination is dated December 2024 and is published alongside this report.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature.</p> <p>The response also flags that SPDs require a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>		
Private individual	<p>1. The current plots on Hardwick Lane are an embarrassment to the residents of the area. If the council wants to proceed with granting more plots to this group then there needs to be some sort of agreement and conditions that the land needs to be kept tidy and that the residents cannot react angrily to officials or</p>	<p>1. Comments noted. However, no pitches along Hardwick Lane are allocated in the Runnymede Local Plan for Gypsy and Traveller use. As such, the SPD under consideration is not relevant to any applications which may come forward for new or existing developments along Hardwick Lane for Gypsy and Traveller use.</p> <p>Should it come to the Council's attention that Gypsy &amp; Traveller pitches/sites are poorly maintained, the Council's Planning</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>police that attend the plots to monitor the developments taking place on the plots.</p> <p>2. I note that plots in Virginia Water are being considered which I definitely believe is an issue and inappropriate.</p>	<p>Enforcement department hold powers to initiate formal action under Section 215 of the Town &amp; Country Planning Act, which effectively protects neighbourhoods from land or buildings adversely affecting the amenity of an area. These matters would be looked at on a case by case basis.</p> <p>2. The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of allocated pitches is not being revisited as part of the preparation of this SPD.</p>	
Private individual	<p>1. The <a href="#">Food Foundation's Food Insecurity Tracker</a> found that the number of households where children are experiencing food insecurity doubled between 2022-23. <a href="#">Friends Families and Travellers</a> are concerned about rising food poverty amongst GRT communities.</p> <p>Gypsies and Travellers living in caravans and mobile homes pay disproportionately higher energy prices, lack choice on energy use and provider and are reliant on prepayment meters. The current energy cost crisis not only compounds existing food poverty but leaves those living on caravan sites at risk of being cut off from energy supplies.</p>	<p>1/2/3- Comments noted. The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of allocated pitches is not being revisited as part of the preparation of this SPD. During the local plan process, a number of rounds of public consultation were held during which a variety of stakeholders were engaged with including Surrey County Council (who are the Education Authority for Surrey). Surrey County Council raised no objection to the proposed location of the pitches and plots allocated in the local plan.</p> <p>No pitches or plots for travellers are allocated in the ward of Egham Hythe.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>In light of this data, I find it a surprising choice to locate two sites in Egham Hythe: the most deprived area in the whole of Surrey. Councillor Rob King has given financial aid to setting up and running a food kitchen on Thorpe Road for this very reason.</p> <p>2. I am surprised that across the whole of the plan schools have only been minimally consulted: not those who would be directly impacted by educating children from GRT backgrounds.</p> <p>3. Children with GRT backgrounds can have very different needs in education and change the makeup of schools. Consideration needs to be given to how this may affect local schools in terms of their need for additional funding to support potential additional SEND needs and additional GRT training for staff to ensure that children are given the best chance to access education.</p>		
Summary of comments made by multiple	Outdated and Inadequate Evidence Base	The evidence base which underpins the Runnymede 2030 Local Plan was published in January 2018 and was considered to be up to date when the Runnymede 2030 Local Plan was scrutinised	No



Representor	Summary of comments	Response	Changes made to the SPD
representors on this matter	<p>The Council is relying on the 2017 Gypsy and Traveller Accommodation Assessment (GTAA) to justify these allocations, despite the fact this evidence is now over seven years old.</p> <p>Since 2017, over 2,150 new homes have been built in Runnymede, including at St Peter's Quarter and Homewood Grove. None of this recent population growth, infrastructure demand, or service pressure has been factored into the site selection process.</p> <p>National planning policy requires allocations to be based on up-to-date evidence. Proceeding with outdated data, particularly when the Council's own 2023 Housing Delivery Action Plan highlights infrastructure pressures, renders this plan fundamentally unsound.</p> <p>Making long-term site decisions based on outdated data is irresponsible planning.</p>	<p>through the examination in public process and when the local plan was adopted in July 2020. The Council's Gypsy and Traveller Accommodation Assessment is currently being refreshed to underpin the next iteration of the Local Plan, and is likely to be published this summer.</p> <p>The developments at Homewood Grove and St Peter's Quarter are part of allocation SL13 of the Runnymede 2030 Local Plan. The infrastructure needs and population growth arising from this allocated site was therefore factored into the Council's site selection process, cumulatively, along with all other development expected up to 2030.</p>	
Summary of comments made by multiple	Inadequate consultation with local people	When the Runnymede 2030 Local Plan was adopted in July 2020 (which included all allocated gypsy and traveller sites), according to the Council's monitoring records, units at St Peter's Quarter had	No

