



# Planning Committee

**Wednesday, 9 November 2022 at 6.30 pm**

**Council Chamber, Runnymede Civic Centre,  
Addlestone**

## Members of the Committee

Councillors: M Willingale (Chairman), P Snow (Vice-Chairman), A Balkan, A Berardi, J Broadhead, R Bromley, V Cunningham, E Gill, C Howorth, A King, C Mann, I Mullens, M Nuti, S Whyte and J Wilson

In accordance with Standing Order 29.1, any Member of the Council may attend the meeting of this Committee, but may speak only with the permission of the Chairman of the Committee, if they are not a member of this Committee.

## AGENDA

- 1) Any report on the Agenda involving confidential information (as defined by section 100A(3) of the Local Government Act 1972) must be discussed in private. Any report involving exempt information (as defined by section 100I of the Local Government Act 1972), whether it appears in Part 1 or Part 2 below, may be discussed in private but only if the Committee so resolves.
- 2) The relevant 'background papers' are listed after each report in Part 1. Enquiries about any of the Agenda reports and background papers should be directed in the first instance to **Mr A Finch, Democratic Services Section, Law and Governance Business Centre, Runnymede Civic Centre, Station Road, Addlestone (Tel: Direct Line: 01932 425623). (Email: [andrew.finch@runnymede.gov.uk](mailto:andrew.finch@runnymede.gov.uk)).**
- 3) Agendas and Minutes are available on a subscription basis. For details, please contact [Democratic.Services@runnymede.gov.uk](mailto:Democratic.Services@runnymede.gov.uk) or 01932 425620. Agendas and Minutes for all the Council's Committees may also be viewed on [www.runnymede.gov.uk](http://www.runnymede.gov.uk).
- 4) Public speaking on planning applications only is allowed at the Planning Committee. An objector who wishes to speak must make a written request by noon on the Monday of the week of the Planning Committee meeting. Any persons wishing to speak should email [publicspeaking@runnymede.gov.uk](mailto:publicspeaking@runnymede.gov.uk)

- 5) In the unlikely event of an alarm sounding, members of the public should leave the building immediately, either using the staircase leading from the public gallery or following other instructions as appropriate.
- 6) **Filming, Audio-Recording, Photography, Tweeting and Blogging of Meetings**

Members of the public are permitted to film, audio record, take photographs or make use of social media (tweet/blog) at Council and Committee meetings provided that this does not disturb the business of the meeting. If you wish to film a particular meeting, please liaise with the Council Officer listed on the front of the Agenda prior to the start of the meeting so that the Chairman is aware and those attending the meeting can be made aware of any filming taking place.

Filming should be limited to the formal meeting area and not extend to those in the public seating area.

The Chairman will make the final decision on all matters of dispute in regard to the use of social media audio-recording, photography and filming in the Committee meeting.

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**Part II**

**Matters involving Exempt or Confidential Information in respect of which reports have not been made available for public inspection**

**Runnymede Borough Council****Planning Committee****Wednesday, 5 October 2022 at 6.30 pm**

Members of the Committee present: Councillors M Willingale (Chairman), P Snow (Vice-Chairman), A Balkan, A Berardi, J Broadhead, V Cunningham, E Gill, C Howorth, J Hulley (Substitute, in place of R Bromley), A King (Substitute, in place of R Davies), C Mann, I Mullens, M Nuti, S Saise-Marshall (Substitute, in place of J Wilson) and S Whyte.

Members of the Committee absent: None.

In attendance: Councillors T Burton, L Gillham and D Whyte.

**246 Minutes**

The Minutes of the meeting held on 7 September 2022 were confirmed and signed as a correct record.

**247 Apologies for Absence**

No apologies received.

**248 Declarations of Interest**

Councillor J Hulley declared a non-registerable in application RU.22/0512, having an association with the objector to the development. Councillor Hulley sought advice from officers and remained in the room and voted on this item.

Councillor M Nuti declared a non-registerable interest in application RU.22/0374, having a relative who works at the location. Councillor Nuti left the room for this item.

**249 Planning Applications**

The planning applications listed below were considered by the Committee. All representations received on the applications were reported and copies had been made available for inspection by Members before the meeting. The Addendum had also been published on the Council's website on the day of the meeting. Objectors and applicants and /or their agents addressed the Committee on the applications specified.

**RESOLVED that –****the following applications be determined as indicated: -****250 RU.22/0512 - Longcross North, Chobham Lane, KT16 0EE**

*A Reserved Matters Application which followed outline consent for proposed sports provision, public open space and access road to Longcross Railway Station, including pedestrian and cycle routes and station car park.*

The Council's Development Manager advised the Committee that when the outline application was approved all matters were reserved. The five matters under consideration and for the Committee to base their decision on related to the access, appearance, layout, scale and landscaping.

Members welcomed the prospect of a garden village within the borough, however a level of concern was raised relating to the location of the station car park,. There was also concern from some members that the drop-off point was located in the car park rather than outside the station, whilst a Member also considered it insufficient only having three disabled spaces.

There was also concern about the number of trees to be felled to accommodate cycle storage and a turning circle for double decker buses, whilst several Members questions whether the trees that were intended to provide screening between the film studios and station were of the required stature to adequately carry out the task.

Several Members also raised the safety aspect, quoting paragraph 92 of the National Planning Policy Framework which states that planning policies and decision should aim to achieve healthy, inclusive and safe places so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Whilst acknowledging the area would be lit, it was felt that the relative remoteness of the path between the station and car park would make many people fear the threat of crime.

Members were advised that the original masterplan for the northern site dates back to the original application in 2013, which was prior to the garden village designation and local plan adoption and at that time it was envisioned the western site area would be an office complex. This has meant that the original masterplan has evolved over time and the site occupied as a film studio.

Officers confirmed that South West Trains were consulted as part of the application, and their comments had been fed back through the Highways Authority relating to the turning circle at the location.

As Planning Authority the Council was required to determine the scheme in front of it on its own merits. The recommendation in the report indicated that the current car park site was considered acceptable by officers. Officers recognised that some residents would prefer the station to be located in alternative positions or access from different locations, however the suggestions put forward would require the felling of a substantial area of trees that were covered by a TPO, had a high amenity value, had ecological importance as a bat corridor, was within 400m of the Thames Basin Heath SPA and would lose important the boundary screening to dated MoD buildings and as such the alternative site advanced by some residents was not considered likely to be supportable in planning terms. It was considered by officers that having the car park at the proposed location would also strike a balance between convenience and promoting sustainable modes of transport.

A Member asked about the adoption of the access road, and was advised that Surrey County Council would only consider adopting the road once it adjoined a public highway.

A Member questioned the ecological value of the trees and whether they would provide the desired screening levels to the warehouse. It was also noted that the trees were not native to the southeast of England, and more native trees in a different configuration might provide a more effective screening. Members were keen for officers to seek a second opinion on the suitability of the trees. Officers commented that a TPO is not purely about the ecological value of trees but also their amenity.

Part of the application included the provision of two informal football pitches and tennis and table tennis courts. These were provided for the existing shortfall of sports provision for the benefit of the existing residents of Longcross North and it was not anticipated that residents would drive to access them.

Whilst acknowledging the Council's Climate Change strategy, a Member was concerned

that the 42 parking spaces provided would not be sufficient and could result in fly-parking. It was added that an application from 2020 contained a comment from the train operator feeling that the number of spaces was insufficient.

However, the Development Manager advised that there was no evidence that 42 spaces would not be sufficient, whilst the number of disabled spaces fell within the standard 5% of total spaces. Concerns about overspill parking could be mitigated against through parking control measures. Furthermore, in the event of an appeal it would be challenging to explain why the Council were going against the principles of a Garden Village.

Surrey County Council Highways had agreed the 3m wide cycle path that runs along the access road, but officers agreed to follow up on whether it was uni-directional or bi-directional.

The Committee Chair proposed deferring the application to enable Planning Officers to address a number of issues, primarily around access and security associated with the path, the rationale behind the car park location and drop off points, predicted travel patterns, and a second opinion on the ecological value of the trees.

A Member also suggested comparative studies with other train stations that have car parks a similar distance away and evaluate whether they were successful in achieving their behavioural measures.

An earlier request by a Member for a named vote was withdrawn based on the decision to vote on deferral of the application.

**Resolved that –**

**Deferred to enable Planning Officers to provide more certainty and clarification on a number of technical matters.**

Ms Loach, an objector, and Mr Knott, agent for the applicant, addressed the Committee on this application.

251 **RU.22/0374 - Thorpe Park, Staines Road, Chertsey, KT16 8PN**

*Redevelopment of the "Old Town" area within theme park, to install a rollercoaster along with associated buildings and structures, ground works infrastructure and infilling of part of lake and landscaping following the demolition of existing buildings and structures.*

The Assistant Development Manager clarified that the Environment Agency were a statutory consultee to the flood-risk element of the application rather than the determining authority, however they had raised an in-principle objection around the construction of a new roller-coaster in a functional flood-plain.

Officers felt this risk had been mitigated by the theme park's flood compensation storage scheme where existing compensation areas in operation over a prolonged period had demonstrated that there was no increased flood risk, as the Environment Agency themselves acknowledged during the theme park's previous planning application in 2018.

This flood compensation scheme also mitigated the proposed in-filling of the lake.

Officers would continue to engage with the Environment Agency, however resourcing issues meant that their response times to planning applications was currently around 8-12 weeks, and the importance of the theme park moving forward with the application was noted.

A Thorpe ward councillor welcomed the introduction of a new ride within what they considered a slightly derelict part of the park, and cemented the status of the theme park within the borough.

However, surrounding infrastructure remained an issue, and whilst thanking the area's county councillor for the work done with residents to understand and overcome local issues, suggested that new ideas to improve access into the park and ease local congestion would be welcomed.

The Assistant Development Manager confirmed to Members that whether the historic A320 study took into account visitor numbers to the theme park was not relevant to the specific planning application, and whilst an increase in numbers was expected above the existing levels, that increase would not take the theme park over previous levels which took place at the park.

The Assistant Development Manager confirmed to a Member that Monks Walk was outside of the development site, and access to that area would be unaffected.

**Resolved that –**

**The CHDMBC be authorised to grant planning permission subject to referral to the Secretary of State (and/or receiving no adverse comments from the re-consultation with the Environment Agency on additional supporting information), and subject to the planning conditions set out in the agenda.**

(The meeting ended at 8.52 pm.)

Chairman

## **6. Planning Applications**

The planning applications to be determined by the Committee are attached. Officers' recommendations are included in the application reports. Please be aware that the plans provided within this agenda are for locational purposes only and may not show recent extensions and alterations that have not yet been recorded by the Ordnance Survey.

**If Members have particular queries on the applications, please contact Ashley Smith, Corporate Head of Development Management and Building Control by two working days before the meeting**

Copies of all letters of representation are available for Members and the public to view on the Planning pages of the Council website

<http://planning.runnymede.gov.uk/Northgate/PlanningExplorer/GeneralSearch.aspx>.

Enter the planning application number you are interested in, and click on documents, and you will see all the representations received as well as the application documents.

**(To resolve)**

### **Background Papers**

A list of background papers is available from the Planning Business Centre.





Date: 09/11/2022

**Windsor Illuminated**



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Scale: 1:10,000

**RU.22/1421**

0 150 300 m



**COMMITTEE AGENDA REFERENCE: (5a)**

<b>APPLICATION REF:</b>	<b>RU.22/1421</b>
<b>LOCATION</b>	The Savill Building, Wick Lane, Englefield Green, Surrey, TW20 0UU
<b>PROPOSAL</b>	Proposed temporary Light Trail Event, starting and ending from The Savill Garden Visitor Centre Car Park and circumnavigating the Obelisk Pond along established footpaths/tracks. Taking place from mid-November (installation commencing in late October) to early January (breakdown completing in late January) in 2022, 2023, 2024 and 2025.
<b>TYPE</b>	Full Planning Permission
<b>EXPIRY DATE</b>	03/11/2022
<b>WARD</b>	Englefield Green West Virginia Water
<b>CASE OFFICER</b>	Justin Williams
<b>REASON FOR COMMITTEE DETERMINATION</b>	Major application
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

**1. SUMMARY OF RECOMMENDATION**

<b>It is recommended the Planning Committee authorises the CHDMBC:</b>	
1.	<b>Grant subject to conditions</b>

**2. DETAILS OF THE SITE AND ITS SURROUNDINGS**

- 2.1 The majority of the application site sits within Windsor Great Park, but the proposal would also include part of Savill Gardens including the main visitor building and the car park. Windsor Great Part is a Grade 1 listed park and covers an area of 1500 ha and is open to the public from dawn till dusk.
- 2.2 Vehicular access to the site would be via Wick Lane and would use the existing car park located in front of the visitor building. The site is within the Green Belt, includes

an area of ancient woodland and is within a Site of Nature Conservation Importance. The Obelisk is also a Grade II Listed Building.

- 2.3 The site is generally level around the Obelisk Pond with a slight gradient up to the main visitor Centre at Savill Gardens. The site has several paths which are open to the general public and not within Savill Garden being within Windsor Great Park.

### 3. APPLICATION DETAILS

- 3.1 The applicant has applied for Full Planning Permission for the installation of an illuminated visitor attraction of 2.2 kms. The event will open for a preview event on the 16<sup>th</sup> November with the full opening on the 17<sup>th</sup> November. The event will run every evening apart from Christmas day from 16:30 to last entry at 20:30 until 3<sup>rd</sup> January 2023. The site will be clear of the installation by 12 January 2022. The event will be closed each night and clear of staff and visitors by 22:30.
- 3.2 The event will be for pre booked tickets only and it is anticipated that the event will attract approximately 130,000 visitors over the duration of the event. Whereas the event would have a capacity of 518 per 30 minutes. The event will also include portable toilet facilities, food and beverage traders, and a carousel ride.
- 3.3 The applicant has submitted a number of supporting documents with the application, notably, a Heritage Assessment, Planning Statement, Design and Access Statement, Transport Statement and Traffic Management Plan, Ecological Impact Assessment, Light Trail Assessment and Arboricultural Method Statement.
- 3.4 The applicant has submitted an additional statement in response to the letters of representations received. The layout and design of this year's event has been designed following concerns raised to the applicant following the completion of last years event. A noise assessment and lighting assessment will be carried out to ensure that any sensitive receptors are not adversely affected. Adjustments will be made to the event if required. Additional signage will be added to direct visitors at the site and to encourage visitors to act responsibly with regard to disposal of waste. Ecology surveys and transport monitoring will be carried out and reports submitted each year to assess whether any changes to the event are required.

### 4. RELEVANT PLANNING HISTORY

- 4.1 The following history is considered relevant to this application:

Reference	Details
RU.21/1446	Proposed temporary Light Trail Event, starting and ending from The Savill Garden Visitor Centre Car Park and circumnavigating the Obelisk Pond along established footpaths/tracks. Taking place between 18th November 2021 and 9th January 2022 (installation commencing 26th October 2021 and breakdown completing on 23rd January 2022. Granted October 2021

RU.20/0720	Proposed extension to the Savill Building, New toddlers Play Garden and New Woodland Walkway. Granted October 2020
RU.17/0821	Alterations to the existing entrance retaining wall to provide new glazed access doors to a new proposed 'grab and go' food drink facility and the proposed installation of raised external floor lights along the main pedestrian entrance. Granted July 2017
RU.03/0911	Proposed new visitors centre and improvements to car park. Existing buildings to be demolished after completion. No objection January 2004.

## 5 SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

- 5.1 National Planning Policy Framework and Guidance.
- 5.2 The Runnymede 2030 Local Plan was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.
- 5.3 This site falls within the designated Englefield Green Neighbourhood Area. However a Neighbourhood Plan has not been developed yet for this area.

## 6. CONSULTATIONS CARRIED OUT

### Consultees responses

Consultee	Comments
Historic England	Comments Awaited
The Gardens Trust	Wishes to make no comment.
RBC Conservation Advisor	No objection
RBC Environmental Protection Officer	No objection
RBC Tree Officer	No objection
Surrey County Highways	No objection
Surrey Bat Group	Raised points which are covered in the officer report.
Surrey Wildlife Trust	No objection

## **Representations and comments from interested parties**

6.2 247 Neighbouring properties were consulted in addition to being advertised on the Council's website, in the local press and three site notices have been displayed in the surrounding area and twenty four letters of representation have been received which can be summarised as follows:

- The proposal causes disturbance to wildlife in the park and light pollution
- The proposal also causes traffic on Wick Road, Bishopsgate and Wick Lane
- The proposal had limited signage around The Fairmont Hotel and Wick Lane.
- The number of visitors to the event is likely to be close to the capacity because of the longer period of publicity and marketing and overall interest from the public to royal venues.
- The additional traffic caused damage to the routes around Wick Lane and Wick Road
- The event last year generated significant and regular littering around the area
- The event impacted upon the health and safety of residents using the road because of the increase in number of vehicles.

A letter has also been received from Englefield Green Residents Association which raise the following concerns:

- The proposal caused severe traffic flow problems during the event in 2021 with a large volume of traffic through the centre of the village.
- Traffic management and signage should be clear and with marshals' along the route
- The application should be for one year only for it to be reappraised for the subsequent years.

## **7. PLANNING CONSIDERATIONS**

7.1 In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The application site is located within the Green Belt where there is a presumption against inappropriate development. This must be considered in light of the presumption in favour of sustainable development advocated by the NPPF. The key planning matters are whether the proposed works are considered to be an appropriate form of development within the Green Belt, and if not whether there are any very special circumstances to outweigh the harm to the Green Belt and any other identified harms. The impact the proposed works would have on the amenities of the area, Trees, Biodiversity, the Listed Garden and the Grade II Listed Obelisk.

7.2 The site is an existing parkland in the Green Belt which has a number of mature trees and has a network of paths around the site. The proposal would include temporary buildings at the site to facilitate the event which would be on site for a period of up to approximately 13 weeks and facilitate the use of the park into the evening when it is normally closed. The NPPF states that the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor recreation as long as the facilities preserves the openness of the Green Belt and do not conflict with the purposes of the Green Belt is an appropriate form of development in the Green Belt.