Representor	Summary of comments	Response	Changes made to the SPD
representors on this matter	<p>Inadequate consultation has been conducted with local communities who will be affected by these sites, with many residents living near proposed sites not directly consulted at the early stages of this plan. Local people should have been properly consulted before sites were selected.</p> <p>This is a basic failure of fair consultation, especially for families who bought homes near these sites with no warning this was coming.</p> <p>Surely by law local residents should have been consulted when purchasing our new homes.</p> <p>Despite St Peter's Quarter being directly adjacent to proposed sites, including SL6 (Pycroft Road) and SL14, SL15, SL16 (Chertsey Bittams), residents received no direct consultation or notification.</p> <p>Relying on newspaper notices and documents deposited in libraries is outdated, ineffective, and completely unrealistic in modern times — particularly for new homeowners who had no prior</p>	<p>not been completed and as such it would not have been possible for the Council to have consulted with residents about the proposed location of allocated pitches and plots at this time. The Council produced a Statement of Consultation as part of the Local Plan preparation process. This document described the various ways the Council consulted with the public about the Local Plan as it was prepared. This included a range of different activities and included digital and traditional means of communications as well as face to face drop in events at various locations across the Borough.</p> <p>The Inspector who examined the Runnymede 2030 Local Plan concluded that the Council had complied with its Statement of Community Involvement (SCI) in preparing the Runnymede 2030 Local Plan. Officers are also of the view that the SCI has been complied with in publicising this latest consultation on the Allocation Scheme SPD.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	<p>awareness these allocations were under discussion when purchasing their properties.</p> <p>This breaches the Council's own Statement of Community Involvement (2020), which requires directly affected residents to be proactively consulted and promises proactive engagement with directly affected communities. This failure makes the entire process procedurally unfair and legally vulnerable.</p>		
Summary of comments made by multiple representors on this matter	<p>Unfair Concentration of Pitches near St Peter's Quarter/in Chertsey</p> <p>The plan allocates 24 of the 35 new Traveller pitches to Chertsey — the highest concentration in any town within Runnymede. This includes the cluster of 4 sites (SL6, SL14, SL15, SL16) all located within close proximity of St Peter's Quarter and St Peter's Hospital.</p> <p>This level of clustering conflicts with the Council's own Local Plan (Policy SD1), which promotes balanced development across the borough. No justification has been provided to</p>	<p>The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of pitches is not being revisited as part of the preparation of this SPD.</p> <p>Comments made regarding infrastructure pressures are responded to elsewhere in this table.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>explain why Chertsey is bearing the overwhelming majority of new allocations</p> <p>This creates a disproportionate local impact, concentrating additional traffic, service pressure, and potential community tensions onto one small neighbourhood, while other parts of Runnymede remain unaffected.</p> <p>If the number of plots was reduced significantly, this would be more reasonable and acceptable.</p>		
Summary of comments made by multiple representors on this matter	<p>Failure to Manage Existing Sites and Unauthorised Pitches</p> <p>The Council's own evidence confirms it has struggled to manage existing Traveller sites. Officers admitted [as part of the 2018 GTAA] that:</p> <ol style="list-style-type: none"> <li>1. Existing sites are overcrowded.</li> <li>2. Licensing and enforcement are under-resourced.</li> <li>3. Unauthorised encampments are on the rise due to the lack of transit sites.</li> <li>4. Pitches are sometimes occupied by non-Travellers, reducing</li> </ol>	<p>The Council does not manage any of the traveller sites in Runnymede. Sites by and large are privately owned and maintained. Two sites in the Borough are managed by Surrey County Council. As it stands allocated gypsy and traveller sites in the Local Plan are expected to be sold to eligible traveller households directly who would then be expected to maintain them, and not acquired and managed by the Council.</p> <p>Where breaches of planning control or licensing requirements are identified, they are investigated by the Council's Environmental Health and Planning Enforcement Teams as appropriate. This would include where breaches of any occupancy conditions are identified. Action to remedy such breaches is, and will continue to be taken where this is considered to be proportionate and expedient.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>provision for the Traveller community.</p> <p>5. Existing sites suffer from unauthorised development/expansion</p> <p>6. existing traveller sites are affected by slow and inconsistent enforcement</p> <p>7. The enforcement of regulation on such sites has not historically been either robust or effective.</p> <p>8. There are waste and fly tipping issues associated with such sites</p> <p>9. The traveller community see the Council as weak and take continuous advantage of it as a result.</p> <p>Rather than addressing these known failures, the Council is proposing to expand provision without fixing the system first. This rewards past breaches of planning control and encourages further unauthorised development — a direct failure of sound planning.</p> <p>The Council has no accompanying plan to support the new allocations to improve site management, enforcement, or community</p>	<p>Recent appeal decisions in Runnymede have noted the significant and acute need for additional traveller pitches in the Borough. The allocated pitches and plots in the Local Plan seek to help address this need and help address associated issues such as overcrowding on existing sites.</p> <p>Comments about environmental concerns are responded to elsewhere in the line below.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	<p>integration. This raises serious concerns about the deliverability and sustainability of the proposed allocations.</p> <p>Residents have every right to question whether the Council can properly manage new sites when it struggles to manage the existing ones.</p>		
Summary of comments made by multiple representors on this matter	<p>Environmental Impact/concerns</p> <p>Many of the proposed sites are close to green spaces, residential areas, or countryside locations valued for their environmental quality.</p> <p>Poorly managed sites can harm local environments through:</p> <p>Increased waste.</p> <p>Noise pollution.</p> <p>Vehicle-related damage to local wildlife areas.</p> <p>-Flood Risk &amp; Ecological Impact Several allocated sites, including Pyrcroft Road, Thorpe Lea Road,</p>	<p>The Council's Site Selection Methodology &amp; Assessment (SSMA) which supported the 2030 Local Plan, which is the document which allocates the pitches/plots, not this SPD, found the locations for sites/plots to be suitable. The SSMA was scrutinised during the examination of the 2030 Local Plan and found to be robust. Further, the 2030 Local Plan itself was subject to Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) including the sites allocating gypsy/traveller pitches and found to have no significant effect subject to mitigation set out in the Local Plan.</p> <p>Sites at Pyrcroft Road, Thorpe Lea Road and Chertsey Bittams are partially within flood zones 2 or 3 but there are areas of these sites which are free from flood risk where pitches/plots are able to be located. The Environment Agency and Surrey County Council (the latter in their role as lead local flood authority) were key consultees during the preparation of the Local Plan and neither objected to the relevant allocations containing traveller pitches on flood risk grounds (including surface water flooding).</p>	No

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	<p>and Chertsey Bittams, are within Flood Zones 2 and 3, meaning they are at high risk of flooding. According to national planning policy, highly vulnerable developments, including caravan sites, are not suitable in these areas.</p> <p>Furthermore, the Strategic Environmental Assessment (SEA) screening determination has not adequately assessed the full environmental impact. These sites are in close proximity to designated green spaces and protected habitats. The increased development could lead to:</p> <ul style="list-style-type: none"> <li>•Loss of biodiversity and green belt intrusion</li> <li>•Increased surface water runoff, exacerbating local flooding issues</li> <li>•Disruption to local wildlife corridors</li> </ul> <p>Concerns about the increased traffic from traveller developments causing pollution.</p>	<p>A flood risk assessment and drainage strategy will be required as part of the detailed planning application for the majority of sites as set out in 2030 Local Plan policies, and the Environment Agency and Surrey County Council are consulted where the developments meet their thresholds for consultation.</p> <p>In response to comments made about loss of biodiversity/ disruption to local wildlife corridors/loss of green belt, planning applications for major developments submitted after February 2024 (all of the allocated sites in the Local Plan would be classified as major developments) would need to deliver a 10% biodiversity net gain (BNG) and the allocation policies require net gains in biodiversity. This will require submission of ecological reports. None of the allocated sites in the Local Plan are located within the Green Belt.</p> <p>Air quality modelling was carried out to support the Local Plan which factored in the growth expected over the local plan and the anticipated traffic movements (and associated traffic flow data). This work concluded that no exceedences of any relevant Air Quality Objectives were predicted at any locations across Runnymede as a result of anticipated growth over the Plan period. This reflected a large decrease in NO2 concentrations arising from reductions in traffic exhaust emissions due to predicted improvements in engine technology.</p> <p>Please see response on site management and enforcement elsewhere in this table.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	Council urged to provide updated flood risk assessments and ecological impact reports before proceeding with any site allocations.		
Summary of comments made by multiple representors on this matter	<p>No Transit Site to Address Unauthorised Encampments</p> <p>The GTAA 2018 and Council officers themselves highlighted the lack of transit sites in Runnymede as a direct cause of unauthorised encampments. However, this plan provides no transit site provision at all, meaning the underlying issue is completely unaddressed.</p>	The need for additional Gypsy/Traveller plots and pitches including transit sites was considered through the 2030 Local Plan examination. None are provided for within the Local Plan as the 2018 Gypsy and Traveller Accommodation for the borough states in paragraph 7.41 that, <i>'Whilst there is some evidence of a number of unauthorised encampments in Runnymede in recent years, it is recommended that there is currently no need to provide any new transit pitches'</i> .	No
Summary of comments made by multiple representors on this matter	<p>Enforcement &amp; Residency Controls – Lack of Monitoring &amp; Accountability</p> <p>There is no clear enforcement mechanism to ensure:</p> <ul style="list-style-type: none"> <li>• Families do not overstay beyond the intended period (in the case of transit sites).</li> <li>• Residents do not sublet pitches or use them for unauthorised commercial activity.</li> </ul>	<p>No transit sites are allocated through the local plan for the reason described above. All new pitches are permanent in nature so there would be no temporary occupation period that would subsequently expire.</p> <p>The Allocation Scheme confirms that pitches are able to be sub let in the same way that a private homeowner is able to sub let their homes (paras 3.14 of the SPD). Investor buyers are therefore possible. Para 3.15 of the SPD confirms that if anyone involved in the purchase or rental of one of the allocated pitches and plots needs to check whether they meet the Council's eligibility criteria, they should contact the Council for more information. The eligibility form will also be available to fill in on the Council's website.</p>	No