- 7.3 The proposal would include the provision of temporary catering and toilet facilities as well as illuminated structures using existing paths which are predominantly surfaced. Following the completion of the event the park would be returned to its former condition with all structures removed from the site. The structures are low level and are temporary in nature and access to the site and parking would use existing roads and car parking. It is therefore considered that the structures would be appropriate facilities to enjoy the park in the winter months for a temporary period and that they would not permanently harm the openness of the Green Belt and would not conflict with the purposes of the Green Belt. The proposal would not be inappropriate development in the Green Belt and would comply with Policy EE16 of the Local Plan.
- 7.4 The structures would be located within the park and would not be clearly visible from outside of the park. Furthermore, the proposal would be open for 46 days with limited opening hours from 16:30 to 22:30 with the last admission being at 20:30. The event will be closed and clear by 22:30. Therefore, it is considered that the proposal would not materially result in any permanent harmful impact on the amenities of the occupiers of the adjacent neighbouring properties from light pollution or noise disturbance into unsociable hours. The proposal would therefore comply with Policies EE1 and EE2 of the Local Plan.
- 7.5 The site would generate activity at the site into the evening when it is normally closed. The event would have low level seasonal music audible throughout the trail. However, this will cease 20 minutes before the end of the event. The closest residential property to the trail is within the Great Park and approximately 24 metres away. This has dense mature evergreen planting on the boundary with the park. The applicant has also advised that an acoustic barrier will be installed to prevent any detrimental impact on this neighbouring property from noise emanating from the event. The applicant has submitted a Noise report detailing the noise levels from last year's event. The Council's EHO has advised that any potential noise generated would be limited and not extend late into the evening to be a nuisance. It is accepted that the event would be a change from the current situation, however, any disruption would be for a temporary period and given the boundary screening, limited opening hours and acoustic treatment and distance to neighbouring properties the proposal would not materially result in significant noise and disturbance to the occupiers of the neighbouring properties.
- 7.6 Power to the site would be provided by four generators. The submitted plan shows the location of these generators to be a good distance away from the closest residential properties, approximately over 100 metres at the closest point. Furthermore, the applicant confirms that the event would be finished by 10.30pm, and therefore it is considered that the proposal would not materially harm the amenities of the occupiers of the adjacent neighbouring properties from noise or light disturbance.
- 7.7 However, a condition is recommended restricting the operation of the event and the lighting, music, and generators to be operational between 16:00 and 22:30 to ensure the amenities of the occupiers of adjacent neighbouring properties are protected. This is longer than the intended opening hours but would enable the site to open with music and lighting on for a short period before and after the event.
- 7.8 The attraction will be located within the Great Park which has a number of mature trees and other natural landscaping and home to a wide range of flora and fauna. The applicant has submitted an Arboricultural Impact Statement and Method Statement in support of the application which details how the proposal would impact on trees in the park. The report notes that the trees on the site do not require any tree work to facilitate the development as the trees on the site are regularly inspected as part of the estate management programme.

- 7.9 However, where the attraction goes close to some trees, protective matting will be put down and the areas around these trees will be inspected weekly with additional protection put down when required. Furthermore, it is recommended that following the closure of the attraction the trees will again be reviewed to assess their condition to monitor any potential reaction to the attraction. The Council's Tree Officer raises no objection subject to condition regarding compliance with the submitted Arboricultural Method Statement and that an updated Arboricultural Method Statement be submitted prior to commencement of the installation works each year.
- 7.10 The applicant has submitted an Ecological Impact Assessment in support of the application. This notes that the site does not extend into any protected areas such as the Site of Special Scientific Interest, (SSSI) or the Special Area of Conservation (SAC), with these being approximately 500 metres and 600 away from the application site. The SAC has been designated for its valuable woodland habitats and presence of the Violet click beetle *Limoniscus violaceus*. Officers consider that the proposal given its distance away would result in no likely significant effects on these ecological receptors and as such no appropriate assessment is required
- 7.11 The report also refers to field surveys carried out to establish the presence of species on the site around where the installation would be going. The trail will follow existing pathways throughout the estate with the lighting for effect only and not directly into the trees. This concluded that there were three trees which had moderate to high potential for roosting bats. The statement advises that the timing of the trail will be at a period when bats will be in hibernation and there would be limited or no potential for foraging or bat behaviour. Furthermore, the proposal would be for temporary time period only.
- 7.12 Surrey Bat Group, raise a concern that the surveys were carried out at a time when any potential roost features were obscured by vegetation and has not considered trees that would be affected by light spill and that no surveys have been carried out when the lighting will be in use. The Surrey Wildlife Trust also raised concern about the lighting around the trees and how ecological surveys will be carried out at the site in future. The applicant has responded to these concerns and has confirmed that they have looked at the trees along the route several times since the initial survey and have seen all potential roost features. In addition, the applicant's ecologist has advised that bat surveys during the time period of the event would not change their conclusions given that bats will be in hibernation and that the light installations are for effect and would not create light spill with them being based around permanent pathways in the estate. The Wildlife Trust has confirmed that an updated ground level roost assessment is submitted each year for the duration of the project to ensure that the status of the trees have not changed. Therefore, subject to this condition, it is considered that the proposal would comply with Policy EE9 of the Runnymede Local Plan.
- 7.13 Windsor Great Park is a Grade I Listed Park and covers an area of 2500 Hectares. The applicant has submitted a Heritage Assessment with their application. Policy EE6 of the Local Plan which refers to Parks and Gardens of Special Historic Interest details that proposals within or may affect the setting of a registered park or garden will be required to protect, conserve, and enhance the character and appearance of the park and any other historical features. The lighting and structures will change the character and appearance of the park by introducing different features which are not found in the park. However, the installations are temporary and would encourage people into the park and view the park in a different way. The submitted information details that the lighting and structures would preserve the character and appearance of the park and the temporary nature of the attraction would mean that the proposal would not result in any harm to the Historic Park or the Listed Obelisk. The Council's

Historic Building Advisor raises no objection to the application particularly because of its temporary nature.

- 7.14 Entry to the attraction would be via an access from the Car Park at Savill Garden. No alterations are proposed to this car park. The Planning statement states that attraction would have staggered opening times with a maximum of 2072 visitors on site in a peak session. The submitted transport assessment states that the light trail is anticipating a maximum of 1381 cars per day to the site. This will be spread out throughout the event because of the staggered time slots and requirement for tickets to be booked in advance.
- 7.15 This is in comparison to the peak number of users at the site in April this year being 1876 cars on site during the day. The site has 669 vehicular spaces, with an additional 21 allocated for disabled parking. Access to the attraction would be signposted to use St Judes Road off the A30 coming from a South and westerly direction and Windsor Road and Priest Hill coming from a northerly and easterly direction and then directing traffic down to Bishopsgate Road. Traffic for the setting up and removal of the attraction would be the reverse. The existing car park has areas for disabled parking and bike storage and a taxi rank which would also be available for the attraction.
- 7.16 Tickets for the attraction will be pre booked with visitors arriving by car also advised to pre book a car parking space. The applicant has advised that residents near to the site will be given a newsletter about the attraction with details about how to access the site by foot. Visitors to Windsor Great Park who are not visiting the attraction will be able to return to their vehicles at Virginia Water Car Park and there will be a lit back route to assist visitors in the early evening. The applicant has confirmed that there will be no access to the event from the Virginia Water Lake Car Park only through the entrance at Savill Gardens.
- 7.17 Neighbours have raised concern about the increase in traffic along Wick Lane causing traffic, being a danger to residents and noise disturbance. The submitted Transport Statement and Traffic Management Plan state that routes to the event will be signposted to discourage traffic along Wick Lane (A30 junction). Production traffic will be via the Blacknest gate junction into Windsor Great Park. The submitted document also outlines measures how parking will be controlled at the site.
- 7.18 Policy SD4 of the Local Plan refers to the Council supporting development proposals which maintain or enhance the efficient and safe operation of the highway network and take into account of the needs of all highway users. The County Highways Authority raise no objection to the application and consider that the proposal would not represent a notable highway safety concern and would comply with Policy SD4 of the Runnymede 2030 Local Plan. However, a condition is recommended that the development shall be commenced in accordance with the submitted Transport Statement and Traffic Management Plan.
- 7.19 The NPPF requires that significant weight should be placed on the need to support economic growth. The submitted Design and Access Statement details that the proposal would provide approximately 300 jobs. Policy IE4 of the Runnymede 2030 Local Plan details that planning applications which deliver a high-quality visitor experience that increases the contribution that tourism makes to quality of life will be supported where they accord with certain criteria. The criteria includes preserving the Borough's special heritage and natural environment and accord with other relevant policies in the local plan. The proposal would attract visitors to the area and for the reasons identified above would accord with other policies in the Local Plan. The proposal would also assist in promoting the Borough as a tourist destination whilst preserving the culture and heritage of Windsor Great Park. The proposal would comply with Policy IE4 of the Local Plan.



7.20 The application is similar to the previous approved attraction last year RU.21/1446, being based around the lake and accessed through Savill Garden car park. The submitted information states that there will be approximately a maximum of 4,144 visitors on site per night if all slots were full. However, because of the staggered ticketing times the maximum number of people on site would be 2072. With the maximum No. of cars visiting the site in the evening at 1381, which would be less than the peak day time visitors to the site which was 1876 vehicles throughout the day. This is up from the previous year which would have had a maximum of 1395 visitors at peak time and a maximum of vehicles on site per day at 1550. The applicant has advised that the parking spaces at the site has increased from last year, because parts of the car park was occupied for the construction works for the Children's play area, which has since been completed.

7.21 The applicant has advised that the car parking will be managed by an increased number of staff in the car parking team and will be offset by the event closing on the 3<sup>rd</sup> of January instead of the 9<sup>th</sup> January in 2021. The proposal is to ensure consent for the event for the next four years, with the predominant differences the being trail format, design of lighting operation and installation dates. Conditions, are therefore recommended for the applicant to submit updated information of the event and installation dates along with an updated Arboricultural Method Statement, Noise report and Ecology statement by beginning of September every year from 2024 to 2026 to ensure the amenities of the park and area are protected.

## **8. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)**

8.1 The proposal is not CIL liable

## **9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS**

9.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.

Consideration has been given to s149 of the Equality Act 2010 (as amended), which has imposes a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

## **10. CONCLUSIONS**

- 10.1 The proposal would be an appropriate form of development within the Green Belt utilise existing infrastructure and open the park for visitors in a time of year when visitor numbers to the park may be lower, therefore continuing to contribute to the economy of the area.
- 10.2 The development has been assessed against the following Development Plan policies – EE1, EE2, EE3, EE4, EE6, EE16, SD4 and IE4 of the Runnymede 2030 Local Plan, the policies of the NPPF, guidance in the PPG, and other material considerations including third party representations. It has been concluded that the development would not result in any harm that would justify refusal in the public interest. The decision has been taken in compliance with the requirement of the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

## 11. FORMAL OFFICER RECOMMENDATION

***And the subject to the following planning conditions:***

1 Full application (standard time limit)

The development for which permission is hereby granted must be commenced not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2 List of approved plans

The development hereby permitted shall not be carried out except in complete accordance with the following approved plans; Mobile Cabins Info, Mobile Toilet info, Event Management Plan, Ecological Impact Assessment, Arboricultural Method Statement, Event Location Plan 2022, Proposed Event Layout 2022, Tipi Elevation all received 8 September 2022 and Transport Statement and Traffic Management Plan Version 2 received 27 September 2022

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF

3 Opening and operational times.

The event hereby approved shall not be open to customers and music and lighting shall not be operational outside the following hours:

16:00 - 22:30 except Christmas Day when the event will be closed all day

Reason: To protect the residential amenities of the neighbouring properties and to comply with Polices EE1 and EE2 of the Runnymede 2030 Local Plan and guidance within the NPPF.

4 Arboricultural Method Statement

Prior to the commencement of the installation of the proposed trail for 2023, 2024 and 2025 and before any equipment, facilities or materials are brought on to the site for each relevant year a detailed and updated Arboricultural Method Statement (AMS) shall be submitted to and approved in writing by the local planning authority. The statement shall be in accordance with BS5837:2012 - Trees in relation to design, demolition, and construction, and shall contain details of, but not be limited to, the specification and location of tree and ground protection to be used. The statement should also contain details of arboricultural supervision and frequency of inspection during the event. All works shall be carried out in strict accordance with the approved details.

Reason: To ensure that the trees are not damaged or otherwise adversely affected by operations and to comply with Policies EE1 and EE11 of the Runnymede 2030 Local Plan and policy within the NPPF

5 Compliance with Arboricultural Method Statement.

The development hereby approved shall not be implemented other than in accordance with the tree protection principles and methodology as described within the Arboricultural Method Statement dated 31 August 2022.

Reason: To ensure that the trees are not damaged or otherwise adversely affected by operations and to comply with Policies EE1 and EE11 of the Runnymede 2030 Local Plan and policy within the NPPF.

6 Transport Statement & Traffic Management Plan

The development hereby approved shall be commenced in accordance with the approved Transport Statement & Traffic Management Plan (TS&TMP), dated August 2022 Version 2. The approved TS&TMP shall then be implemented at all times during the event, including during the set-up and dismantling of the event. Any changes to the TS&TMP shall be agreed in writing by the Local Planning Authority.

Reason: In order that the development does not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policies SD3, SD4 SD5 and SD7 of the Runnymede 2030 Local Plan and policy within the NPPF

7 Future layout and opening days of event

Prior to the commencement of the installation of the proposed trail for 2023, 2024 and 2025 and before any equipment, facilities or materials are brought on to the site, details of the proposed layout of the event and opening and closing days of the event and details of the construction and breakdown of the event shall be submitted to and approved by the Local Planning Authority.

Reason: To preserve the openness of the Green Belt and the character and appearance of listed structures within the Great Park and to ensure protection of the

amenities of the area and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

8) Ecological Appraisal

Prior to the commencement of the installation of the proposed trails for 2023, 2024 and 2025 and before any equipment, facilities or materials are brought onto the site, an updated Ecological Appraisal, which shall include an updated ground level roost assessment of the trees along the proposed route, shall be submitted to and approved in writing by the Local Authority. Any measures identified in the updated and approved Ecological Appraisal shall be implemented for the duration of the event including the set up and dismantling of the event.

Reason: To ensure that the proposal would not affect the biodiversity of the area and the amenities of the adjacent neighbouring properties are protected and to comply with Policies EE2 and EE9 of the Runnymede 2030 Local Plan and guidance in within the NPPF.

9) Details of Noise and lighting Assessment

Prior to the commencement of the installation of the proposed trails for 2023, 2024 and 2025 and before any equipment, facilities or materials are brought onto the site a lighting and noise assessment shall be submitted to and approved in writing by the Local Planning Authority. Any measures identified in the updated approved Noise and Lighting Assessments shall be implemented for the duration of the event including the set up and dismantling of the event.

Reason: To ensure that the proposal would not affect the biodiversity of the area and the amenities of the adjacent neighbouring properties are protected and to comply with Policies EE2 and EE9 of the Runnymede 2030 Local Plan and guidance in within the NPPF.

10) Details of Noise Barrier

Prior to the commencement of the installation of the proposed trails for 2023, 2024 and 2025 and before any equipment, facilities or materials are brought onto the site details of the location and extent of any noise barrier or mitigation methods as outlined in a submitted Noise Assessment shall be submitted to and approved in writing by the Local Planning Authority and these measures shall be installed for the duration of event.

Reason: To ensure that the proposal would not affect the amenities of the adjacent neighbouring properties and to comply with Policies EE2 and EE9 of the Runnymede 2030 Local Plan and guidance in the NPPF.

**Informatives:**

1 Summary of Reasons to Grant Consent

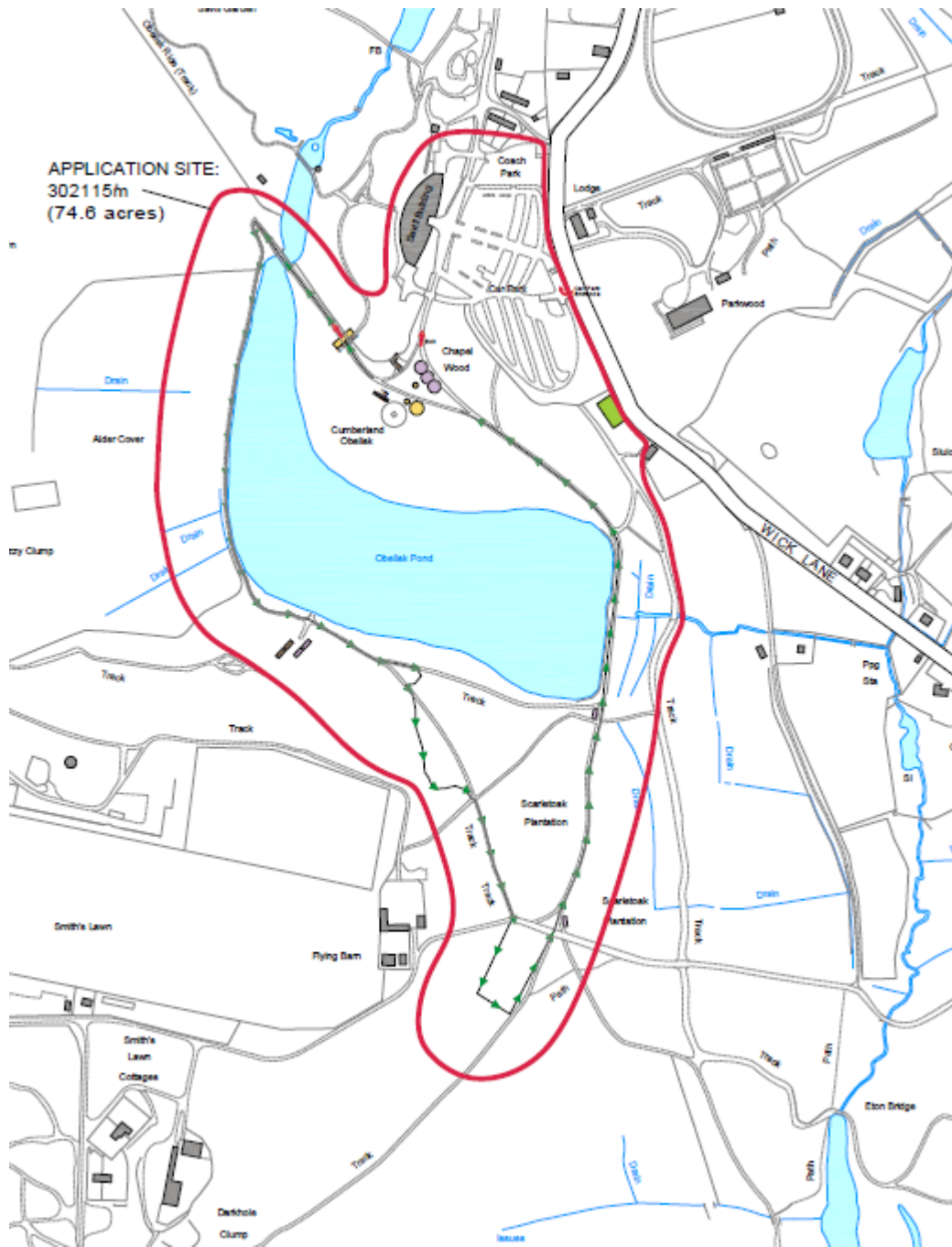
The decision has been taken in compliance with the requirement in the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