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	<ul style="list-style-type: none"> <li>• Individuals who move on are not returning to the same sites repeatedly, making enforcement ineffective.</li> </ul> <p>Without proper tracking and regulation, the proposed sites could lead to:</p> <ul style="list-style-type: none"> <li>• Unauthorised encampments becoming permanent due to poor enforcement.</li> <li>• Speculative purchase and resale of Traveller plots by non-Traveller buyers.</li> <li>• Repetitive legal disputes and clearance costs to taxpayers.</li> </ul> <p>Request: The council must outline a detailed enforcement framework, including:</p> <ul style="list-style-type: none"> <li>• A strict residency verification process.</li> <li>• A mechanism to track individuals moving on and returning.</li> <li>• Fines or penalties for violations of site terms.</li> </ul>	<p>The SPD is not intended to set out a long-term strategy for site management, and furthermore, this would not be supplementary to the part of policy SL22 that the SPD seeks to provide further amplification on.</p> <p>In relation to the management of the allocated pitches and plots, these are expected to be sold as freehold or leasehold properties to gypsy and traveller households in the same way that developers sell bricks and mortar housing. The households who acquire the pitches/plots would be responsible for maintaining their properties in the same way as the households who buy houses on the allocated sites. Management agreements will be in place for the wider allocated sites to maintain the communal areas. These agreements are generally handed over to a third party by the developer.</p> <p>It is possible that an affordable housing provider/third party provider could take on some of the traveller pitches and rent them out to members of the travelling community. In this instance, any rental agreements between these parties I am sure would set out the expectations for how the pitch should be kept.</p> <p>Should it come to the Council's attention that Gypsy &amp; Traveller plots/sites are poorly maintained, the Planning Enforcement department hold powers to initiate formal action under Section 215 of the Town &amp; Country Planning Act, which effectively protects neighbourhoods from land or buildings adversely affecting the amenity of an area. These matters would be looked at on a case by case basis.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	<p>The Allocation Scheme does not set out a long-term strategy for site management.</p> <p>Residents need clear guarantees about:</p> <p>How site rules will be enforced.</p> <p>How unauthorised expansion will be prevented.</p> <p>What happens if sites are poorly maintained.</p>	<p>In relation to concerns about occupation of the pitches by non travellers, the Allocation Scheme SPD confirms at paragraph 3.1 that given that the allocated pitches/plots are restricted exclusively for the use of the Gypsy/Traveller/Showpeople communities, a planning condition will be attached to the relevant planning consents for the allocated sites to ensure that they cannot be occupied by any other types of household.</p> <p>Any breaches of planning control, including unauthorised commercial activity, the unauthorised expansion of pitches or breach of occupancy conditions would be investigated by the Council's Planning Enforcement Team.</p> <p>In relation to comments about a strict verification process being needed, paragraph 3.4 of the SPD confirms that an eligibility form will be produced by the Council for those who are interested in acquiring one of the allocated pitches/plots. This form will be designed to gather information to help the Council assess whether individuals/households meet the planning definition of a traveller and whether an individual has a local connection to the borough (where required in line with subsequent text in para 3.12 of the SPD).</p>	
Summary of comments made by multiple representors on this matter	<p>Contradiction Between Council's Financial Interests and Planning Decisions</p> <p>The Council has benefited financially from promoting St Peter's Quarter as a desirable, high-quality residential area, collecting Council</p>	<p>All new residential developments in the borough which fall under use class C3 are required to provide monies to fund infrastructure to support growth (either through Section 106 agreements or Community Infrastructure Levy depending on when the development was granted). There are no allocated gypsy and traveller sites immediately adjacent to this development. The location of all proposed allocated developments (for employment, houses and gypsy and traveller development was considered on</p>	No

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	<p>Tax and developer contributions (CIL) from the development.</p> <p>It is completely contradictory for the Council to now undermine the value and desirability of these homes by allocating Traveller pitches immediately adjacent — especially without any proper consultation with the new residents who have invested their life savings into these properties.</p>	<p>both a site by site basis and in the round as part of the examination of the Runnymede 2030 Local Plan and the Inspector examining the Local Plan concluded that the distribution of development was sound.</p> <p>A response on the points raised about impacts on property values and adequacy of consultation is provided elsewhere in this table.</p>	
Summary of comments made by multiple representors on this matter	<p>Procedural Failure and Lack of Transparency</p> <p>The first consultation on the draft Allocation Scheme took place in late 2021, after contracts were exchanged on many homes within St Peter's Quarter.</p> <p>There was no reference to these allocations in the original Local Plan documents or the evidence base available to Cala Homes and buyers in 2020/21.</p> <p>This creates a clear procedural unfairness, where new residents were excluded from key decisions</p>	<p>It is the 2030 Local Plan which allocates pitches for Gypsy/Travellers not this SPD. The first round of public consultation on the 2030 Local Plan was undertaken in 2016 and subsequent consultations took place in 2017 and again in 2018. During the 2017 &amp; 2018 consultations it was made clear which housing allocation sites would require the provision of Gypsy/Traveller pitches. The adopted Local Plan has been published on the Council's website since its adoption on 20<sup>th</sup> July 2020. This clearly shows the location of proposed development in the borough and what uses are to come forward on each site.</p> <p>The Council's site capacity work which formed part of the evidence underpinning the 2030 Local Plan identified Gypsy/Traveller pitches on allocation sites.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	directly impacting their investment and quality of life.		
Summary of comments made by multiple representors on this matter	<p>Procedural and Legal Vulnerability</p> <p>Bullet points related to outdated evidence, poor consultation, unfair site clustering, enforcement failures, and financial contradictions — render this Allocation Scheme procedurally flawed, unjustified, and legally unsound.</p>	This statement is disagreed with for the reasons set out elsewhere in this table in the Council's responses to the more detailed points raised about each of these listed issues.	No
Summary of comments made by multiple representors on this matter	<p>Cumulative Infrastructure Pressure/Strain Ignored</p> <p>SD5 of the adopted Local Plan 2030 states that new development should only proceed if there is sufficient infrastructure capacity. The Council's own 2023 Housing Delivery Action Plan highlights growing pressure on schools, healthcare, and transport infrastructure. Despite this, the Allocation Scheme contains no evidence that the combined impact of recent housing delivery and new Traveller pitches has been assessed. The failure to carry out this assessment makes the plan technically unsound. Rather than</p>	<p>Relevant proposals will be assessed against policy SD5 of the local plan. Any identified conflict with this policy is likely to result in a refusal of planning permission.</p> <p>The Allocation Scheme SPD is only intended to provide additional guidance which is supplementary to a discreet part of Policy SL22 of the Local Plan which relates to the allocated gypsy and traveller pitches and plots (this wider policy is concerned with Meeting the Needs of Gypsies, Travellers and Travelling Showpeople). The relevant part of the policy seeking to be elaborated on is set out in paragraph 2.2 of the Allocation Scheme SPD. The SPD is not intended to set out evidence around the combined impact of recent housing delivery and new traveller pitches, and furthermore, this would not be appropriate as this would not be supplementary to the part of policy SL22 that the SPD seeks to provide further amplification on. In any event, the number and location of Gypsy/Traveller pitches were proposed through the 2030 Local Plan not this SPD. The 2030 Local Plan was underpinned by infrastructure evidence which included all additional housing in</p>	No