## 2 Traffic Management Proposals

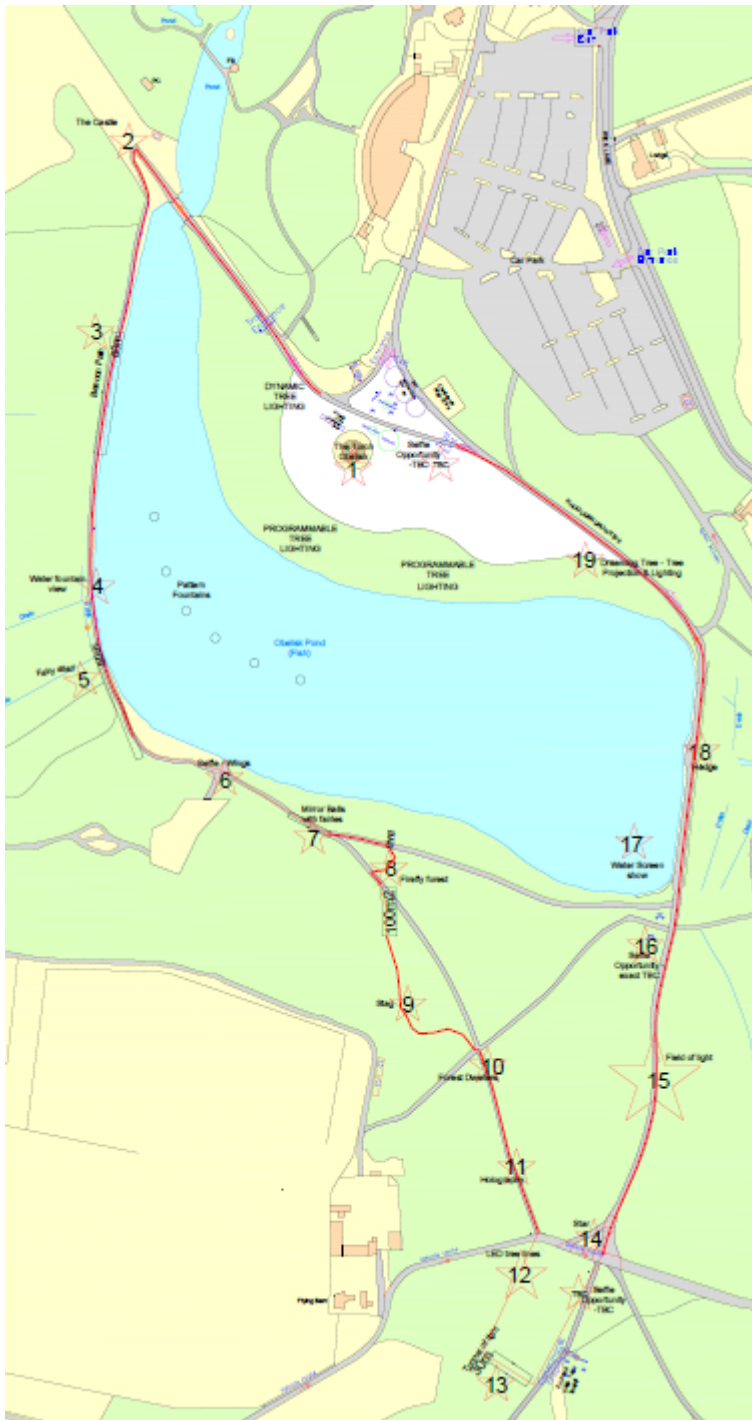
The applicant is advised that any traffic management proposals located on the public Highway, including the signage mentioned within the TS&TMP, required for the event will require the prior approval of the Highway Authority. The applicant should contact the Transport Development Planning Team at Surrey County Council for further advice and assistance on [tdprunnymede@surreycc.gov.uk](mailto:tdprunnymede@surreycc.gov.uk)

RU.22/1421 – Savill Building Wick Lane Englefield Green

Location Plan



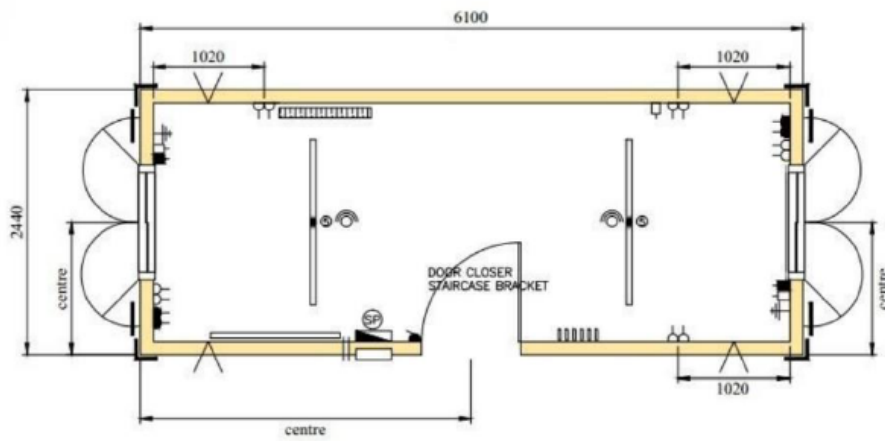
Proposed trail layout plan



Proposed mobile offices



### 20 x 8ft Office



### Mobile Toilets



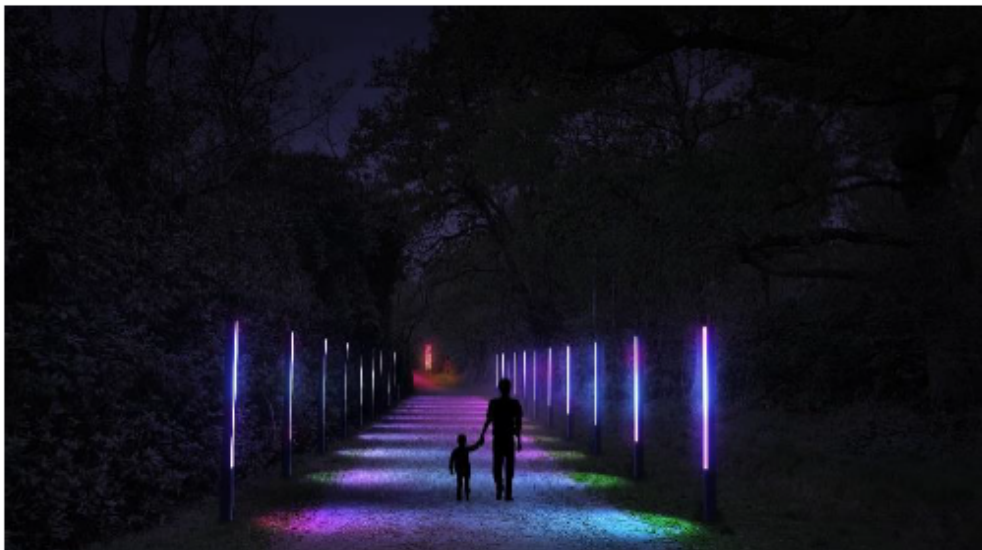


Proposed lighting features

## 2. Windsor Castle installation



## 3. Beacon Path



8. Firefly forest with 3 x archway tunnels



16. Selfie Opportunity

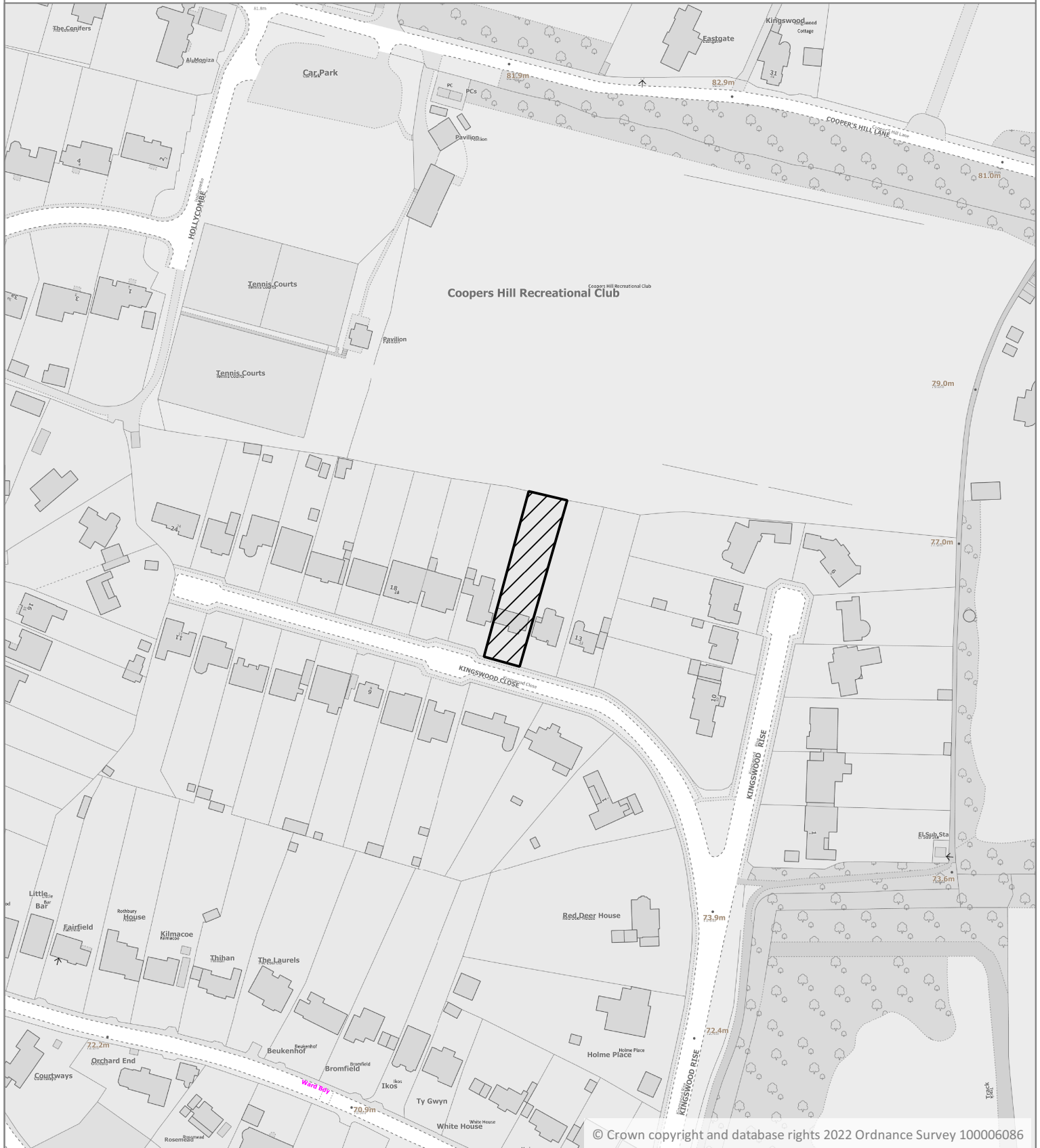






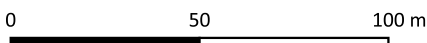
Date: 09/11/2022

**15 Kingswood Close, Egham**



Scale: 1:2,000

**RU.22/0611**



**COMMITTEE AGENDA REFERENCE: 5b**

<b>APPLICATION REF:</b>	RU.22/0611
<b>LOCATION</b>	15 Kingswood Close Englefield Green TW20 0NQ
<b>PROPOSAL</b>	Part two storey part single storey rear extension and rear dormer. Two storey side extension. Replacement of front double storey section, new front bay windows, open porch and fenestration changes
<b>TYPE</b>	Full Planning Permission
<b>EXPIRY DATE</b>	Extension of time agreed until 11 <sup>th</sup> November 2022
<b>WARD</b>	Englefield Green West
<b>CASE OFFICER</b>	Katherine Appleby
<b>REASON FOR COMMITTEE DETERMINATION</b>	Number of letters of representation received
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

**1. SUMMARY OF RECOMMENDATION**

<b>It is recommended the Planning Committee authorises the CHDMBC:</b>	
1.	Grant consent subject to conditions

**2. DETAILS OF THE SITE AND ITS SURROUNDINGS**

- 2.1 The application site lies on the north side of Kingswood Close and comprises a 2-storey detached dwelling set back on a large rectangular plot. The street is characterised by large, detached dwellings of varying styles along with a small number of bungalows. An Oak Tree within the rear garden is protected under TPO 452. The site is adjoined on either side by dwellings and backs onto Coopers Hill Recreational Club. The site is in the urban area.

**3. APPLICATION DETAILS**

- 3.1 The application proposes a general enlargement and internal reorganisation of the existing dwelling involving a part two storey, part single storey rear extension, rear dormer, 2 storey front extension, two storey side extension as well as additional front bay windows and porch. The side extension will match the ridge and eaves height of the existing dwelling with the front and rear extensions tying into the existing main roof at lower levels with a central front gable and rear treble hipped pitched roofs.
- 3.2 The main body of the dwelling will have a total ground floor depth of 11 metres with the central front extension and porch extending a further 3m with 1m deep bay windows either side. The attached garage which was located close to the side boundary with no.16 but has already been demolished, would be replaced with a reception room on the ground floor and a larger bedroom on the first floor and the side extension would be set away at least 1.43 metres from the side boundary with no.16 (a bungalow).
- 3.3 The single storey rear extension with a pitched and hipped glazed roof with rear windows and central bifold doors and would be set away 1.44-1.49 metres from both side boundaries. The rear extension above at first floor would have a treble pitched hipped roof with a depth of 3.5 metres and would be set away 2.94-2.99 metres from the side boundary with no.16 and 2.7 metres from the side boundary with no.14 (with no ground or first-floor side windows). A flat roof rear dormer which would be set down from the ridge, away from the sides, set back and tying into the main existing rear roof slope is also proposed. The dwelling will be rendered with grey roof tiling and grey metal fenestration detailing.

- 3.4 This application follows the refusals of RU.20/1423, RU.21/0463 and RU.21/1100. Following discussions with Officers the current proposals have been revised to overcome the Planning Inspector's concerns which were raised during the appeal for most recent application RU.21/1100. The revisions when compared with RU.21/1100 are set out below.

	<b>Previous RU.21/1100</b>	<b>Current RU.22/0611</b>
Depth of ground floor rear extension	6 metres	5.5 metres
Depth of first floor rear extension	4.2 metres	3.5 metres
Separation distance from first floor rear extension to side boundaries	1-1.2 metres	2.7 -2.99 metres
Height	6.97 metres	6.44 metres

- Reduced the total depth of the ground floor extension from 6m to 5.5m
- Reduced the depth of the first floor extension from 4.2m to 3.5m
- Increased the separation distance from the side extension to the boundary with no.16 by at least 0.4m
- Increased the separation distances from the first floor rear extension to both side boundaries by at least 1.5-1.9m (giving a total separation distance of at least 2.7-2.9 metres to both side boundaries)
- Removal of ground floor side window facing no.14
- Reduction in width of 2 first floor rear windows, one of which would be obscurely glazed
- Reduced the height of the first floor rear extension by 0.53m.
- As the reduction on the 1st floor would result in the loss of a bedroom and ensuite, this is proposed in the loft space with the introduction of a rear dormer

#### 4. RELEVANT PLANNING HISTORY

4.1 The following history is considered relevant to this application:

4.2 RU.21/1100- Double/single storey rear extension, two storey side extension, replacement of front double storey section, new front bay windows and roof canopy above porch (revised plans received 13/07/21) – refused 15/09/21 for the following reasons.

1. The proposal, by reason of the bulk, scale and mass of the enlargements to the dwelling, would fail to integrate with the street scene and host dwelling resulting in harm to the street scene and character of the area, contrary to Policy EE1 of the Runnymede 2030 Local Plan.
2. The proposal would result in a poor relationship to its directly adjacent neighbour number 16 Kingswood Close due to the bulk, scale and mass of the extensions proposed. This would result in both a loss of light and an overbearing impact, with adverse harm to their amenities, contrary to Policy EE1 of the Runnymede 2030 Local Plan, the Runnymede Design SPD 2021, and guidance in the NPPF.

Appeal dismissed 25/01/22. Please note the Inspector only upheld reason for refusal 2.

4.3 RU.21/0463 - Double/single storey rear extension, two storey/part single storey side extension, double storey front extension, new front bay windows and roof canopy above porch (revised description 10/05/21). Refused 21/05/21 for similar reasons as above apart from referring to the impact of the proposals on both adjacent neighbours due to the size, scale and mass of the extensions proposed in close proximity to the boundaries.

4.4 RU.20/1423 - Double storey rear extension, double storey side extension, double storey front extension, new front bay windows, roof canopy above porch single storey rear/side extension

with balcony at rear. Refused 12/02/21 for similar reasons as above apart from referring to the impact of the proposals on both adjacent neighbours due to the size, scale and mass of the extensions proposed in close proximity to the boundaries. Appeal dismissed

## **5 SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION**

- 5.1 National Planning Policy Framework and Guidance.
- 5.2 The Runnymede 2030 Local Plan was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.
- 5.3 SPGs which might be a material consideration in determination:  
Runnymede Design SPD (July 2021)

## **6. CONSULTATIONS CARRIED OUT**

### **Representations and comments from interested parties**

- 6.1 18 Neighbouring properties were consulted in addition to being advertised on the Council's website and 13 letters of representation were received in response to the original plans submitted which can be summarised as follows:
- The proposals have been changed very little from previous proposals
  - The length and height of the proposed rear extension so close to the shared boundary would have a dominant and overbearing effect on adjoining No. 14
  - The proposed side and rear extension would have an overbearing and intrusive effect on the living conditions to No.16
  - The development goes against Policy EE1, NPPF and PPG
  - Loss of views
  - A street facing facade that is too wide and tall, out of harmony with the area
  - Cramped form of development
  - Out of keeping with street scene and out of character with the area
  - Loss of light and privacy to neighbours
  - loss of light and overshadowing to immediate neighbours
  - The proposed materials are obtrusive and do not harmonise with the buildings in the Close
  - The summer house at the end of the garden has no permission
  - Development will destroy open view of the street
  - Proposed plans do not provide sufficient off street parking that is sympathetic to the style of the street
  - The results of the submitted Daylight, Sunlight, and Overshadowing Assessment is subjective

Following the receipt of the amended plans and further neighbour consultation in respect of these any further comments received will be reported in the addendum.