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	<p>addressing these known issues, the Council proposes to expand provision near St Peter's Quarter</p> <p>St Peter's Quarter, along with other nearby developments, has already placed significant strain on:</p> <ul style="list-style-type: none"> <li>-GP surgeries/hospitals</li> <li>-Schools</li> <li>-Roads and parking</li> <li>-Facilities in the communities</li> <li>-Waste services</li> </ul> <p>Adding Traveller and Showpeople pitches, with their distinct needs and larger vehicles, will only exacerbate these pressures.</p> <p>Before any sites are approved, the council must provide a full impact assessment on local infrastructure and a mitigation plan to address these concerns.</p> <p>No new investment in local infrastructure has been promised alongside these allocations.</p> <p>When there are already grave issues in essential services money should be spent in this area.</p>	<p>Runnymede to 2030 including the number of pitches allocated through the Local Plan. As such, regard has already been had to the impact on infrastructure from the allocations in the 2030 Local Plan.</p> <p>The Council's <a href="#">Annual Monitoring Reports</a> monitor both housing delivery and infrastructure provision since the commencement of the plan period.</p> <p>The Local Plan policies which allocate housing sites set out the infrastructure required to bring these sites forward. The impacts on infrastructure will also be a consideration at detailed planning application stage. The Council uses Community Infrastructure Levy (CIL) as the key vehicle to deliver infrastructure improvements in the Borough except for 'critical' infrastructure (including repayment of the Government grant for A320 &amp; M25 J11 improvements) and/or physical provision which will continue to be secured through Section 106 and/or Section 278 agreements in order to ensure that development is acceptable in planning terms.</p> <p>In response to comments that traveller sites require adequate drainage, waste disposal, and access to clean water, appendix 5 of the Council's <a href="#">Runnymede Design Supplementary Planning Document</a> (SPD) provides guidance on how traveller sites should be designed. This set out that key considerations for site layout include (amongst other things) 'infrastructure, e.g. water and electricity supply, surface water and storm drainage, lighting and waste disposal arrangements'. The Runnymede Design SPD is a material consideration in the determination of planning applications.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	Traveller sites require adequate drainage, waste disposal, and access to clean water. Many of these allocated sites do not appear to have the necessary infrastructure in place.		
Summary of comments made by multiple representors on this matter	<p>Emergency Access and Public Health Risk</p> <p>St Peter's Hospital relies on clear access routes for ambulances and emergency vehicles. Large vehicles, trailers, and potential site traffic from new pitches would compromise emergency access. This risk to public safety is entirely absent from the Allocation Scheme.</p>	<p>As set out elsewhere in these responses, the SPD is only seeking to provide amplification on a small part of policy SL22 of the local plan. Additional guidance around risks to public safety would not supplement the part of the policy being considered and as such would not be appropriate.</p> <p>However, as part of the preparation of the Runnymede 2030 Local Plan, Surrey County Council in their capacity as the Highway Authority was consulted and raised no objection to any of the allocated sites on highway safety grounds subject to highway improvement works along the A320 corridor between Ottershaw and Chertsey. These works are taking place to support the development coming forward in the local plan and to ensure that it does not have an unacceptable impact on either the Chertsey Ambulance Station or St Peters Hospital from a highway perspective. More information about the A320 highway improvement scheme can be viewed <a href="#">here</a>.</p> <p>Detailed proposals for access arrangements are provided as part of individual planning applications and considered by the Highway Authority on a case by case basis.</p>	No
Summary of comments made by multiple representors on this matter	<p>Health Service Impact Ignored</p> <p>The GTAA acknowledges higher health and welfare needs within the Traveller and Showpeople</p>	Ashford and St Peters Hospitals NHS Foundation Trust and other healthcare stakeholders were engaged with extensively during the preparation of the Runnymede 2030 Local Plan and raised no objection to any of the allocated sites proposed, including the Gypsy and Traveller sites. Consulting with healthcare providers	No

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	<p>communities. Despite this, the Council has not planned for expanded healthcare provision, expecting St Peter's Hospital and local GP surgeries to absorb this demand, even though they are already under strain.</p> <p>Local health services are already stretched both in primary/community and Acute provision with local social care provision struggling to meet current demand.</p>	<p>from the earliest stages of plan preparation is in line with best practice and allows infrastructure providers with the maximum amount of time to plan for an increased population. Healthcare providers have the opportunity to apply for CIL funds collected by the Council for healthcare infrastructure. Based on the feedback of healthcare providers, a new GP surgery is planned as part of the allocation at the Ottershaw East site.</p>	
Summary of comments made by multiple representors on this matter	<p>Road safety and traffic concerns</p> <p>Traveller and Showpeople sites typically require access for large vehicles, caravans, and machinery. The local roads were never designed to handle large vehicles and trailers associated with Traveller pitches. Many of the proposed locations are near residential roads not built to handle this kind of traffic. This will directly increase/create safety risks for local families, particularly children walking and cycling to school.</p>	<p>As part of the preparation of the Runnymede 2030 Local Plan, Surrey County Council in their capacity as the Highway Authority was consulted and raised no objection to any of the allocated sites on highway safety grounds. Detailed proposals for access arrangements are provided as part of individual planning applications and considered by the Highway Authority on a case by case basis.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
Summary of comments made by multiple representors on this matter	<p>Damage to Property Values and Confidence</p> <p>Families who purchased in St Peter's Quarter paid premium prices for a desirable residential environment. The surprise imposition of permanent Traveller pitches risks damaging property values, with the Council's failure to disclose this at point of sale being a key contributor.</p> <p>Concern about the impact of the proposals on property values, as the introduction of Traveller pitches so close to a new residential development is likely to have a negative effect. Homeowners have invested significant amounts into their properties, and this proposal disregards the financial well-being of existing residents. The council should be supporting local homeowners rather than devaluing their investments.</p> <p>An uncomfortable statistical fact is property prices, where GTTS communities have been introduced, is known to put off buyers into an area, resulting in reduced</p>	<p>The impacts on house prices as a result of development is outside of the scope of the planning system. As such it has not been a material consideration in the plan making process.</p> <p>As part of the purchase of a property in St Peter's Quarter, a purchaser's solicitor would have requested a local land search from the Council. Planning information contained in local searches is only given for the specific site being searched (the site edged in red as provided on the customer's plan), unless a solicitor has requested a larger area search of planning applications, which would be an additional enquiry they would pay extra for.</p> <p>The published 2030 Local Plan clearly identifies which sites will be allocated Gypsy/Traveller pitches. The sites with pitches allocated were also consulted on as part of 2030 Local Plan preparation in 2017 &amp; 2018. The local plan was adopted in July 2020 and Gypsy and traveller allocations were set for the borough at this point in time.</p> <p>For those buying properties after July 2020 (when the Local Plan was adopted), the Local Plan has been available to view on the Council's website from the date of its adoption which clearly shows the location of allocated sites and wider growth plans for different parts of the borough. Prior to this, the draft local plan which was submitted to the Secretary of State for public examination was published on the website from Summer 2018 (although some modifications were then made to the draft document prior to its adoption following feedback from the appointed Inspector and a Main Modifications public consultation).</p>	No



Representor	Summary of comments	Response	Changes made to the SPD
	<p>demand/pricing and more local resentment and tension.</p> <p>When homes were purchased 2 years ago this proposal did not come up in local searches and we have not received anything from the council subsequently. This issue has only now been raised through our residents committee. I therefore feel there has been a failure of disclosure and a lack of public consultation for potentially impacted parties.</p> <p>This is a clear breach of legitimate expectation, as buyers reasonably rely on the published Local Plan and public consultation records available at the time of purchase. The failure to align site allocations with housing delivery means both Cala homes and its buyers were misled by omission, creating a situation that is unfair and procedurally flawed.</p> <p>At the time of purchase, neither the Council nor Cala Homes were aware of the specific pitch allocations now being proposed near our development. This is because the first public consultation</p>	<p>Points about transparency and adequacy of public consultation about the location of allocated sites is further considered elsewhere in this table.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	<p>on this scheme took place after my purchase was completed. Buyers cannot make informed decisions about investments when crucial planning changes are withheld until after transactions complete. Buyers were misled by omission, and were denied the chance to make informed decisions about investing in this area.</p> <p>Residents invest their savings into homes expecting a certain environment and local character.</p>		
Summary of comments made by multiple representors on this matter	<p><b>Flawed Site Selection Process</b></p> <p>The Allocation Scheme does not demonstrate that less disruptive alternatives were meaningfully explored, such as Brownfield land and locations further from critical infrastructure/more rural locations with less infrastructure pressure.</p> <p>There are alternatives such as spreading small pitches across the borough instead of concentrating sites near residential areas.</p> <p>Residents have a right to demand transparent, evidence-based site</p>	<p>The site selection process which informed the location of the allocated sites in the Runnymede 2030 Local Plan (including gypsy and traveller sites) was carried out during plan preparation. The Inspector examining the Local Plan concluded that the Council's approach to site selection was robust and fit for purpose.</p> <p>The location of the allocated gypsy and traveller pitches is not being revisited as part of this SPD.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>selection — which hasn't happened here.</p> <p>This raises serious concerns over fairness and objectivity.</p> <p>The Allocation scheme does not appear to adequately demonstrate the Options Appraisal undertaken to reach the choice of sites.</p>		
Summary of comments made by multiple representors on this matter	<p>Summary of concluding comments made in a number of the letters received:</p> <p>Taken together, these issues show that the Allocation Scheme is:</p> <p>Procedurally unfair/flawed/unjust due to poor consultation and outdated evidence.</p> <p>In conflict with the Local Plan's spatial strategy and infrastructure policies.</p> <p>Operationally risky due to known management failures.</p> <p>Undermining the Council's own regeneration vision for Chertsey.</p>	For the reasons noted in in the responses to detailed points in the lines above, the Council is of the view that the Gypsy, Traveller and Travelling Showpeople Allocation Scheme SPD can continue to adoption.	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>Strategy based on outdated evidence</p> <p>Representors therefore formally object to the plan and urge the Council to:</p> <p>Pause the Allocation Scheme immediately.</p> <p>Commission a new Gypsy and Traveller Accommodation Assessment (GTAA) that reflects current housing delivery, population growth, and infrastructure capacity.</p> <p>Ensure that directly affected residents are proactively consulted.</p> <p>Demonstrate that existing sites are properly managed and enforced before any further provision is made.</p> <p>Explore more appropriate, less harmful locations.</p> <ul style="list-style-type: none"> <li>• Reassess site allocations based on current, accurate evidence and fair consultation with directly affected residents.</li> </ul>		

Representor	Summary of comments	Response	Changes made to the SPD
	<ul style="list-style-type: none"> <li>Ensure the plan complies fully with national planning policy requirements for up-to-date evidence, procedural fairness, and soundness.</li> </ul> <p>This matter requires urgent attention to restore fairness, transparency, and proper governance.</p>		
Summary of comments made by multiple representors on this matter	<p>Creates Division Instead of Integration</p> <p>Poorly planned, poorly consulted schemes like this fuel division between settled and Traveller communities.</p> <p>Proper planning should focus on positive integration, supported by investment in services, not forcing sites into communities with no consultation.</p>	<p>As set out in responses elsewhere in this table, a significant amount of public consultation was undertaken by the Council during the preparation of the Runnymede 2030 Local Plan. This included consultation not only with the general public (including gypsies and travellers (and groups who represent them)) but also other stakeholders. A detailed evidence base was prepared to underpin the Plan including site selection evidence, and evidence related to housing needs and infrastructure. The Local Plan was examined independently by an experienced planning inspector appointed by the Secretary of State who concluded that the Plan prepared by the Council met all legal requirements and was consistent with national planning policy.</p> <p>Allocating small numbers of permanent pitches on wider residential led housing allocations which are close to existing facilities is intended to assist with the positive integration described by the representor.</p>	No
Summary of comments made by multiple representors on this matter	<p>Contradiction with Chertsey's Regeneration Vision.</p> <p>The Council's own Local Plan promotes Chertsey as a focus for high-quality residential development</p>	<p>The Local Plan's spatial strategy has been assessed to be sound and the local plan has been adopted for almost 5 years. The Council has provided additional design guidance for new traveller developments in the Runnymede Design SPD to help ensure appropriate integration from a design perspective with other forms of development.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	and regeneration. Developments like St Peter's Quarter were directly supported by the Council to attract residential investment and create a cohesive, high-quality community. Placing multiple Traveller pitches immediately next to this new development directly undermines this vision. The visual impact, design contrast, and lack of proper integration planning runs directly against the Council's own regeneration policies.		
Summary of comments made by multiple representors on this matter	<p>Inefficient Use of Land.</p> <p>Government design guidance recommends Traveller pitches should each be around 500 square metres — larger than many of the house plots in St Peter's Quarter. This is a very low-density use of valuable land, particularly in a borough where 79% of land is already protected as Green Belt. This inefficient land use has not been justified within the Allocation Scheme.</p>	The location and distribution of gypsy and traveller pitches has already been agreed as part of the local plan and is not being revisited as part of this SPD. Whilst it is true that gypsy and traveller pitches are a lower density land use, Government policy is clear that Local Planning Authorities should make their own assessment of need for the travelling community for the purposes of planning and should seek to increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply (Planning Policy for Traveller Sites, point 4). This necessitates making provision in the Borough for this lower density form of development.	No
Summary of comments made by multiple	Lack of Cross-Border Cooperation.	The Council's compliance with national requirements related to the Duty to Cooperate (DtC) on strategic cross boundary matters was extensively considered during the examination of the 2030 Local	No