- 6.2 Englefield Green Village Residents Association responded on the original plans and considers that there has been very little change from application numbers RU.20/1423, RU.21/0463 and RU.21/1100 which were refused/dismissed at appeal and raises objection.

## **7. PLANNING CONSIDERATIONS**

- 7.1 In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The application site is located within the urban area where

the principle of such development is considered to be acceptable subject to detailed consideration. This must be considered in light of the presumption in favour of sustainable development advocated by the NPPF. The key planning matters are whether the current proposals have overcome the reason for the refusal regarding the impact upon neighbouring amenity and whether any of the design changes undermine the Inspectors previous conclusion that the proposal would not harm the host property or the street scene.

- 7.2 With regard to impact on the street scene the appeal inspector during his consideration of the appeal regarding ru.21/1100 concluded the following:

***“The appeal proposal would retain about 1m gap to both the side boundaries. In this respect the proposal would meet the requirements of the Runnymede Design Supplementary Planning Document 2021 Appendix 4 Householder Guide (the SPD).***

***As the roof of the proposed two storey side extension would be at the same height as the main roof there would be some conflict with the SPD. However, at the front, the hipped roof with projecting gable would be of the same form as the existing and would be in keeping with the street scene. Moreover, the projecting gable would be re-positioned so that the front elevation would be symmetrical.***

***There are other examples of substantial properties on Kingswood Close and the overall scale, mass and appearance of the proposal would not be out of character with the street scene. The appeal property is at a higher level than the properties across the street but, because of the setback from the roadside, it is not noticeably more prominent than other properties.***

***Various elevational materials including render are evident along Kingswood Close. Consequently, the use of render for the external walls would not be inappropriate and would avoid any potential problem of matching proposed and existing materials. I see no reason to suppose that the proposal would fail to integrate in the mixed style street scene.***

***Despite there being some conflict with the SPD in respect of the lack of subordination with the host dwelling, on balance I consider the appearance of the extended dwelling from the front would not harm the host property or the street scene.***

***At the rear the proposed three hipped roof design would be somewhat convoluted. However, this would mean the two storey extension roofs would be lower than the ridge of the host property resulting in less bulk above the eaves. The Council raises no specific concerns about the appearance from the sides or rear and I see no reason to come to a different conclusion.”***

The conclusions of the previous Inspector need to be given significant weight when assessing this current application

- 7.3 The introduction of the rear dormer which has been set in and down from the main roof and the reduction in the scale of the rear extension primarily at first floor do not result in changes that when compared with the previous scheme are at odds with the Inspectors previous conclusions. It is considered therefore that the proposed extensions would not harm the character and appearance of the host property or the street scene and would comply with Policy EE1 of the Runnymede 2030 Local Plan.
- 7.4 During the consideration of the previous application the Inspector raised concerns regarding the impact on adjoining neighbouring amenity, notably overbearingness and gloomy and oppressive outlook . In respect of No. 14 to the east, which is a two storey detached dwelling with rear conservatories, the proposed changes from the most recently refused scheme would amount to a further 0.5m reduction in the depth of the proposed single storey rear extension, a further 0.7m reduction in the depth of the proposed first floor rear extension, which would now also be set away from the side boundary by a further 1.5m giving a total separation of 2.7 m, a ground floor side window facing no.14 would be removed and the overall height of the extension has been reduced by 0.53m.



- 7.5 Both the single storey and first floor rear extensions would not breach the 60-and 45-degree splay lines from the neighbour's nearest window. Nevertheless, during the consideration of the appeal, the Inspector considered that despite this the Council's SPD states that the angles and dimensions cited are given to assist applicants but that individual cases will be considered on their own merits and thus concluded that the overall length and height of the proposed rear extensions so close to the shared boundary would have a dominant and overbearing effect on the outlook from the conservatories and garden of No 14 and would appear overbearing and would result in a gloomy and oppressive outlook for the occupiers of that property.
- 7.6 As a result of the above concerns, the current proposals have been reduced in length at both ground and first floors, the height has been reduced, and the separation distance to the shared boundary has increased.
- 7.7 In respect of No. 16 to the west, this is a single storey dwelling that extends deep into its plot and behind no.15 with a number of windows in the east side elevation, some of which are obscure glazed but the kitchen window and door are not. The bungalow is set away from the shared boundary with 2 approx. 2.3m high outbuildings sited in front of the kitchen window and door between the bungalow and the boundary. It is relevant that during the consideration of the recent appeal the Inspector considered that the outbuildings already impinge on the outlook and light to the side windows of No 16, however still concluded that the overall length and height of the proposed rear extensions so close to the shared boundary and projecting well above the outbuildings would have a dominant and overbearing effect on the outlook from the side windows and adjacent path at No 16 whether or not the kitchen counts as a habitable room and the extensions would result in gloomy and oppressive living conditions for occupiers of No 16.
- 7.8 As a result of the above concerns raised the current proposals have been reduced in length at both ground and first floors, the height has been reduced, and the separation distance to the shared boundary has increased which would result in a building to building separation distance of 4.8m from the ground floor rear extension and 6.3m from the first floor rear extension
- 7.9 As such given that the height, depth and width of the rear extension have been materially reduced the cumulative impact of these changes are considered to result in the extension having an acceptable impact on both neighbouring properties' amenities. By reducing the depth, width and height of the first-floor component it is not considered that the development would result in gloomy or oppressive living conditions or have an overbearing impact for the occupiers of no.16 or no. 14.
- 7.10 Thus, it is considered for these reasons that the proposed extensions would not have a harmful effect on the living conditions of the occupiers of the adjacent properties and would comply with Policy EE1 of the Runnymede 2030 Local Plan and refusal reason 2 of RU.21/1100 has been overcome.
- 7.11 In other matters, concerns have been raised about the provision of parking on site, however the site plan shows a driveway with sufficient space to park a number of vehicles. There are also no parking restrictions on the street and Officers have observed on street parking already taking place. Therefore, the development is considered to comply with the parking standards required by Policy SD4. Although a large amount of original hard and soft landscaping has been removed from the site the rear garden has since been landscaped with terracing and a new combination of hard and soft landscaping introduced in the rear garden, however as an Oak tree is covered by TPO 452 a condition is added to secure a gain in biodiversity to comply with Policy EE9.

## **8. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 8.1 The application proposes new residential development. Based on the submitted information, the internal floorspace would be increased by more than 100 sqm and therefore would be liable for a Community Infrastructure Levy contribution.

## **9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS**

- 9.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.

Consideration has been given to s149 of the Equality Act 2010 (as amended), which has imposed a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

## 10. CONCLUSIONS

- 10.1 The development is considered acceptable in terms of appearance and with harmful impacts on residential amenities. The application has overcome the previous reasons for refusal. There are no highway or parking impacts. The development has been assessed against the following Development Plan policies – EE1 and SD4 of the Runnymede 2030 Local Plan, the policies of the NPPF, guidance in the PPG, and other material considerations including third party representations. It has been concluded that the development would result in harm that would justify refusal in the public interest. The decision has been taken in compliance with the requirement of the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

## 11. FORMAL OFFICER RECOMMENDATION

***The CHDMBC be authorised to grant planning permission subject to the following planning conditions:***

### 1. Full application (standard time limit)

The development for which permission is hereby granted must be commenced not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

### 2. List of approved plans

The development hereby permitted shall not be carried out except in complete accordance with the following approved plans, Location Plan & Proposed Site Plan, Proposed Elevations & Floorplans, received 17/10/22.

### 3. External materials (approved as stated on form)

The development hereby permitted shall be constructed entirely of the materials stated on the submitted valid planning application form.

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

### 4. Obscure glazing

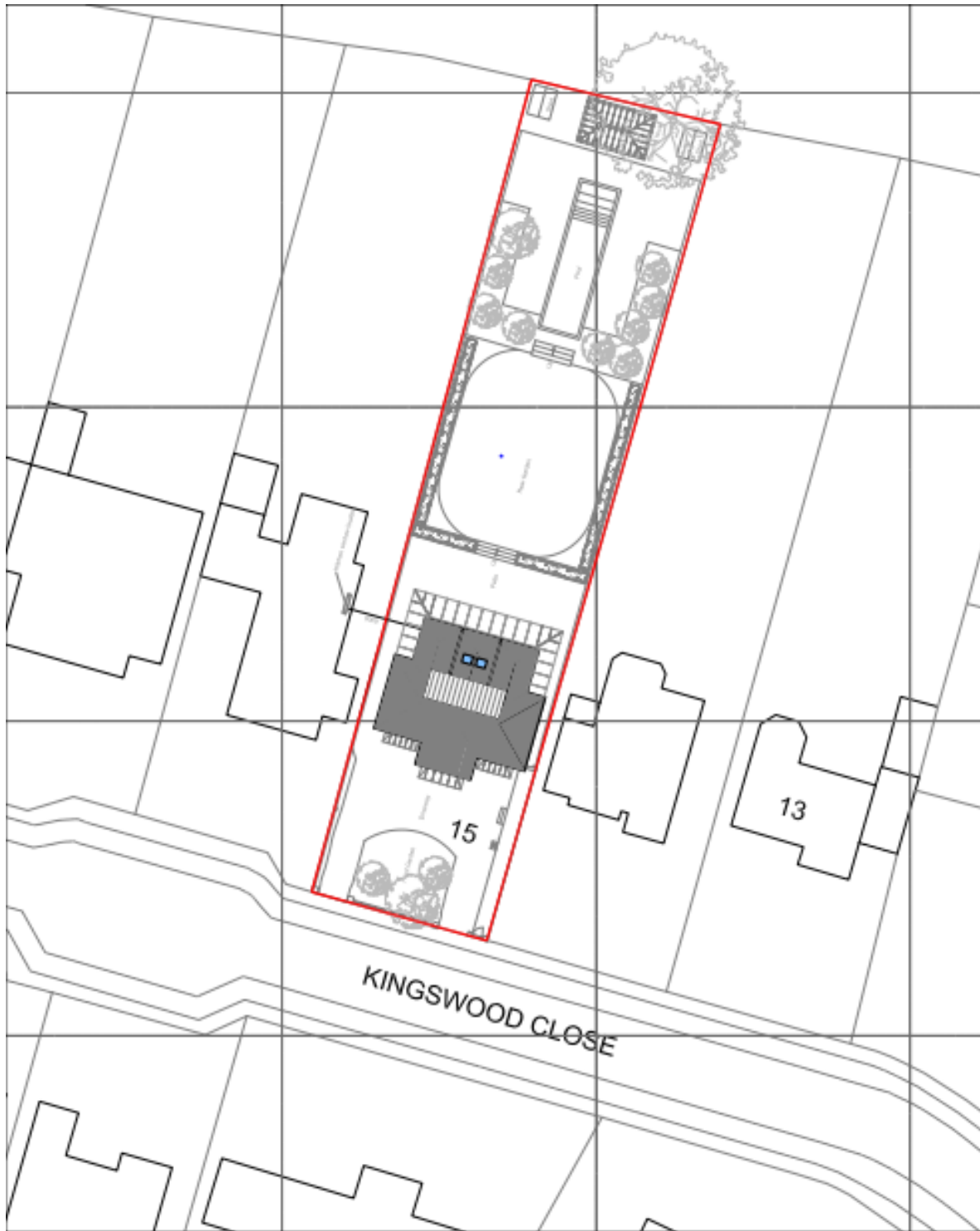
Before the first occupation of the extension hereby permitted, the first and second floor ensuite and stairwell window(s) in the rear elevation shall be fitted with obscured glazing (at Pilkington Glass Level 4 or equivalent) and any part of the window(s) that are less than 1.7 metres above the floor of the room in which they are installed shall be non-opening and fixed shut. The window(s) shall be permanently retained in that condition thereafter.

Reason: To avoid overlooking into the adjacent property and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

Informative:

1. The decision has been taken in compliance with the requirement in the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

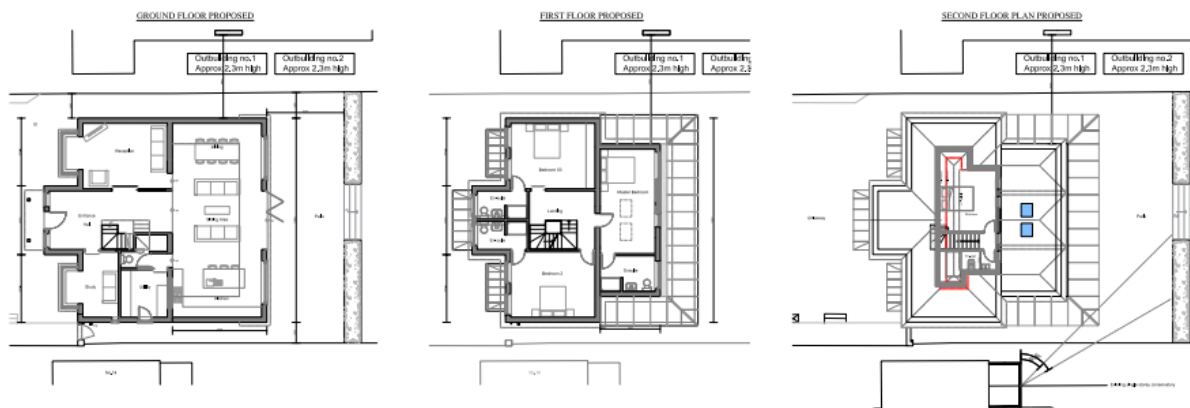
Site Plan



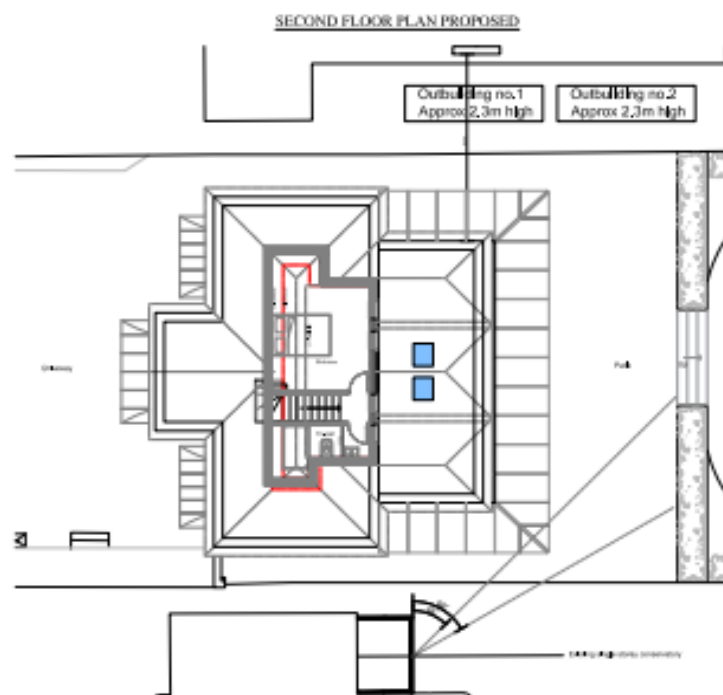
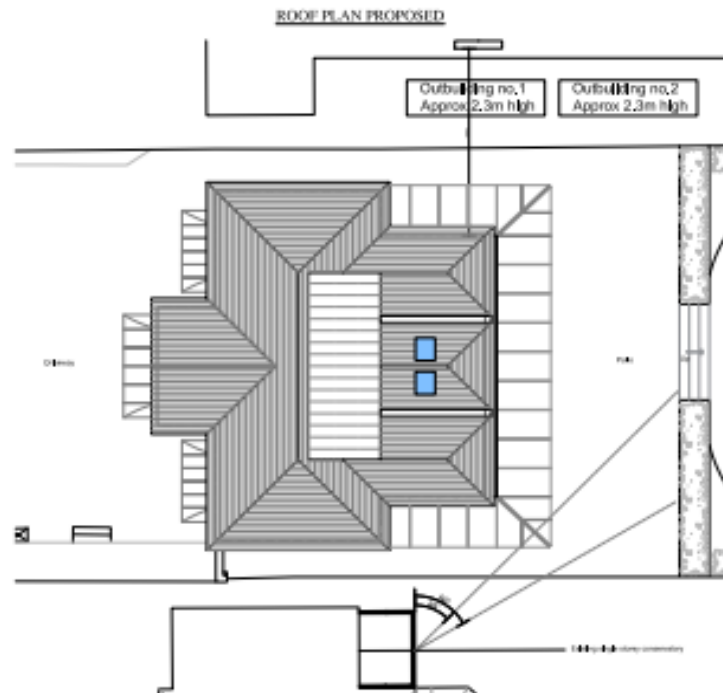
## Proposed Elevations



## Floor Plans



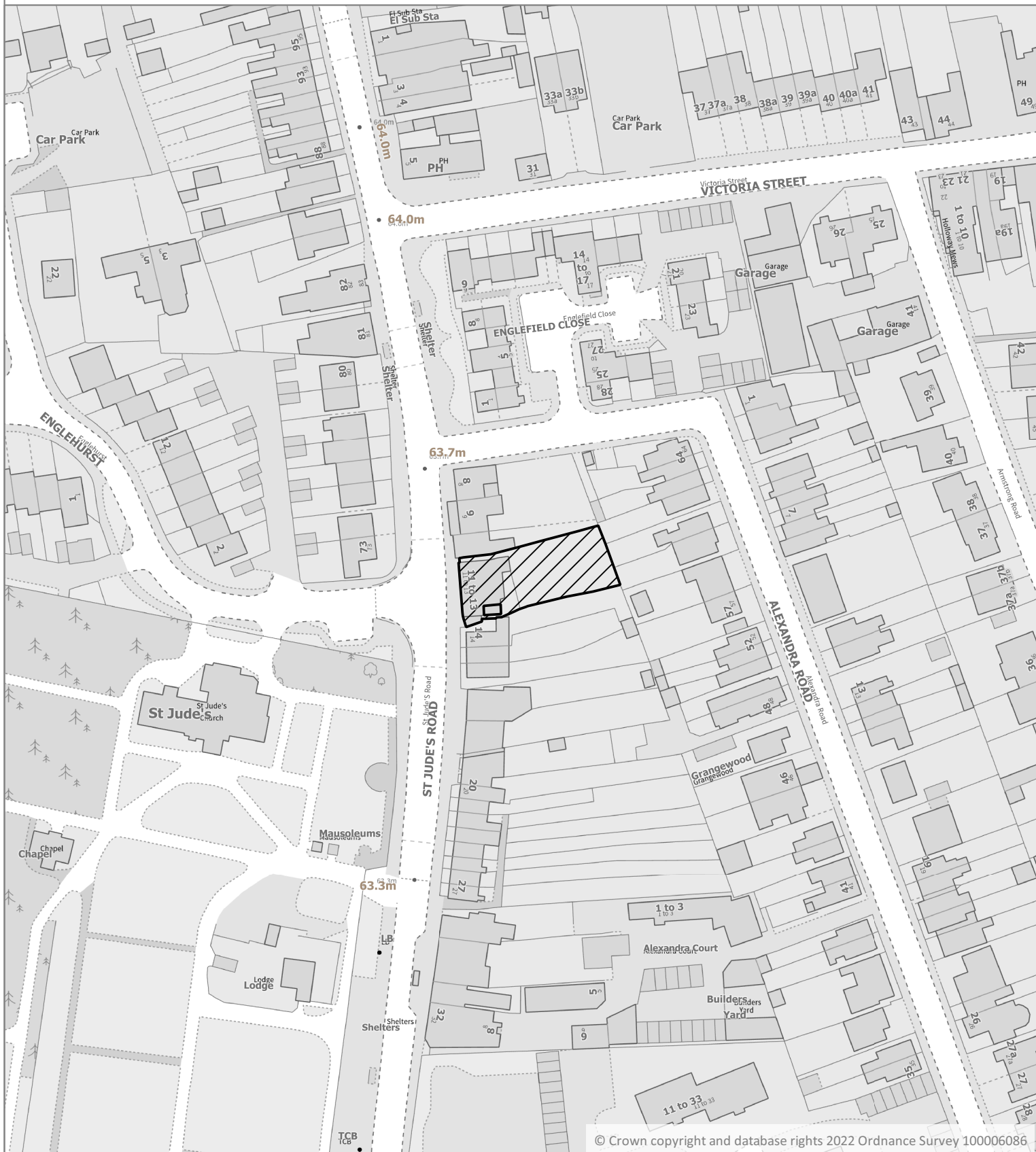
Site Layout





Date: 09/11/2022

**11-13 St Judes Road, Egham**



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Scale: 1:1,250

**RU.22/0270**

0 50 100 m



**COMMITTEE AGENDA REFERENCE: 5c**

<b>APPLICATION REF:</b>	<b>RJ.22/0270</b>
<b>LOCATION</b>	11-13 St Judes Road, Englefield Green, Surrey, TW20 0BY
<b>PROPOSAL</b>	Proposed alterations and extension to Basement store area, side and rear extension to Ground Floor Shop and 1st Floor Flat and a new Shop Front.
<b>TYPE</b>	Full Planning Permission
<b>EXPIRY DATE</b>	11/11/2022
<b>WARD</b>	Englefield Green East
<b>CASE OFFICER</b>	Jennifer Cade
<b>REASON FOR COMMITTEE DETERMINATION</b>	Number of letters of representation received.
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

**1. SUMMARY OF RECOMMENDATION**

<b>It is recommended the Planning Committee authorises the CHDMBC:</b>	
1.	<b>Grant Consent - subject to conditions</b>

**2. DETAILS OF THE SITE AND ITS SURROUNDINGS**

- 2.1 The site is located on the east side of St Jude's Road and comprises a two storey detached building at road level that drops down to an exposed basement level at the rear as the land falls away. There is a retail convenience shop at ground floor level which is also serviced from the basement with a flat above at first floor level. The building has a white render appearance with a low hipped roof and neighbours are of similar mixed commercial and residential buildings to the north with a residential terrace to the south. The site is within the Englefield Green local centre boundary and in a primary shopping area. The site is in the urban area.

**3. APPLICATION DETAILS**

- 3.1 The application seeks permission for a two storey rear extension, two storey side extension and new shop front. Amended plans have been received since the original application was submitted. Further amended plans have been received on 21/10/2022 and 27/10/2022 to correct some discrepancies in the plans.
- 3.2 The two storey rear extension would extend the existing shop and shop storage and would have a depth of 4.6 metres extending approximately 1.8 metres beyond the rear most elevation. The two storey rear extension would have a width of 11.7 metres and a ridge height of 6.7 metres with a lean too roof. Three windows and two doors will be inserted in exposed basement and two windows will be inserted at ground floor in the rear elevation.



- 3.3 The side extension would be single storey with a covered staircase going up to the first floor. The single storey flat roof element would have a ridge height of 3.3 metres and the covered stairway would have a ridge height of 5 metres. The side extension would have a maximum depth of 4.8 metres and width of 2.5 metres extending 0.9 metres beyond the existing side elevation at first floor. New timber doors are to be inserted in the front elevation with the shop fascia extended across. A roof light will be inserted in the front roof slope of the covered staircase and a window will be inserted in the rear elevation at first floor.
- 3.4 The new shop front involves blocking up the existing entrance and forming a new entrance, and changes to the design and arrangement of the windows and doors. An awning will be installed over the shop front. The plans also indicate new fascia signage, however this will require a separate advertisement consent.

#### 4. RELEVANT PLANNING HISTORY

- 4.1 The following history is considered relevant to this application:

Reference	Details
RU.19/1603	Installation of new external signage. Advertisement – Grant. 23/12/2019.
RU.16/0998	Proposed Rear & Side extension to allow for new staircases. Grant – 27/07/2016.
EGH.57/4639	Alterations to form one shop T.P.3 No.3652. Grant – 23/10/1957

#### 5 SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

- 5.1 National Planning Policy Framework and Guidance.
- 5.2 The Runnymede 2030 Local Plan was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.
- 5.3 SPGs which might be a material consideration in determination:  
Runnymede Design SPD (July 2021)
- 5.4 This site falls within the designated Englefield Green Neighbourhood Area. However, a Neighbourhood Plan has not been developed yet for this area.

#### 6. CONSULTATIONS CARRIED OUT

##### Consultees responses

Consultee	Comments
Englefield Green Village Neighbourhood Forum	Initially raised objection however following the receipt of amended plans previous objection has been withdrawn. Would like to see first floor windows in the front elevation changed to traditional timber

	windows. Agree with extended rear building line and that pitched roof is best with option for post office in the future.
<b>Thames Water</b>	No objection, informatives advised
<b>RBC Planning Policy</b>	The Englefield Green Neighbourhood Forum are currently preparing a draft of their Neighbourhood Plan to submit to the Council under regulation 14 (The Neighbourhood Planning (General) Regulations 2021). Therefore, as it has not reached this stage as of yet, it cannot be considered to have any weight in decision making.

## Representations and comments from interested parties

6.2 7 Neighbouring properties were consulted in addition to being advertised on the Council's website and 30 letters of representation have been received in regard to the original scheme which are summarised as follows:

- Concerns regarding reduced size of refuse storage area which is already causing problems
- Unclear whether bin storage area is for residential flat or shop or both
- Poorly designed and out of character with surrounding buildings
- Concerns regarding proposed modern and cheap looking materials with no mention of what will go in windows- coloured picture sheet, a display or shelves visible from outside?
- Materials should be sourced from sustainable sources
- Suggest wood should be used as the materials for the shopfront
- No objection to refit itself just the choice of materials proposed
- No provision for storage or disposal of incoming goods packaging
- Building is in historic core of Englefield Green. Emerging Neighbourhood Plan incorporates a set of design codes for the historic core. Details provided regarding retail/commercial development.
- Survival of St Judes Rd and Victoria Street as viable commercial areas depends on appearance of shop fronts and their attractiveness to visitors.
- Not a major retail centre so we have to create a harmonised street scene that will attract smaller businesses and shops.
- Suggest applicant is asked to revise application to conform to design codes, resolves offloading and bin management issues.
- Requests an improvement to the fascia
- Any alteration/ extension to shops and frontages should be seen as an opportunity to return them to Victorian heritage
- No proposal for outside cash point machine which would be a welcome addition
- No suitable rubbish bins outside- could sponsor/ pay for 2 bins outside
- A specific space outside for delivery would be useful and avoid causing problems in traffic flow
- SPAR brand is a large multinational company that offers support services for independently owned and operated food retail stores

Following the receipt of amended plans neighbours were reconsulted and a further 9 letters were received which can be summarised as follows:

- The amended plans address local resident concerns about the visual aspect of the shop front, the use of inappropriate material and the practicalities of dealing with refuse bins
- Pleased that the revised drawings show an increase in the size of the shop as I understand the increased floorspace will enable the applicant to apply to The Post Office for a counter which will be a positive social contribution to the whole village.
- Strongly support proposed post office counter
- Ask that extended shop front be in keeping with Victorian village with good provision for customer access, disabled access and bins
- Following amendments now supportive of the planning application

## **7. PLANNING CONSIDERATIONS**

- 7.1 In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The application site is located within the urban area where the principle of such development is considered to be acceptable subject to detailed consideration. This must be considered in light of the presumption in favour of sustainable development advocated by the NPPF. The key planning matters are the impact of the proposal on the visual amenities of the street scene and the impact on the residential amenity of neighbouring properties.
- 7.2 The proposal includes a new shop front for the existing retail convenience shop. The application site is within the primary shopping area of Englefield Green and the site will remain in its current use. A majority of the letters of representation initially received raised concerns about the design of the new shop front being too modern and out of keeping with the area. Since the original application was submitted officers have secured amended plans which among other changes have updated the proposed new shop front design to a more traditional design. Neighbours were reconsulted on the updated plans and letters of support for the new design were received (detailed in paragraph 6.2). Whilst the existing shop front is modern in design the proposed more traditional shop front design with smaller timber framed windowpanes, timber detailing and an awning over is considered to be a betterment in respect of the visual amenity of the street scene, and more in keeping with other shops along St Judes Road. Therefore, the proposal is considered to comply with Policies EE1 and IE6.
- 7.3 The plans show a fascia with signage however, the applicant would need to apply for advert consent for any advertisements proposed. An informative will be placed on the decision notice advising the applicant of this.
- 7.4 It is noted that several letters of representation have referenced the emerging Englefield Green Neighbourhood Plan. RBC Planning Policy has commented that the Englefield Green Neighbourhood Forum are currently preparing a draft of their Neighbourhood Plan to submit to the Council under regulation 14 (The Neighbourhood Planning (General) Regulations 2021). Therefore, as it has not reached this stage yet, it cannot be considered to have any weight in decision making.
- 7.5 The single storey side extension including the covered staircase would be visible from the street scene. The single storey element would replace existing timber doors with a corrugated roof and would infill the area to the side of the property. The shop front fascia would be

extended across the top of this element. Timber doors will be inserted in the front elevation which will act as access for the upper floor flat and for the commercial bins which will be stored in this area (as existing). The covered staircase would be similar in design to that at neighbouring property No. 10 St Judes Road. The extension would not extend further forwards than the existing property but would infill the area up to the side boundary. It would be higher than the existing timber gate but would maintain a separation distance of 1 metre to neighbouring residential property No. 14 St Judes Road which has no windows on this side elevation. Therefore, the proposed side extension is not considered to have a harmful impact on the street scene or the residential amenity of this residential property in compliance with Policy EE1.

- 7.6 With regard to residential amenity, the proposed two storey rear extension would have a maximum depth of 5.6 meters, however, would only extend 1.8 metres beyond the rearmost elevation closest to neighbouring property 10 St Judes Road and approximately 4.6 metres beyond the rearmost elevation closest to No. 14 St Judes Road. The proposed rear extension would be in line with the rear elevation of 10 St Judes Road and extend approximately 3.4 metres beyond the rear most elevation at No. 14 St Judes Road. It is noted that the ground floor of No. 10 is in commercial use with a residential flat above (10A St Judes Road) and No. 14 St Judes Road is a residential property. No. 14 has a single storey rear extension, and the proposed two storey rear extension would not break a 60 or 45 degree line from this property. The rear extension would have a lean too roof which is pitched in from the rear so is not considered to have an overbearing impact on either neighbouring property. No new windows are to be inserted in either side elevation and the separation distance to properties to the rear of the site is such that additional windows inserted in the rear elevation are not considered to result in any loss of privacy. Therefore, the proposed rear extension is not considered to have a harmful impact on the residential amenity of neighbouring properties and complies with Policy EE1.
- 7.7 The parking and access remain unaffected by the proposed development. As such it is not considered that the development would raise any issues in terms of highway safety and/or capacity. Timber doors are to be inserted in the proposed side extension which will serve as a bin store area for the retail unit and a side timber gate will be inserted in the gap between the boundary and the northern side elevation where the residential bin store will be (for the existing flat above). This ensures that residential and commercial waste are separated which is encouraged.

## **8. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 8.1 The application proposes a no new residential development and therefore would not be liable for a Community Infrastructure Levy contribution.

## **9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS**

- 9.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.

Consideration has been given to s149 of the Equality Act 2010 (as amended), which has imposed a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

## 10. CONCLUSIONS

- 10.1 The development has been assessed against the following Development Plan policies – EE1, IE6 and IE13 and of the Runnymede 2030 Local Plan, the policies of the NPPF, guidance in the PPG, and other material considerations including third party representations. It has been concluded that the development would not result in any harm that would justify refusal in the public interest. The decision has been taken in compliance with the requirement of the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

## 11. FORMAL OFFICER RECOMMENDATION

***The CHDMBC be authorised to grant planning permission subject to the following planning conditions:***

1 Full application (standard time limit)

The development for which permission is hereby granted must be commenced not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2 List of approved plans

The development hereby permitted shall not be carried out except in complete accordance with the following approved plans:

398/08 Rev D, 398/09 Rev F, 398/10 Rev F received 27/10/2022

398/05 Rev E, 398/06 Rev E, 398/07 Rev E received 21/10/2022

398/11 Rev B received 15/09/2022

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF

3 External materials (details required)

Before the above ground construction of the development hereby permitted is commenced, details of the materials to be used in the external elevations shall be submitted to and approved by the Local Planning Authority and no variations in such materials when approved. Development shall be carried out in accordance with the approved details.

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

**Informatives:**

1 Summary of Reasons to Grant Consent

The decision has been taken in compliance with the requirement in the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

2 Advertisement Control

The applicant is advised that advertisement consent may be required for any new signs on the property.

3 Land Ownership

The applicant is advised that this planning permission does not convey the right to enter onto or build on land not within his ownership.

4 Party Wall Act 1996

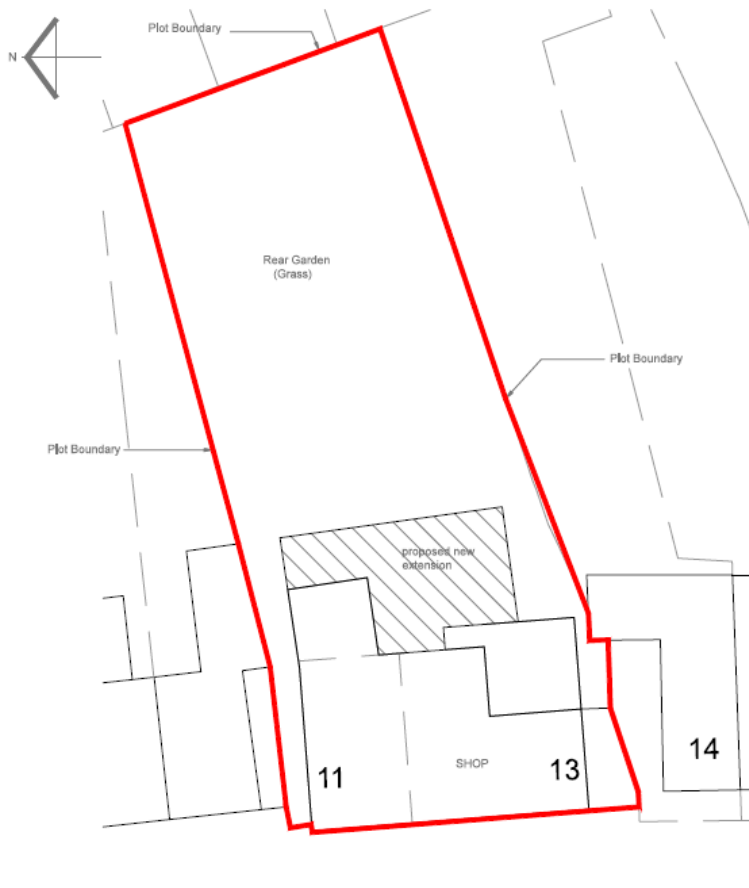
The applicant's attention is drawn to the Party Wall Act 1996 which sets out requirements for notice to be given to relevant adjoining owners of intended works on a shared wall, on a boundary or if excavations are to be carried out near a neighbouring building.