Representor	Summary of comments	Response	Changes made to the SPD
representors on this matter	The GTAA 2018 confirms that neighbouring councils refused to assist Runnymede in meeting Traveller accommodation needs, citing similar constraints. Despite this, there is no evidence of further engagement or regional planning since 2017, even though the Duty to Cooperate is a legal requirement under the Localism Act 2011.	Plan. The Inspector examining the Local Plan considered that RBC had passed the DtC. The Council continues to work positively with neighbouring local authorities and other Duty to Cooperate bodies on a range of strategic cross boundary matters.	
Summary of comments made by multiple representors on this matter	<p>Concerns about crime and anti social behaviour</p> <p>Existing issues associated with travellers including but not limited to:</p> <ul style="list-style-type: none"> <li>-Littering</li> <li>-Theft</li> <li>-Antisocial behaviour</li> <li>-Aggression/threatening behaviour</li> <li>-Harrassment</li> <li>-Mistreating of animals</li> <li>-Flytipping</li> <li>-Noise/creating disturbances</li> <li>-Purposely blocking the road with unsafe parking</li> <li>-Some local businesses already have issues with the gypsy and traveller community.</li> </ul>	<p>Comments noted, however, paragraph 63 of the NPPF sets out that the Council is required ensure that the, <i>'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'</i>.</p> <p>Following such an assessment, the Planning Policy for Traveller Sites (PPTS) confirms in paragraph 3 and 4 that: <i>The Government's overarching aim is to ensure 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. 4. To help achieve this, the Government's aims in respect of traveller sites are (amongst other things):</i></p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>The police and authorities seem unable to reduce the incidence of at least some of these crimes - which obviously results in bad feelings and actual fear for residents who wish to use community facilities.</p> <p>Concerns expressed about the proposals in the following areas</p> <ul style="list-style-type: none"> <li>-Community safety</li> <li>-Community cohesion</li> <li>-Dumping of waste</li> <li>-Gypsies and travellers not wanting to integrate with existing communities</li> <li>-There being a lack of trust between the travelling and settled community</li> <li>-A potential rise in crime and antisocial behaviour</li> </ul> <p>Existing issues in these areas need to be dealt with first before more new sites are permitted. The Allocation Scheme does not outline any additional security measures to prevent such issues.</p> <p>Gypsies and travellers should be allocated sites at suitable locations, away from established village communities, where they can live how they wish without causing</p>	<p><i>b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.</i></p> <p>The Council assessed the accommodation needs of all the groups referred to above during the preparation of the Runnymede 2030 Local Plan (with the exception of looked after children as this additional requirement was only added to the NPPF in December 2024) and the Local Plan strategy was developed on this basis.</p> <p>The number and location of the gypsy and traveller pitches allocated in the local plan was agreed as part of the Runnymede 2030 Local Plan and the locations were considered acceptable by the Inspector who examined the local plan. The location and number of pitches allocated are not being revisited as part of this SPD.</p> <p>Whether or not the Council chooses to acquire the allocated pitches is not a matter for consideration in this SPD but a wider corporate decision. Officers in the Planning Policy Team have made the Council's Housing and Assets Regeneration Teams aware of this request. Notwithstanding this, the section 106 agreements for all of the allocated sites include a clause which requires developers to offer the allocated pitches to the Council for potential purchase if they have not been able to sell them to the travelling community during the specified marketing period.</p> <p>Surrey Police unsubscribed from the Council's Planning Policy database in August 2024 and have not added a new contact since this time. As such, Surrey Police has not been contacted during this current period of consultation. The Police is not one of the specified consultees who the Council is required to consult with during the preparation of a Local Plan but would have been able to</p>	



Representor	Summary of comments	Response	Changes made to the SPD
	<p>disturbance, destruction and fear to those pursuing a traditional way of life.</p> <p>Alternatively, if the planned pitches are still to be allocated, they MUST remain owned and managed by Runnymede Borough Council. Additional policing plans must be devised and funding found to ensure long term security of the peaceful local environment - all of which must be agreed with existing residents and at no additional cost to them via Council Tax or any other means.</p> <p>Runnymede Borough Council and Surrey County Council have a duty of care towards existing residents, to preserve the traditional and peaceful way of village life - and this cannot be jeopardised in order to accommodate cultures who do not hold the same values.</p> <p>Query whether Surrey Police have been consulted on the new RBC policies.</p>	<p>respond to any of the consultations during the plan preparation period, or add themselves to the Council's planning policy database at any time. There is no record of Surrey Police responding to any of the consultations on the Runnymede 2030 Local Plan.</p> <p>The Council's Runnymede Design SPD provides some commentary on how new developments can be designed to help reduce the actual likelihood or fear of crime, for example by creating opportunities for natural surveillance.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
Private individual	I feel the opportunity to improve integration of the two communities is brave and useful.	Comments noted.	No
Private Individual	<p>In terms of the pitches themselves, the general feeling amongst residents/members of the Residents Associations I represent is that they should NOT be sold to the GRT community - they should be in ownership and control of the Local Authorities. This permits higher levels of control than would otherwise be possible. Perhaps after a 5-year period of compliance with rules and laws of the land, transfer of ownership to occupant could be considered?</p> <p>The draft policies I have seen from RBC suggest ownership will, in fact, unfortunately be immediately passed to eligible GRT community members. If that remains true, one of the most important eligibility requirements of an applicant is a demonstrable willingness to abide by the rules of the UK - the first of which is that the individuals pay their taxes and dues. So emphasis on valid P45 forms from the prospective owners should be of prime importance. A strong</p>	<p>Whether or not the Council chooses to acquire the allocated pitches is not a matter for consideration in this SPD but a wider corporate decision. Officers in the Planning Policy Team have made the Council's Housing and Assets Regeneration Teams aware of this request. Notwithstanding this, the section 106 agreements for all of the allocated sites include a clause which requires developers to offer the allocated pitches to the Council for potential purchase if they have not been able to sell them to the travelling period during the specified marketing period.</p> <p>Matters related to whether individuals correctly pay their taxes is not a material planning consideration. It can be confirmed that permanent pitches (like those allocated in the Local Plan) being occupied by someone as their sole or main residence, are liable for Council Tax.</p> <p>Where interested purchasers are seeking to demonstrate a local connection on the grounds of employment, the Allocation Scheme confirms that <i>historic (at least 12 months old) and current P45 or Payslip demonstrating the individual's (or for the permanent adult member of the family who is seeking to demonstrate the employment link) address(es) of employment will be required.</i></p> <p>In relation to the comment made about resales, following the adoption and implementation of the Allocation Scheme SPD, it is intended that the local connection criteria will be appended to the section 106 agreements for the developments containing allocated pitches and plots for gypsies and travellers. The local connection requirements will then apply to the land regardless of change in</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>connection to Runnymede is also important (which I have seen is included in draft RBC policy).</p> <p>What I did NOT see is an ability for RBC to exert same control and checks when a GRT pitch is re-sold. This is vital.</p> <p>Other residents fear the expansion of the pitch allocations by the GRT community buying up adjacent properties and creating a no-go area within housing developments. These fears gain validity when compared to existing GRT community residences.</p> <p>Strong monitoring and, if necessary, control of this experiment for first 5-10 years is very important. This falls on RBC and the Surrey Police to buy into in a defined manner.</p>	<p>ownership. Paragraph 3.8 of the Allocation Scheme SPD sets out that as part of the Gypsy and Traveller Scheme produced by developers, one matter that should be dealt with is for developers to provide, 'confirmation of how prospective purchasers will be made aware of the restrictions on the occupation of the pitches/plots to inform future re sales/sub lets'. Paragraphs 3.1 and 3.2 of the SPD also set out that given that the allocated pitches/plots are restricted exclusively for the use of the Gypsy/Traveller/Showpeople communities, a planning condition will be attached to the relevant planning consents for the allocated sites to ensure that they cannot be occupied by any other types of household. Model wording for this condition is included.</p> <p>In line with Policy SL22, individuals interested in acquiring/renting one of the allocated pitches or plots will need to demonstrate that they (or a permanent member of their household) meet the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS), or any replacement guidance). Again, such conditions apply to the land regardless of change in ownership.</p> <p>Where breaches of planning control are identified, they are investigated by the Council's Planning Enforcement Team as appropriate. Action to remedy such breaches is, and will continue to be taken where this is considered to be proportionate and expedient.</p> <p>It is considered to be discriminatory to apply an enhanced monitoring regime to the pitches allocated in the local plan when contrasted to other forms of developments owned by non travellers. The Council does however visit all of the traveller sites</p>	