**RU.22/0270 11-13 St Judes Road, Englefield Green**

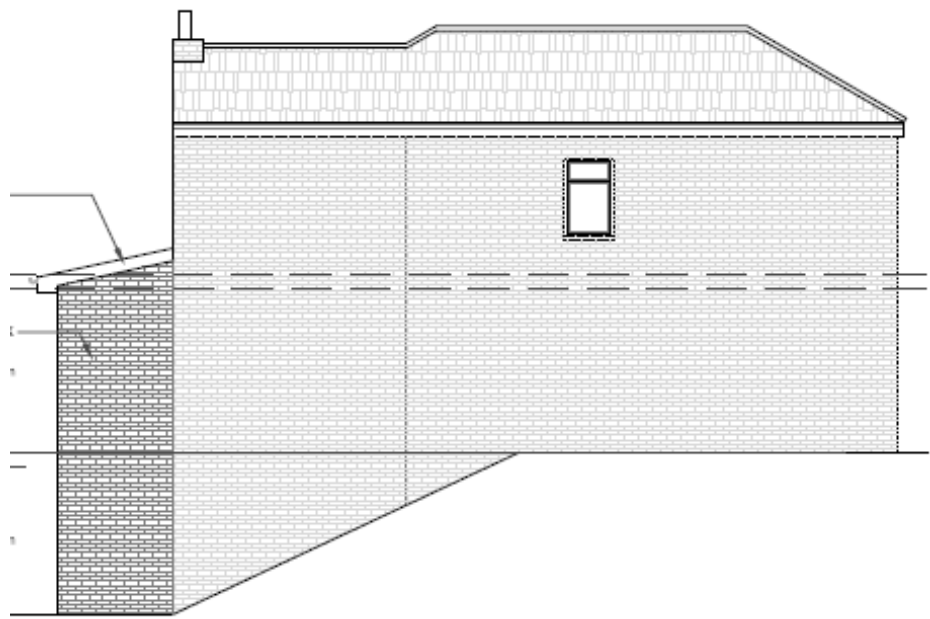
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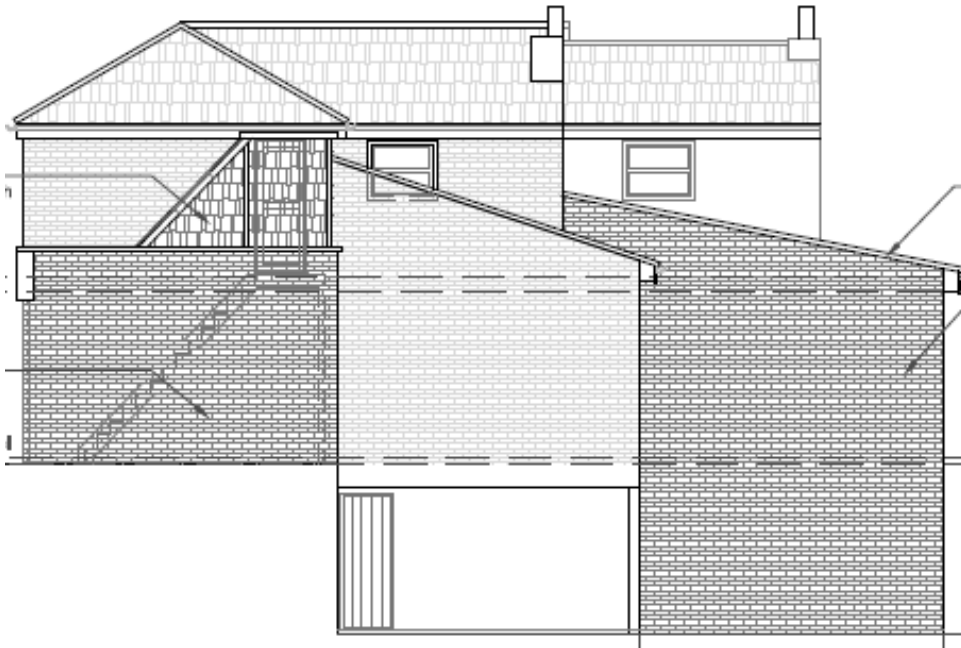
**Proposed Site Plan**



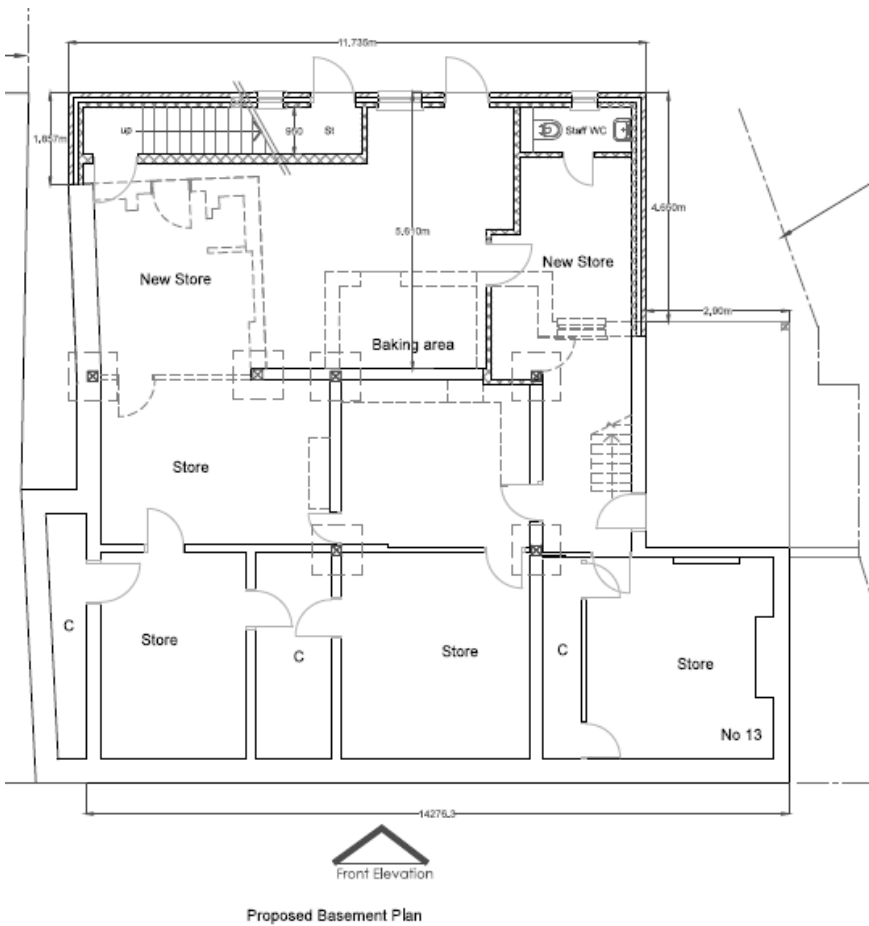
**Proposed Elevations**

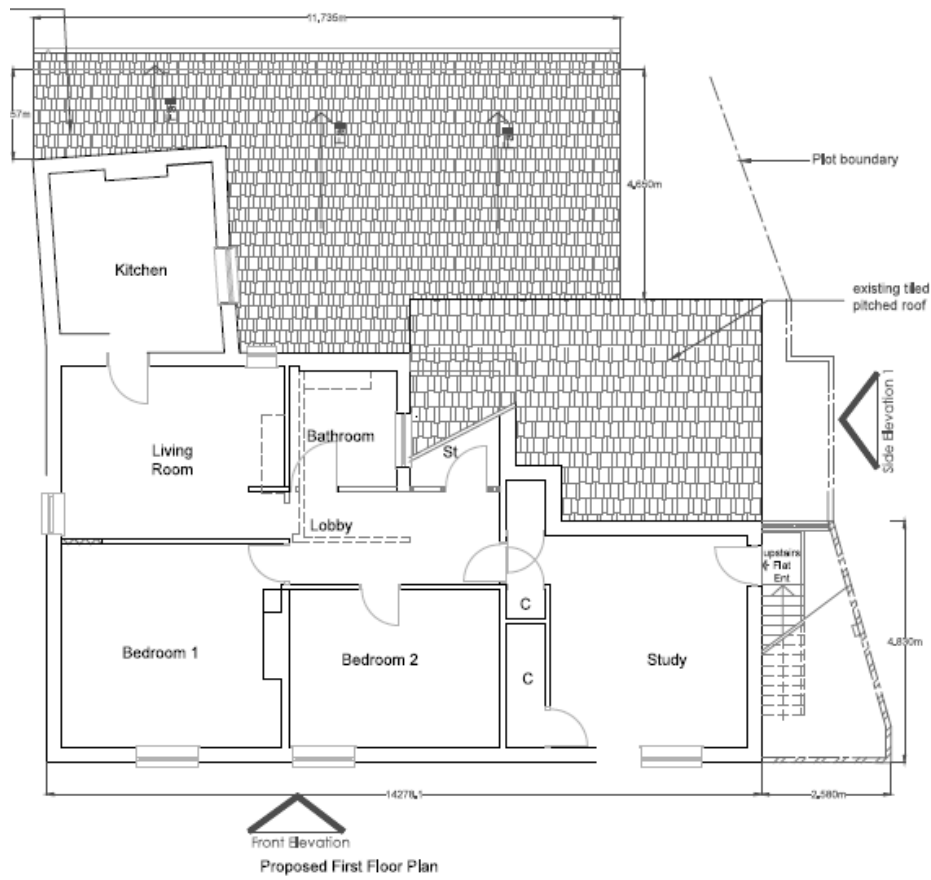
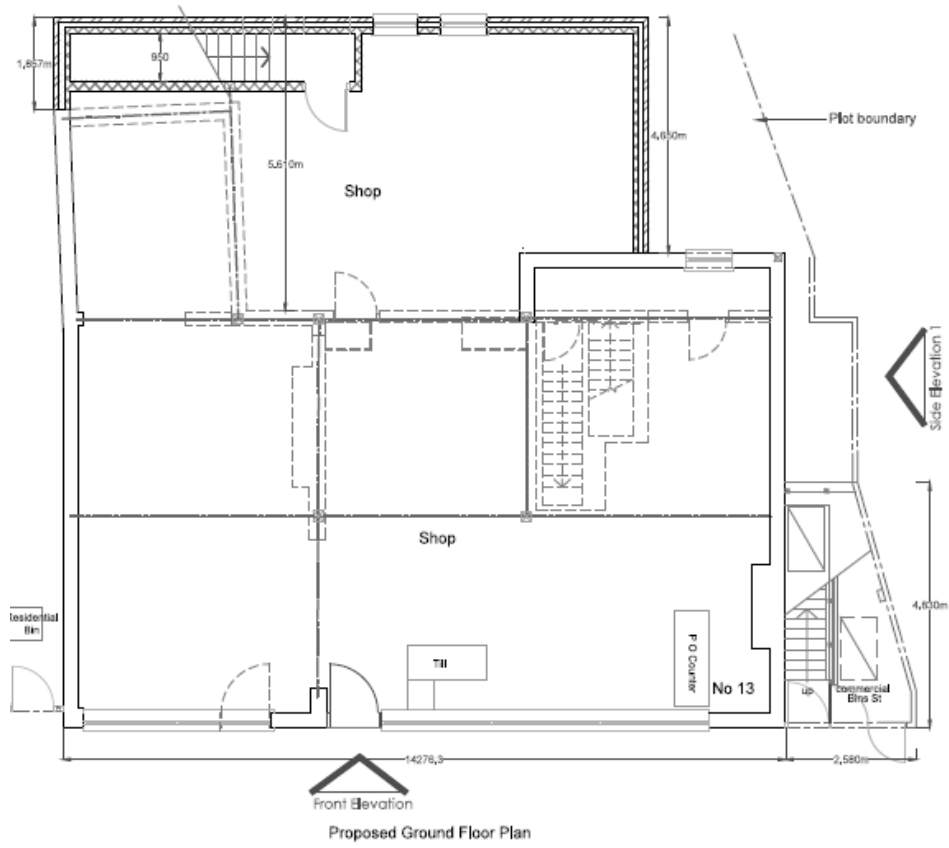


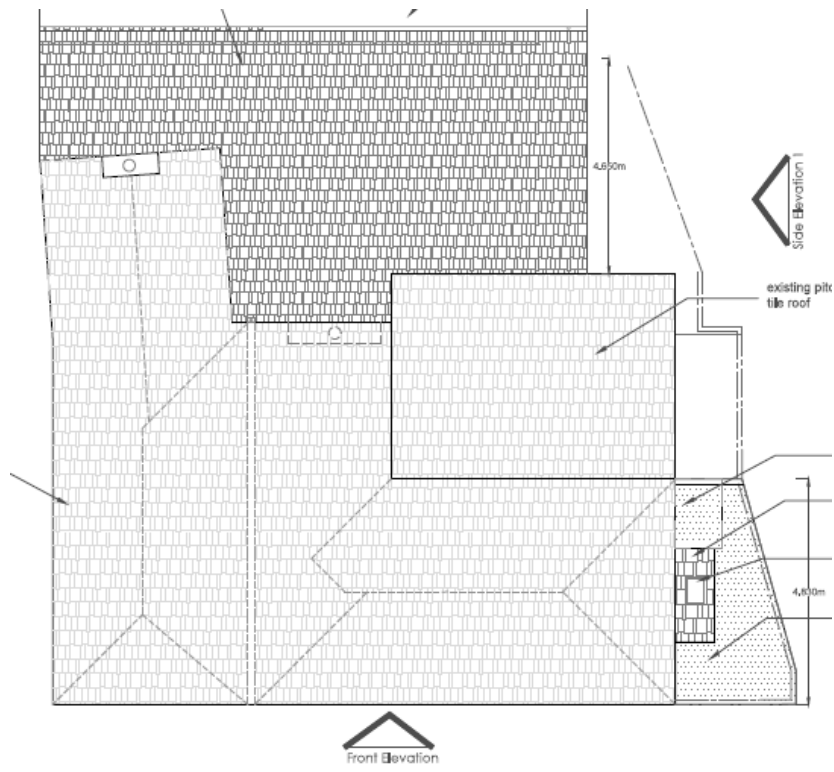




**Proposed Floor Plans**





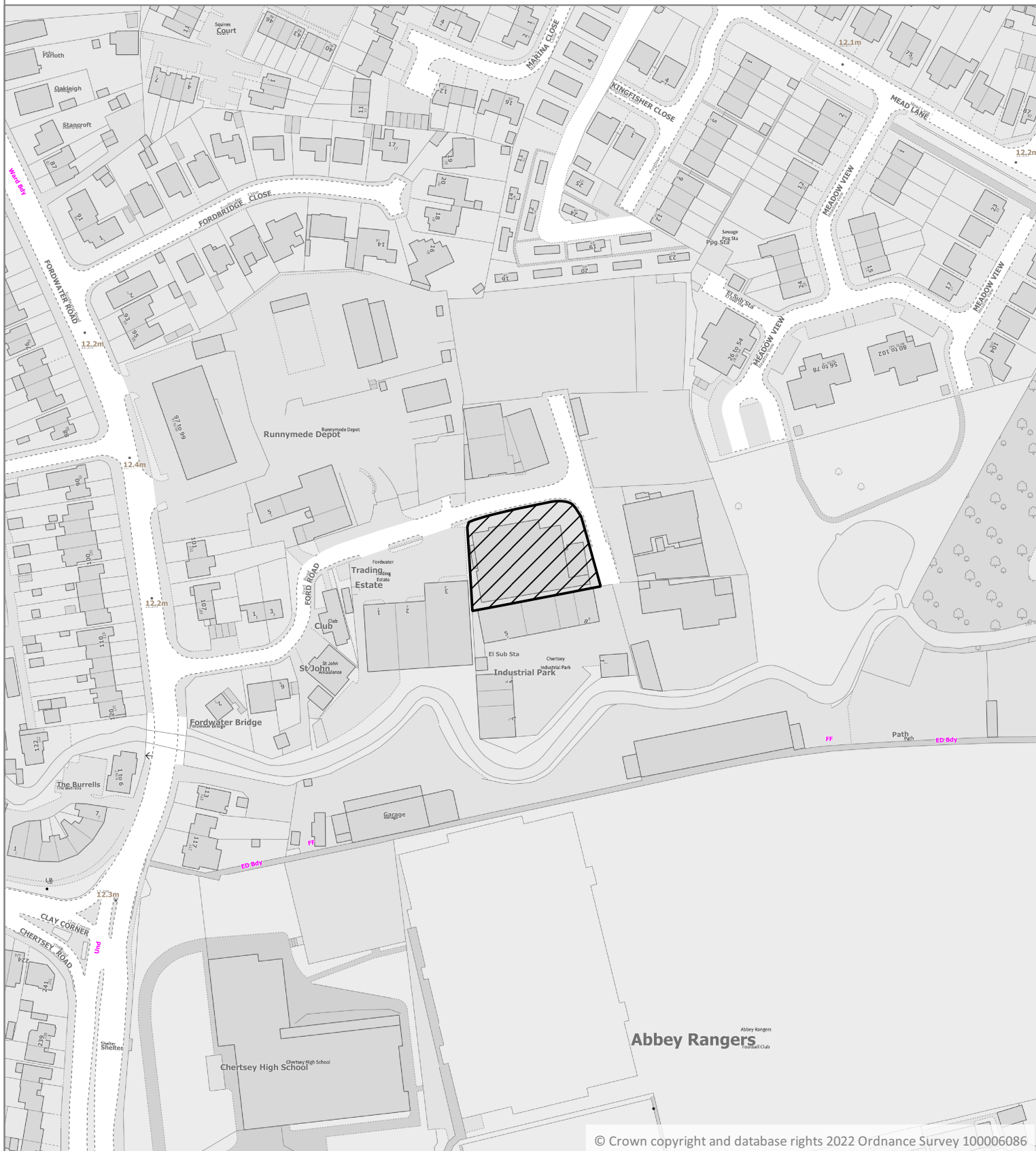


Proposed Roof Plan



Date: 09/11/2022

**Unit 7, Fordwater Trading Estate, Chertsey**



Scale: 1:2,000

0 50 100 m

**RU.22/0729**



## COMMITTEE AGENDA REFERENCE: (5d)

<b>APPLICATION REF:</b>	<b>RU.22/0729</b>
<b>LOCATION</b>	Unit 7 Fordwater Trading Estate Medcalf And Co Limited Ford Road Chertsey KT16 8HG
<b>PROPOSAL</b>	Redevelopment of existing industrial/commercial site to provide a new industrial/ commercial unit.
<b>TYPE</b>	FULL
<b>EXPIRY DATE</b>	08/08/22
<b>WARD</b>	Chertsey Meads
<b>CASE OFFICER</b>	Katherine Appleby
<b>REASON FOR COMMITTEE DETERMINATION</b>	Major Development
<i>If you have questions about this report please contact Ashley Smith, Victoria Gibson or the case officer.</i>	

### 1. SUMMARY OF RECOMMENDATION

<b>It is recommended the Planning Committee authorises the CHDMBC:</b>	
1.	<b>To approve the application subject to the completion of planning conditions</b>

### 2. DETAILS OF THE SITE AND ITS SURROUNDINGS

- 2.1 The site has an area of 0.16 ha and is in the centre of the Fordwater Trading Estate which is bordered to the south by The Bourne river with open space beyond and to the east, with residential to the north and west. The site comprises of a vacant 1950's warehouse style building and associated workshops/stores. The overall estate is used for a variety of industrial purposes and the use of the application site was an industrial and light engineering use until August 2020. The main building on the site has a floor area of approx. 979 sq. metres. The accommodation is broken up into smaller areas, within each building element on the site. Loading bays exist at opposite ends of the building, one being a high bay and the other low. Ad-hoc spaces exist for parking of approximately 18 to 20 vehicles. Access to the site and the building is unrestricted on the two sides fronting onto the public highway.
- 2.2 The site is located within the urban area and a large part of the site is within flood zone 2.

### 3. APPLICATION DETAILS

- 3.1 This is a full planning application for the redevelopment of the existing industrial/commercial site to provide a new industrial/ commercial unit. The proposal is for a single building of 941 square metres on the ground floor area and 94 square metres on the first floor.
- 3.2 The proposed new building would occupy much of the footprint of the existing building group, albeit slightly smaller in area terms. The accommodation will be housed in a single unit and a single loading bay will be provided at one end of the building, closest to the main road. All access from the highway would be from the designated gateway, with all other accesses cut-

off by palisade fencing, on site turning for delivery vans and small lorries would be provided. The site will be secured and fully fenced, with a sliding site access gates in front of the loading doors. Secure parking will be provided on site for 12 cars and 8 cycles. A designated refuse station is proposed, accessed directly off the highway. There is a separate access for the designated cycle parking and pedestrian access will be via a designated pedestrian gate located close to the office entrance.