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		in the borough twice annually as part of the national caravan count.	
Private Individual	I am concerned about RBC allocating more GRT pitches in Runnymede, in particular the Thorpe Lea Road and Thorpe Lea Road West plots.	The SPD does not allocate any additional Gypsy/Traveller pitches then already set out in the 2030 Local Plan. The location of allocated pitches is not being reconsidered as part of this SPD.	No
Private individual	Query whether Virgina Water and Weybridge are taking their fair share.	Virginia Water South allocation identifies 2 pitches. Weybridge is within Elmbridge BC not RBC.	No
Summary of comments made by multiple representors on this matter	<p>I would like to know who pays for these pitches and the administration required by the council.</p> <p>I do not agree that any money paid by local residents should be used for the above purpose.</p> <p>Why should the traveller community be given free land when everyone else has to work for it and pay tax at the same time?</p> <p>Why should they get free housing and land when there are so many homeless ex -servicemen who have given more to society ?</p>	<p>The pitches and plots which are allocated through the Runnymede 2030 local plan are expected to be sold as freehold or leasehold properties to gypsy and traveller households in the same way that developers sell bricks and mortar housing, the community are not given the land for free. In relation to the cost of administering the Allocation Scheme, this will be undertaken by the Planning Department as part of their existing annual budget.</p> <p>The Council is funded in a number of ways and unless specific to a service (i.e. fees &amp; charges, rents, specific grant) income from council tax, business rates or general government grant is not specifically allocated to services but funds the remaining shortfall.</p>	No

Representor	Summary of comments	Response	Changes made to the SPD
Private individual	If this proposal goes through it shows Surrey as an easy target for other travellers across the British Isles.	<p>All local authorities across England are required to comply with national policy in the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS).</p> <p>Paragraph 63 of the NPPF sets out that the Council is required ensure that the, <i>'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'</i>.</p> <p>Following such an assessment, the Planning Policy for Traveller Sites (PPTS) confirms in paragraph 3 and 4 that: <i>The Government's overarching aim is to ensure 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. 4. To help achieve this, the Government's aims in respect of traveller sites are (amongst other things):</i></p> <p><i>b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.</i></p>	No
Private Individual	When there is a well-publicised severe shortage of housing across the country it is my view that any available land in our borough should be used for permanent affordable	See comments in line above about the requirements of national policy to provide land for housing for a range of different groups. This includes those who require affordable housing.	No

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	housing not temporary buildings used by the traveller community.		
National Highways	<p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M25 and M3.</p> <p>The consultation is seeking views on the pitch and plot allocations for gypsies and travellers. We have examined the draft SPD and note that the content is in line with Policy SL22 of the adopted Local Plan. Furthermore, the SPD covers a total of 10 plots and 35 pitches.</p> <p>Given the number of plots and pitches we are satisfied that its outcome will have no effect upon the safe and efficient operation of the SRN. Therefore we have no</p>	Comments noted	No

Representor	Summary of comments	Response	Changes made to the SPD
	comments to make through this consultation.		
Private individual	<p>At a time when resources are so low for RBC it's ludicrous that this is being prioritised versus essential services that are used by all residents.</p> <p>I pay the highest rate of council tax and want to see RBC spending funds on attracting more investment, business and families to the area where there is a clear return of investment. Schemes like this divide the community and drive tax payers away from living here.</p>	<p>Providing pitches and plots for the travelling community is not being prioritised over the provision of infrastructure. All local authorities across England are required to comply with national policy in the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS).</p> <p>Paragraph 63 of the NPPF sets out that the Council is required ensure that the, <i>'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes'</i>.</p> <p>Following such an assessment, the Planning Policy for Traveller Sites (PPTS) confirms in paragraph 3 and 4 that: <i>The Government's overarching aim is to ensure 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. 4. To help achieve this, the Government's aims in respect of traveller sites are (amongst other things):</i></p> <p><i>b. to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.</i></p>	No

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		<p>The Council uses Community Infrastructure Levy (CIL) as the key vehicle to deliver infrastructure improvements in the Borough except for 'critical' infrastructure (including repayment of the HIF grant for A320 &amp; M25 J11 improvements) and/or physical provision which will continue to be secured through Section 106 and/or Section 278 agreements in order to ensure that development is acceptable in planning terms. Information on infrastructure delivered to date in the Borough over the local plan period can be found in the Council's Infrastructure Delivery Schedules (IDS). The latest IDS can be viewed at: <a href="#">Infrastructure Delivery Schedule 2025-2030 FINAL</a> .</p>	
Private Individual	<p>No Clear Long-Term Plan for site management</p> <p>The Allocation Scheme does not set out a long-term strategy for site management.</p> <p>Residents need clear guarantees about:</p> <p>How site rules will be enforced.</p> <p>How unauthorised expansion will be prevented.</p> <p>What happens if sites are poorly maintained</p>	<p>The Allocation Scheme SPD can only provide additional guidance which is supplementary to Policy SL22 of the Local Plan which is concerned with Meeting the Needs of Gypsies, Travellers and Travelling Showpeople. Specifically, the SPD has been designed to provide additional guidance related to a small part of this policy which relates to the allocated gypsy and traveller pitches. The relevant part of the policy seeking to be elaborated on is set out in paragraph 2.2 of the Allocation Scheme SPD. The SPD is not intended to set out a long term management strategy for the allocated traveller pitches and plots, and furthermore, this would not be appropriate as this would not be supplementary to the part of policy SL22 that the SPD seeks to provide further amplification on.</p> <p>Where breaches of planning control are identified, they are investigated by the Council's Planning Enforcement Team as appropriate. Action to remedy such breaches is, and will continue to be taken where this is considered to be proportionate and expedient.</p>	No



Representor	Summary of comments	Response	Changes made to the SPD
		Should it come to the Council's attention that Gypsy & Traveller plots/sites are poorly maintained, the Planning Enforcement department hold powers to initiate formal action under Section 215 of the Town & Country Planning Act, which effectively protects neighbourhoods from land or buildings adversely affecting the amenity of an area. These matters would be looked at on a case by case basis.	
Private Individual	<p>The proposal appears to apply different planning standards for Traveller sites compared to settled residents. There is concern that:</p> <p>Normal planning restrictions (such as green belt protections) are being ignored for these developments, while settled residents face strict planning constraints.</p> <p>Request: The council should conduct a revised public consultation and ensure that planning policies are applied consistently across all development types.</p>	None of the allocated Traveller pitches and plots are located in the Green Belt. All are in the urban area and allocated for this purpose.	No
Private Individual	A lack of communication and understanding between GTTS and the established local population, with cultural differences and	Comments noted.	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>language barriers, leads to misunderstandings and tension.</p> <p>The transient nature of many GTTS makes it difficult for them to forge trusting relationships with locals, which in turn prevents a sense of community from developing.</p>		
Surrey Gypsy Traveller Communities Forum	<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. 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>Recently, however, several Borough and District councils have been actively considering available land that might be suitable for possible development, which the Forum whole-heartedly supports. However, indications from council and resident websites, confirms our view that the public appetite is heavily</p>	Support welcomed.	No

Representor	Summary of comments	Response	Changes made to the SPD
	<p>weighted against such provision attracting often spurious statements, resentment, even hatred. Letters of objection usually contain the idea “We think there should be provision for Gypsies, but not here”, or something similar.</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. We also support new sites being given planning permission on land belonging to Gypsies and Travellers.</p> <p>We further endorse the extension of sites to include new pitches with appropriate consultation with present site occupants to ensure a satisfactory outcome.</p>		
Surrey County Council	Thank you for consulting Surrey County Council on this SPD. We have no comments to make.	Noted.	No

Representor	Summary of comments	Response	Changes made to the SPD
<p>Summary of comments made by more than one representor on this matter</p>	<p>I am one of the residents adjacent to the current pitch site and have previously stated my objection to the original pitch back in 2015 - of which only 1 pitch was approved for 5 years on the Chertsey Bittams C site, but it has since accommodated more. This was clearly in violation of the decision cited in RU.13/0923.</p> <p>Whether the council has been made aware or not, the current site is being used for both domestic and business purposes, as evidenced by the presence of heavy duty trucks in the premises. Needless to point out that the use of the site for business purposes is not part of the conditions of the previous approval. A cursory search in Companies House register shows that there were 2 businesses registered against this address, i.e., MV Auto Repairs Ltd (Company No. 13060737) and Transmatic Ltd (Company No. 12379791). Although both companies have been dissolved, both have been opened within the last 5 years. Therefore, it is noteworthy that the premises were used for business purposes,</p>	<p>The land known as Chertsey Bittams C site was taken out of the Green Belt on the adoption of the Runnymede 2030 Local Plan on 20<sup>th</sup> July 2020. Since this time the planning status of the land has therefore fundamentally changed. The Green Belt restrictions which previously applied to the site at the time that RU.13/0923 was allowed at appeal no longer apply. In planning policy terms, the land now forms part of the urban area where the principle of development is acceptable.</p> <p>There is a resolution to grant planning permission at the Chertsey Bittams C site (subject to the signing of the necessary legal agreement) under planning reference RU.23/0338. This application is for the proposed change of use of land for the creation of 12 Gypsy/ Traveller pitches (11 net including retention of 1 existing pitch) comprising 1 static and 1 touring caravan per pitch including alterations to existing vehicular access point and associated parking, landscaping, amenity areas and bin store.</p> <p>Whilst the application has been progressing through the planning process, the planning enforcement team has continued to monitor the site and have, where necessary, intervened to stop the unchecked development of the land without the necessary planning permission.</p> <p>With regards the land uses occurring on the northern part of the site, it is not currently considered expedient to take formal action given the urban location of the site and the lack of identified planning harms arising. Officers will continue to monitor the activities at the site and will re assess harm if the nature of the activities change.</p>	<p>No</p>

Representor	Summary of comments	Response	Changes made to the SPD
	<p>which violated the conditions set in the original application.</p> <p>We have also noticed that there are extra pitches and mobile vans that have been illegally sited. A number of our neighbours have submitted their complaints to the Council, however, nothing has been done to address this matter. It also resulted in the overflow of vehicles parking (including a flatbed truck) at Bittams Lane road, which provides unwanted hazards to other vehicles using the road. The site already has a constant stream of traffic, even spilling over parking to the grass verge opposite the site. Current behaviour dictates that this will not stop, no permissions will be adhered to, this is quite clear considering existing conditions are already being breached. Moreover, as there are more occupants, pitches, and vehicles situated in the site, this means more waste water and sewage, which may have contributed to the presence of flash floods at the corner of Little Green Lane and Bittams Lane.</p>	<p>It should be noted that the legal parking of vehicles on Bittams Lane is not a planning matter. The illegal parking of vehicles, i.e. where they are parked dangerously or in a way that causes an obstruction, is a police matter.</p> <p>Concerns regarding potential animal neglect should be reported to the RSPCA.</p>	

Representor	Summary of comments	Response	Changes made to the SPD
	<p>There have also been instances when some of our neighbours heard dogs making distressed howls and whines at the site. However, as the dogs cannot be visibly seen from the roadside, there was no proof or evidence of any mistreatment. There have also been a few instances when the horses kept at the site have managed to wander around the area of Little Green Lane. There have been concerns of possible animal neglect, which may warrant a visit from the Council to check and confirm if any cases of animal neglect, mistreatment or harm have been committed.</p> <p>The Chertsey Bittams C site is already being misused and is against their current planning regulations. You have not made any effort to uphold the law on this site and it is fundamentally against everything that is legal and correct.</p>		
General comments made by multiple representors	General objections to the location of pitches in a range of locations including Virginia Water, Chertsey, Ottershaw and Egham	The distribution of pitches for gypsies and travellers was agreed through the examination and subsequent adoption of the Runnymede 2030 Local Plan. The location of pitches is not being revisited as part of the preparation of this SPD.	Summary of comments made by multiple representors on this matter

Representor	Summary of comments	Response	Changes made to the SPD
Private individual	Concern that decisions about the location of pitches are being made by the councillors who, perhaps, are not residents of Addlestone or Chertsey. They would bear a minimum interest in the well-being of the local area.	<p>The location of the allocated pitches has already been established through the Runnymede 2030 Local Plan and is not being revisited as part of this consultation.</p> <p>Local Councillors are democratically elected local representatives who have a variety of roles including, representing their local area and agreeing Council policy, including the Local Plan.</p>	No
Private Individual	Given the itinerant nature of Travellers, Gypsies etc, with whom would any Management Agreement be made and how might it be enforced if signatories are no longer, if only temporarily, in the Borough?	<p>The pitches and plots which are allocated through the local plan are expected to be sold as freehold or leasehold properties to gypsy and traveller households in the same way that developers sell bricks and mortar housing. The households would be responsible for maintaining their properties in the same way as the households who buy houses on the allocated sites. Management agreements will be in place for the wider sites to maintain the communal areas. These agreements are generally handed over to a third party by the developer.</p> <p>It is possible that an affordable housing provider/third party provider could take on some of the traveller pitches and rent them out to members of the travelling community. In this instance, any rental agreements between these parties I am sure would set out the expectations for how the pitch should be kept.</p>	No
Private Individual	The needs of the majority of the population should be prioritised before special groups like the traveller community.	<p>Para 63 of the NPPF sets out that the Council is required ensure that the, <i>'size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families;</i></p>	No

Representor	Summary of comments	Response	Changes made to the SPD
		<p><i>travellers; people who rent their homes and people wishing to commission or build their own homes</i>'. The Council assessed the accommodation needs of all these groups during the preparation of the Runnymede 2030 Local Plan (with the exception of looked after children as this additional requirement was only added to the NPPF in December 2024) and the Local Plan strategy was developed on this basis.</p>	



## **Appendix E-Statement of Representations Procedure for 3<sup>rd</sup> round of consultation**

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 four weeks between Monday 3<sup>rd</sup> February and midnight on Monday 3<sup>rd</sup> March 2025.

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](mailto: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>.