- 3.3 The building would be rectangular in shape and approx.42 metres in length by 22 metres in width with a flat roof including stairs to access a mezzanine level and would be constructed in insulated cladding with aluminium windows, doors and large vehicle loading doors. The proposed building is the same height as the immediately adjacent scheme to the south completed in 2019, and of the same scale as the adjacent units to the west. Anti-ram bollards and an Armco barrier will be used for protection of the building from vehicles. The site will be enclosed on all boundaries by painted steel palisade fencing, and a sliding gateway to the site and match that of the other two more modern neighbours. The entire site is currently covered in hardstanding but under this proposal a small strip along the western boundary adjacent to the line of trees on the neighbouring site will be turned to soft ground. PV panels have been indicated on the flat roof of the proposed building.
- 3.5 Various documents have been submitted with the application including a Design and Access Statement, Bat Emergence Survey Report, Landscape and Ecological Management Plan (LEMP), Transport Statement, Odour Assessment, Noise Survey, Ecological Habitat Survey Report, Sequential Test, FRA, Surface Water Drainage and SuDS Strategy Report, Ground Investigation Report and Energy Statement.
- 3.6 According to the applicant the development design ethos echoes modern industrial estate developments nationally and accords with similar industrial developments and in particular matches that of the adjacent Plot 8 which was completed in 2019.

#### 4. RELEVANT PLANNING HISTORY

- 4.1 There appears to be a significant planning history going back many years for the site, however the most recent and relevant application relating to this unit is:

Reference	Details
CHE.8075	Erection of eight buildings for light industrial purposes K/as Plots 1-8 Fordwater Trading Estate, Ford Road Grant Consent 23/10/1952
CHE.10994	Erection of a new store shed Grant Consent 29/11/1956
CHE.11997	Erection of additional workshop Grant Consent 03/06/1958
CHE.13813	Erection of factory extension Grant Consent 23/05/1960
CHE.16821	Erection of single storey office building Grant Consent 30/09/1963
CHE.21980	Construction of a single storey steel store, extension of existing offices and addition of a first floor of offices Grant Consent 11/08/1969
RU.83/0073	Single storey extension to existing factory building and provision of 22 parking spaces Grant Consent 07/06/1983

#### 5 SUMMARY OF MAIN RELEVANT STRATEGIES AND POLICIES RELEVANT TO THE DECISION

- 5.1 National Planning Policy Framework and Guidance.
- 5.2 The Runnymede 2030 Local Plan was adopted on 16 July 2020 and the policies have to be read as a whole. Any specific key policies will be referred to in the planning considerations.
- 5.3 SPDs which might be a material consideration in determination:  
Design Guide  
Green and Blue Infrastructure  
Car Parking (2001)

**6. CONSULTATIONS CARRIED OUT**

<b>Consultee</b>	<b>Comments</b>
<b>Environment Agency</b>	No objection
<b>RBC Contaminated Land Officer</b>	No objection subject to conditions
<b>SCC County Highway Authority</b>	No objection subject to conditions
<b>SCC Lead Local Flood Authority</b>	No objection subject to conditions
<b>RBC Drainage Engineer</b>	No objection subject to conditions
<b>Surrey Wildlife Trust</b>	No objection
<b>RBC Environmental Health Officer</b>	No objection subject to condition

- 6.1 **Representations and comments from interested parties**
- 6.2 13 Neighbouring properties were consulted in addition to being advertised on the Council's website and no letters of representation have been received.

**7. PLANNING CONSIDERATIONS**

Principle and Quantum of Development

- 7.1 In the determination of this application regard must be had to the Development Plan and National policy within the NPPF. The application site is located within the urban area where the principle of such development is considered to be acceptable subject to detailed consideration. This must be considered in light of the presumption in favour of sustainable development advocated by the NPPF. The key planning matters are the principle of the development of the site in this flood zone, the impact of the proposal on the character and visual amenities of the area and on the residential amenities of neighbouring properties as well as on the future occupiers and on flood risk, drainage, highway safety and parking.
- 7.2 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development which consists of three roles; An economic role, social role and environmental role and confirms that the planning system should do everything it can to support sustainable economic growth and that planning should operate to encourage and not act as a pediment to sustainable growth. The application site formed part of a wider ELR site (C2), which covered a number of buildings, however The Runnymede 2030 Local Plan has since been adopted and Policy IE3: Catering for modern business needs is relevant. Indeed, the first bullet point states that the Council will support proposals to redevelop outmoded employment floorspace to cater for modern business needs.

- 7.3 The site is a brownfield site listed in the Council's Employment Land Review as an established employment site. The proposed scheme is to provide a flexible and modern employment unit and therefore complies with Policy IE3.

#### Design, Layout and Impact on Character and Appearance of the Area

- 7.4 The existing industrial / commercial unit is of poor design / constructional / and architectural quality. The proposal represents an enhancement to the character and appearance of the Fordwater Industrial Estate and the general street scene. The application will allow the removal of a tired and dated looking building, with many inherent logistical, environmental, amenity, and health faults. The proposed replacement building will deliver a building 'fit for purpose' in all regards, and sustain employment uses on the site for the foreseeable future and represents a scheme of quality, commensurate with a modern industrial estate. The materiality and use of appropriately coloured cladding will provide a far more contextual relationship to the surroundings. The application will help secure the long-term future of the site. The proposals represent a holistic and cohesive approach to development.
- 7.5 The proposed building would be located within a site comprising commercial uses and would be in keeping with this form and type of development. It is therefore considered the proposal would represent a high quality design and would fit in with the scale and grain of the general pattern of development in the vicinity of the area. As such the layout and design would respect and enhance the townscape and would not be harmful to the established character and appearance of the surrounding area in accordance with Policy EE1.

#### Connectively and Highway Considerations

- 7.6 Car parking within the existing site is uncontrolled, such that vehicles become blocked in and pedestrians using the footpath are endangered. The existing access on to the site is facilitated along all frontages to Ford Road, by way of a dropped kerb throughout. The length of this dropped kerb is presently in the order of 80 metres in length. The proposal allows for the complete reinstatement of the highway kerb, with the whole site being enclosed by fencing and a single highway access by way of a gated access point with an 11 metre dropped kerb cross-over at the closest point to the Fordwater Road junction.
- 7.7 12 parking spaces, 2 loading bays and 8 cycle spaces are proposed along with 3-point turning areas. The proposal allows for a clear route in and out of the site, with ample turning room for 12 cars and 2 vans. The County Highway Authority have undertaken a site visit and an assessment in terms of the likely net additional traffic generation, access arrangements and parking provision and raises no objection subject to conditions requiring the access to be provided as shown, the submission of a Construction Transport Management Plan as well as the provision of at least 20% of the available parking spaces with a fast charge socket. It is therefore considered that no additional traffic or highway issues have arisen from this current proposal and the scheme satisfies Policy SD4.

#### Trees and Ecology

- 7.8 The existing site is concrete hardstanding with no soft landscaping. However, there are six immature silver birch and alder trees on the boundary of the adjacent site to the west. As such, due to the lack of habitats on the site itself, no biodiversity loss is anticipated. Nevertheless, any development should not adversely affect the ecological interests of the site, indeed any future application should be an opportunity to improve the biodiversity of the area.
- 7.9 An Ecological Habitat Survey Report (Hone Ecology 17/03/22) and a Bat Emergence Survey Report (Sylvatica Ecology Ltd 17<sup>th</sup> July 2022) have been submitted with the application which considers the ecology of the site. A bat survey has recently been carried out during which no bats were seen to emerge from the building within the site which were assessed as having low potential to support roosting bats, however the new building works will include opportunities for roosting for bats.



- 7.10 Surrey Wildlife Trust raises no objections subject to compliance with the submitted Landscape and Ecological Management Plan (LEMP) and biodiversity enhancement to include bat boxes. The proposed scheme will also provide a strip of soft land within the site between the western boundary and proposed built development as an ecological area and this together with the proposed enhancements will result in a betterment for biodiversity. Therefore, in combination with the successful implementation of the avoidance, mitigation and enhancement measures set out in the above-mentioned submission documents and subject to safeguarding conditions, it is considered that the proposed development can be carried out without any harmful impacts on protected species or habitats and the scheme complies with Policies EE1, EE9 and EE11.

#### Energy

- 7.11 Policy SD8 requires development of 1,000sqm or more to meet 10% of that development's energy requirements from renewable and/or low carbon technologies and new policy SD7 promotes sustainable design. The applicant has submitted an Energy Assessment which indicates that it is proposed to install a PV system on the roof of the proposed building. An example of PV panel configuration would be 36 No Panels installed facing south at a 15 degree pitch. Such a proposed system could generate 6,989 kWh electricity per year which represents an annual saving of 3,627 kgCO<sub>2</sub>. However, no further details of measures have been provided and therefore conditions are recommended to secure this and in respect of water efficiency, and the proposal complies with the policies SD7 and SD8 and the NPPF.

#### Land Contamination

- 7.12 No objections have been raised by the Council's Contaminated Land Officer subject to conditions securing the installation of a ground gas or vapour protective membrane in compliance with Policy EE2 of the Runnymede 2030 Local Plan.

#### Noise and Air Quality Management

- 7.13 The current use is not controlled by any conditions limiting noise. It is thus concluded that the new development will not exacerbate the current noise impacts but could reduce them. In view of the location of the site to residential properties and as the final user of the site is not yet known, a condition is recommended for a noise mitigation scheme to be submitted to demonstrate that noise levels created by the proposed new development are to be no less than 10 dB below existing background noise levels. If there is an exception in the future, given the flexible use requested, it is considered that such matters (as well as odour potential) would be dealt with under Environmental Health regulations. It is for these reasons the proposed development can be considered to be in accordance with Policy EE2 of the Local Plan and relevant policies in the NPPF in relation to noise and air.

#### Flood Risk and Drainage

- 7.14 Policy EE13 states that new development will be guided to areas of lowest flood risk from all sources of flooding through the application of the Sequential Test. The site has been a commercial site for a number of years and the building subject to this application would replace previous buildings which are in poor condition. The applicant has submitted a Sequential Test to demonstrate that there are no other employment use sites available within a lower flood risk zone. It does identify other sites, but these are in the same flood risk zone and are previously developed the same as the application site. These sites are significantly less well positioned or able to provide the same sized building / site than the application building / site and do not, therefore, provide an alternative to the Application site. In accordance with the NPPF the Sequential Test has been applied and met. Safe access and egress does not exist for the site, however as the proposal is for redevelopment of an existing industrial / commercial site to provide a new industrial / commercial unit, it will not increase the flood risk vulnerability classification of the site and safe access and egress is expected to be maintained as existing. The Environment Agency do not wish to comment on the proposal and no objections have been received from RBC Drainage. The proposal is considered to comply with policy EE13.
- 7.15 The current site is completely covered in hardsurfacing and ancillary workshops / stores buildings / car parking and is predominately located in Flood zone 2. The proposed

development is classed as a 'less vulnerable' development in accordance with NPPF and the site is already developed with a less vulnerable development and the proposed development will remain in this vulnerability classification thus, not increasing the risk to people. The Flood Risk Assessment submitted in support of the planning application demonstrates that as the lowest site level is 13.13 mAOD and the design flood level is set at 12.54 mAOD the building's floor level will be above the required 300mm above design flood level, but additionally the level of the floor is to be set at 13.80 mAOD taking it well clear of any likely flood water such that the site can be developed without any risk of increased flooding of the site or its surroundings and the impact on flood storage is the same.

- 7.16 Surrey County Council as Lead Local Flood Authority (LLFA) is satisfied the proposals meet the requirements set out in the technical Standard and Planning Policy Guidance. It is therefore considered that the site can deal with surface water drainage for the development in a sustainable manner which complies with the NPPF. The details of the drainage scheme can be secured by conditions as recommended by the LLFA.

#### Impact on Neighbouring Amenities

- 7.17 The nearest existing residential properties are located a substantial distance away from the site, to the west and north. As such it is considered that the proposed building would not have an overbearing or overly dominant visual impact or result in any material loss of privacy or overlooking to neighbouring properties. The massing, height, scale and form of the building would be similar to the neighbouring and recently constructed Plot 8. It is also considered that these separation distances, coupled with the orientation and form of the proposed development would not have a significant impact upon the residential amenities with regard to noise or odour and as such the proposal complies with Policy EE1.

### **8. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY (CIL)**

- 8.1 The application does not propose new residential or office development and therefore would not be liable for a Community Infrastructure Levy contribution.

### **9. EQUALITY AND HUMAN RIGHTS CONSIDERATIONS**

- 9.1 Consideration has been given to Articles 1 and 8 of the First Protocol of the European Convention on Human Rights. It is not considered that the decision would result in a violation of any person's rights under the Convention.

Consideration has been given to s149 of the Equality Act 2010 (as amended), which imposes a public sector equality duty that requires a public authority in the exercise of its functions to have due regard to the need to:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

It is considered that the decision would have regard to this duty.

### **10. CONCLUSIONS**

- 10.1 The proposal involves the improvement of an accessible brownfield site to reprovide an employment building. The layout would maintain the residential amenities of neighbouring residential occupiers. Vehicle movements would not increase significantly and would not harm highway safety. The proposals would not increase flood risk and will improve the biodiversity of the site. The proposals are considered acceptable in compliance with saved Policies SD3, SD4, SD7, SD8, EE1, EE2, EE9, EE11, EE12, EE13, and IE3 of the Runnymede 2030 Local Plan Local Plan and the NPPF. It has been concluded that the development would not result in any harm that would justify refusal in the public interest. The decision has been taken in

compliance with the requirement of the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

## 11. FORMAL OFFICER RECOMMENDATION

***The CHDMBC be authorised to grant planning permission subject to the following planning conditions:***

1 Time

The development for which permission is hereby granted must be commenced not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with Section 51 of Part 4 of the Planning and Compulsory Purchase Act 2004.

2 List of approved plans

The development hereby permitted shall not be carried out except in complete accordance with the following approved plans -

1434\_219-Axonometric Massing Model, 1434\_218-3D Views Indesign, 1434\_217-Proposed Typical Section, 1434\_215-Proposed Building Elevations 1, 1434\_214-Proposed Site Elevations, 1434\_213-Proposed Mezzanine Floor Layouts, 1434\_212-Proposed Ground Floor Layouts, 1434\_211-Proposed Roof Plan, 1434\_210-Proposed Site Plan, received 04/05/22 and 1434\_216A-Proposed Building Elevations 2 received 04/07/22

Reason: To ensure high quality design and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF.

3 Materials as stated on application form

The development hereby permitted shall be constructed entirely of the materials stated in the submitted valid planning application form unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that the proposed works harmonise with that existing in the interests of visual amenity and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance in the NPPF.

4 Use

The use of the unit hereby permitted shall be limited to uses within any of the following uses classes: Class E(g) (iii) (Light industrial) with ancillary office accommodation, and for no other purpose in Class E of the Town and County Planning (Use Classes Order 1987) (as amended) and the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order, without the prior approval, in writing of the Planning Authority.

Reason: To restrict the use of the premises in the interest of the amenities of the area and to prevent the intensification of the use of the site and to maintain the amenities of the nearby residential properties and to comply with Policy IE3 of the Runnymede 2030 Local Plan and guidance in the NPPF.

5 Protective Membrane

Before the commencement of the above ground construction of the development hereby permitted, details of the ground gas or vapour protective membrane (regarding ground gas or vapour migration pathways) which is to be laid under the floor of the development hereby

approved, shall be submitted to and approved in writing by the Local Planning Authority. Details should include a detailed plan of where the membrane is to be installed, the name and model number of the membrane to be deployed and details as to how the membrane is to be installed and who by. Following approval of the plan, the membrane shall be laid in accordance with the approved plan. The membrane is to be retained for the life of the development.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and to comply with the NPPF.

## 6 Implementation of Gas Membrane

Within two weeks of installation of the approved ground gas or vapour protective membrane (regarding ground gas or vapour migration pathways), details of how the approved membrane was installed including proof of purchase and photographic evidence of installation shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and to comply with the NPPF.

## 7 Noise (Acoustic insulation and ventilation)

No above ground development shall commence until a noise mitigation scheme has been submitted to and approved in writing by the local planning authority. The submitted scheme shall demonstrate that noise levels created by the proposed new development are to be no less than 10 dB below existing background noise levels. Development shall be carried out in accordance with the approved details prior to occupation of any part of the development, or in accordance with an alternative timetable to be agreed in writing with the local planning authority.

Reason: To protect the amenities of occupiers of the development and to comply with Policy EE2 of the Runnymede 2030 Local Plan and guidance within the NPPF.

## 8 Surface Water Drainage

The construction of the drainage system shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority.

The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) The results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
- b) Evidence that the proposed final solution will effectively manage the 1 in 30 & 1 in 100 (+40% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 2 l/s.
- c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross

sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).

d) A plan showing exceedance flows (i.e., during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

e) Details of drainage management responsibilities and maintenance regimes for the drainage system.

f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and that the final drainage design does not increase flood risk on or off site and to comply with Policies SD7, EE12 and EE13 of the Runnymede 2030 Local Plan and guidance within the NPPF.

## 9 Verification Report SUDS

Prior to the first occupation of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS and to comply with Policies SD7, EE12 and EE13 of the Runnymede 2030 Local Plan and guidance within the NPPF.

## 10 Flood Risk Assessment

The development hereby permitted shall be carried out in accordance with the submitted flood risk assessment (Ref 01/04/2022 Version 1.0 RAB: 2895FRD by RAB Consultants Limited and the mitigation measures it details.

Reason: To reduce the risk of flooding to the proposed development and future occupants. These mitigation measures shall be fully implemented prior to occupation. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

## 11 Storage of spoil during construction (sites partially within floodplain)

There shall be no spoil or building materials deposited or stored within the area of the site liable to flood, before or during the construction of the development hereby permitted.

Reason: To prevent the increased risk of flooding due to impedance of flood flows and reduction of flood storage capacity during the construction process and to comply with Policy EE13 of the Runnymede 2030 Local Plan and guidance within the NPPF.

## 12 Electric vehicle charging

The development hereby approved shall not be occupied unless and until at least 20% of the available parking spaces are provided with a fast charge socket (current minimum requirement: 7kw Mode 3 with Type 2 connector - 230 v AC 32 amp single phase dedicated supply) in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure sustainable design and to comply with policy SD7 of the Runnymede 2030 Local Plan and the NPPF.

13 Closure of existing access

The development hereby approved shall not be first occupied unless and until the existing accesses from the site to Ford Road have been permanently closed and any kerbs, verge, footway, fully reinstated.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policy SD4 of the Runnymede 2030 Local Plan and guidance within the NPPF.

14 Cycle Parking

The development hereby approved shall not be first occupied unless and until the following facilities have been provided in accordance with the approved plans for:

(a) The secure parking of bicycles within the development site, and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To ensure sustainable design and to comply with policy SD7 of the Runnymede 2030 Local Plan and the NPPF.

15 Parking

The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles and cycles to be parked and for the loading and unloading of vehicles and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking, loading & unloading and turning areas shall be retained and maintained for their designated purposes.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policy SD4 of the Runnymede 2030 Local Plan and guidance within the NPPF.

16 Construction Management Plan

No development shall commence until a Construction Transport Management Plan, to include details of:

- (a) parking for vehicles of site personnel, operatives and visitors
- (b) loading and unloading of plant and materials
- (c) storage of plant and materials

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to comply with Policy SD4 of the Runnymede 2030 Local Plan and guidance within the NPPF.

17 Ecology

The construction of the development hereby approved in detail shall take place fully in compliance with the measures set out in the Extended Phase 1 Ecological Habitat Survey Report (Hone Ecology, 2022), The Bat Emergence Survey Report (Sylvatica Ecology Ltd, July 2022) and LEMP (DPA June 2022) and the final development shall include the mitigation and enhancement measures as recommended in the Extended Phase 1 Ecological Habitat Survey Report (Hone Ecology, 2022), The Bat Emergence Survey Report (Sylvatica Ecology Ltd, July 2022) and LEMP (DPA June 2022) including the provision of bird and bat boxes. Such measures and enhancements as provided shall be retained and maintained thereafter.

Reason: To protect the habitat of bats, any invertebrates, badgers, the flora, fauna and ecological value on the site and to comply with Policies EE1, EE9 and EE11 of the Runnymede 2030 Local Plan and guidance within the NPPF.

18 Sensitive Lighting Scheme

Before any external lighting is installed at the site, details shall be submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details and be retained as such thereafter.

Reason: To protect the amenities of occupiers of nearby properties and to protect wildlife and to comply with Policies EE2 and EE9 of the Runnymede 2030 Local Plan and guidance within the NPPF.

19 Renewable Energy

Prior to the first occupation of the development hereby approved in detail, details of the chosen renewable energy/low carbon technology to be used, along with calculations demonstrating that a minimum of 10% of the predicted energy consumption would be met through renewable energy/low carbon technologies shall be submitted to and approved in writing by the Local Planning Authority (LPA). Development shall be carried out in accordance with the approved details and thereafter retained, maintained and operational unless otherwise agreed in writing by the LPA.

In the event of air or ground source heat pumps being the chosen renewable energy measure, details shall be submitted to and approved in writing by the LPA prior to installation. Details shall include acoustic data to demonstrate that there will be no increase in the background noise level and that there will be no tonal noise emitted from the unit, as well as details of the location of the unit(s) and the distance to the closest dwelling.

In the event of PV's panels being part of the chosen renewable energy measure, details shall be submitted to and approved in writing by the LPA prior to installation.

Reason: To ensure that a minimum of 10% of the energy requirement of the development is produced by on-site renewable energy sources/low carbon technology and to protect the amenities of occupiers of nearby properties and to comply with Policy SD8 of the Runnymede 2030 Local Plan and guidance within the NPPF.

20 Water Efficiency

Prior to the first occupation of the development hereby permitted it shall be demonstrated that the optional requirement for water consumption (110 litres use per person per day) in Regulation 36(2)(b) of the Building Regulations has been complied with for that dwelling. Such details as shall be approved shall be fully implemented and retained for the lifetime of the development.

Reason: In order to achieve water efficiency and sustainable development and to comply with Policy SD7 of the Runnymede 2030 Local Plan and guidance within the NPPF.

21 Details of Gates and fencing

No above ground development shall take place until details of all external boundary gates, fencing and any other means of enclosure have been submitted to and approved in writing by the Local Planning Authority (LPA); Development shall be carried out in accordance with the approved details and be retained as such thereafter.

Reason: In the interests of amenities and privacy and to comply with Policy EE1 of the Runnymede 2030 Local Plan and guidance within the NPPF.

## **Informatives:**

### **1 Summary of Reasons to Grant Consent**

The decision has been taken in compliance with the requirement in the NPPF to foster the delivery of sustainable development in a positive and proactive manner.

### **2 Waste Comments:**

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

### **3 Water Comments:**

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements> ) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

### **4 New Vehicle Crossovers and Dropped Kerbs**

The permission hereby granted shall not be construed as authority to carry out any works on the highway. The applicant is advised that prior approval must be obtained from the Highway



Authority before any works are carried out on any footway, footpath, carriageway, or verge to form a vehicle crossover or to install dropped kerbs. Please see [www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehicle-crossovers-or-dropped-kerbs](http://www.surreycc.gov.uk/roads-and-transport/road-permits-and-licences/vehicle-crossovers-or-dropped-kerbs) .

5 Other Works to the Highway

In the event that the access works require the felling of a highway tree not being subject to a Tree Preservation Order, and its removal has been permitted through planning permission, or as permitted development, the developer will pay to the County Council as part of its licence application fee compensation for its loss based upon 20% of the tree's CAVAT valuation to compensate for the loss of highway amenity

6 Closure of existing access

When a temporary access is approved or an access is to be closed as a condition of planning permission an agreement with, or licence issued by, the Highway Authority Local Highways Service will require that the redundant dropped kerb be raised and any verge or footway crossing be reinstated to conform with the existing adjoining surfaces at the developers expense.

7 Mud/debris on the highway

The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149)

8 Accommodation works

The developer is advised that as part of the detailed design of the highway works required by the above condition(s), the County Highway Authority may require necessary accommodation works to streetlights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

9 Electric vehicle charging

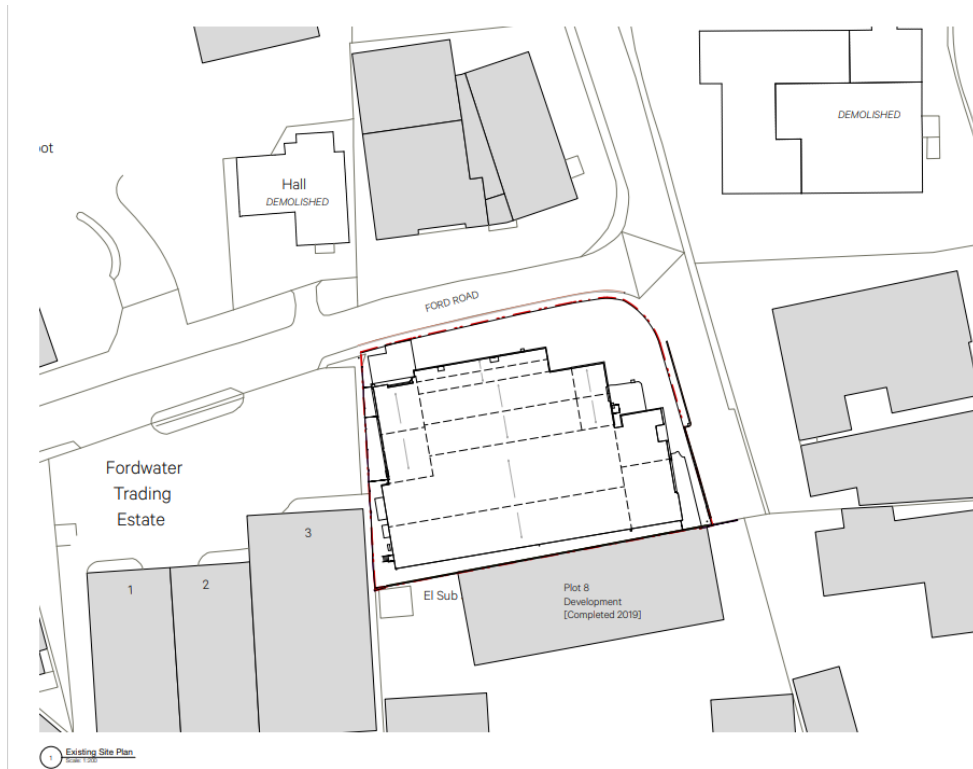
It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Please refer to:

<http://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html> for guidance and further information on charging modes and connector types.

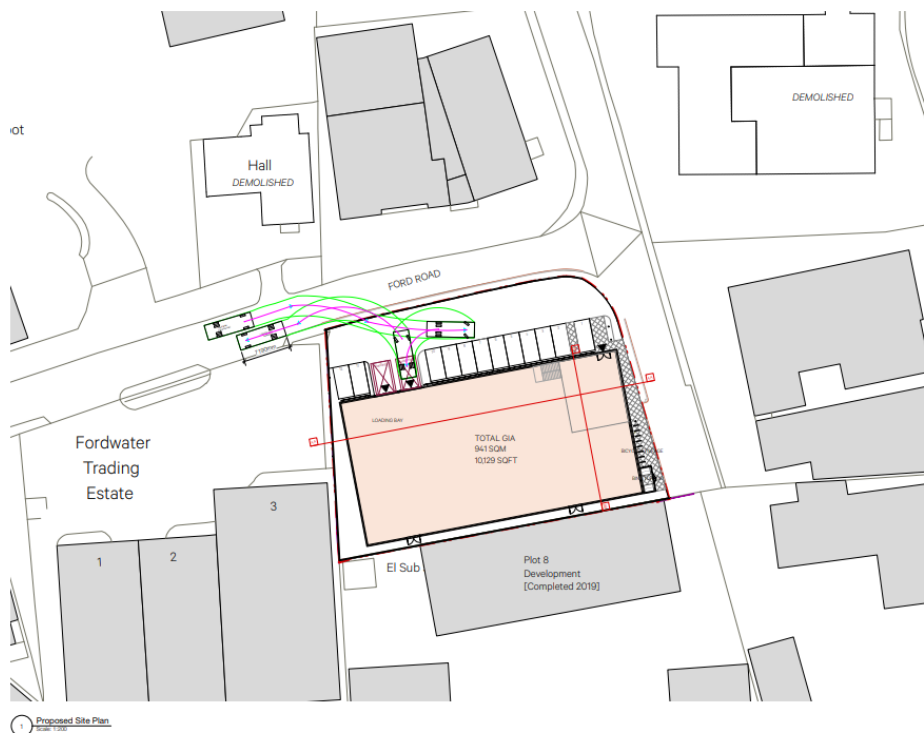
10 The applicant is advised that under the Control of Pollution Act 1974, construction work which will be audible at the site boundary will be restricted to the following hours: -

8.00am - 6.00pm      Monday to Friday  
8.00am - 1.00pm      Saturday  
and not at all on Sundays and Bank Holidays.

## Existing Site Plan



## Proposed Site Plan



## Existing Elevations

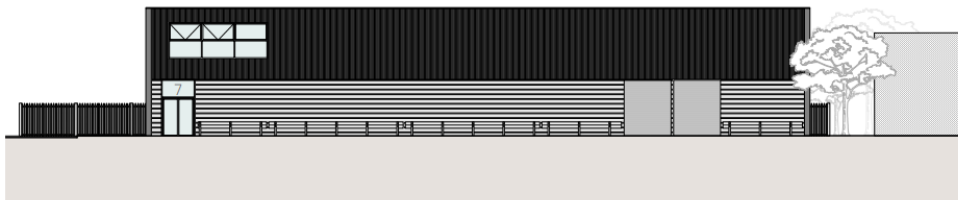


1 Existing North Elevation  
Scale: 1:100



2 Existing East Elevation  
Scale: 1:100

## Proposed Elevations



1 Proposed North Elevation  
Scale: 1:100



2 Proposed East Elevation  
Scale: 1:100

**Caxton Avenue Conservation Area Proposal (Planning Policy and Economic Development Services, Mike Corbett)**

**Synopsis of report:**

The Planning Policy Team was contacted by a local resident asking that several buildings in parts of Caxton Avenue and Coombelands Lane, Addlestone be considered for the Locally Listed Buildings designation, due to their historic links to the Caxton printworks, which used to be located nearby. This proposal was independently assessed by both Surrey County Council and Runnymede Borough Council's Heritage and Conservation Officers, who agreed that the area in which the buildings are located could potentially be designated as a Conservation Area instead.

Following this, the Planning Policy team discussed this recommendation with Members at the meeting of the Council's Infrastructure and Economic Development Working Party on 20<sup>th</sup> October 2021.

The Working Party agreed that officers should carry out further work to produce a draft Conservation Area Appraisal (CAA). This has been developed (see Appendix A) in conjunction with the help of two local residents.

**Recommendation(s): The Planning Committee is recommended to RESOLVE to:**

1. i) **APPROVE** the draft Caxton Avenue Conservation Area Appraisal for public consultation for a period of four weeks, commencing on 18<sup>th</sup> November 2022.

**1. Context and background of report**

- 1.1 In August 2020, a nomination form seeking to have a number of properties along Caxton Avenue and Coombelands Lane designated as Locally Listed Buildings was submitted by a local resident. Following on from a site visit, the Council's Heritage and Conservation Officer (HCO) (in September 2020) reported that the windows of the buildings in question, which are predominantly side opening casements, are in 'cottage style' but have largely been replaced in plastic with false glazing bars hidden in the double-glazing cavity. The HCO took the view that this has the unfortunate effect of showing large panes of glass without the breakup which genuine glazing bars provide. Due to the removal of so much original fabric in the windows, the advice was that the group of buildings was not suitable for Local Listing.
- 1.2 Although the HCO was of the view that the buildings were not suitable for Local Listing, he commented that he was 'quite stunned' at the general layout and quality of the designs, private road system and arcadian tree and shrub cover. He was of the opinion that the grouping had the appearance of a small Garden Village, with all the character of the Garden Village Movement in a loose Arts and Crafts style. The HCO

was of the view that the grouping could merit designation as a Conservation Area and therefore recommended that further specialist advice was sought in this regard.

- 1.3 As such, officers approached Surrey County Council's (SCC) Historic Environment Planning Team for a second opinion, and in July 2021, a joint site visit was undertaken with the SCC Historic Buildings Officer and a member of the Council's Planning Policy Team. The written feedback received from SCC was that the area was worthy of being designated as a Conservation Area.

## **2. Report**

- 2.1 The Council has engaged the expertise of its own in-house and external heritage specialists who have undertaken an assessment of the area. As both specialists have recommended that the area is worthy of Conservation Area status, the Planning Policy Team is seeking to take the next steps required to allow a formal designation to be made.

- 2.2 Under section 69(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 it states that:

Every local planning authority—

(a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and

(b) shall designate those areas as conservation areas.

- 2.3 In addition to this legislative requirement, paragraph 191 of the NPPF states that local authorities should ensure when designating a Conservation Area that the concept of conservation is not devalued through the designation of areas that lack special interest.

- 2.4 As part of the process of designating a Conservation Area, both the Secretary of State and Historic England will need to be notified under s.70(5) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990. Under s.70(8) of the Act, a notice also needs to be published in the London Gazette and one newspaper circulating in Runnymede. The legislation does not specify a set length of time for the notices to be advertised, or that the owners / occupiers of the properties in the proposed area would need to be consulted. However, officers are recommending that, subject to the approval of the Planning Committee, the Council should undertake consultation with the residents within the area recommended for designation (26 households in total), as well as all individuals and groups registered on the Council's Planning Policy database as this is considered to be best practice and a way to both publicise and gain feedback on the proposal.

- 2.5 SCC advised that to support the potential designation of the area shown in Appendix B as a Conservation Area, a Conservation Area Appraisal (CAA) should be produced. Their advice was that the CAA should:

- Identify why the area is significant;
- Provide both the local and national context to the development along Caxton Avenue and Coombelands Lane, including its history; and
- Possibly include details of the original design of the houses if this can be found through research.

- 2.6 The draft CAA at Appendix A has been designed to cover the above listed points and alongside the narrative in the Assessment, contains photographs of the area, and copies of original historic documents, which help set out why the area has special architectural and historic interest. A covering letter setting out the details of the consultation and potential impacts of having their properties covered by a Conservation Area designation is proposed to be sent to all properties within the area shown in Appendix B, along with details of where the Conservation Area Appraisal can be viewed on the Council's website at the outset of the consultation. Officers will consider the feedback received before bringing a further report back to Planning Committee with advice on whether it remains the officer recommendation that a formal designation should be made.
- 2.7 If it is decided that a new Conservation Area should be designated to cover the area shown in Appendix B, subsequent to the designation taking effect, should proposals to preserve and enhance it (such as through the production of a management plan) be put forward, this will need to be discussed as part of a public meeting under s.71(2) of the Act. Currently there are no plans for developing a specific management plan for the area.

### **3. Policy framework implications**

- 3.1 Should a formal Conservation Area designation be made, the Council's Policies Map for the Local Plan would need to be amended accordingly to reflect this. Such a designation would be particularly relevant for the planning department (e.g., in relation to which policies would be applicable in the determination of planning applications in the area). It would also be relevant for Local Land Charges and property search requests, as the Conservation Area designation means that some extra planning controls and considerations would exist within the specified area. Whilst this is necessary to protect the historic and architectural elements which make the place special, they have the potential to affect owners who want to work on the outside of their building or any trees on their property.

### **4. Resource implications/Value for Money**

- 4.1 No additional resource has been required within the Planning Policy team to progress this project, and none is envisaged to be required in the future to complete the project. Costs are limited to the printing of a small number of letters and several copies of the Conservation Area Appraisal itself and advertising the proposal in the press. All of these activities would be covered by the existing Planning Policy budget for the 2022/23 financial year.

### **5. Legal implications**

- 5.1 There is the potential for the designation of a Conservation Area to be challenged through the courts. However, Officers will ensure that they comply with the legislative requirements for the designation process as set out in the relevant legislation to minimise this risk.

### **6. Equality implications**

- 6.1 The Council has a Public Sector Duty under the Equalities Act 2020 to have due regard to the need to:

- Eliminate unlawful discrimination, harassment or victimisation;
- Advance equality of opportunity between persons who share a Protected Characteristic and persons who do not share it;
- Foster good relations between those who share a relevant characteristic and persons who do not share those characteristics.

in relation to the 9 'Protected Characteristics' stated within the Act.

- 6.2 An EqIA screening has been carried out by officers which can be viewed at Appendix C. This EqIA screening has picked up potential negative impacts on those with the protected characteristics of age and disability, however, it is not considered that a full EqIA is required as the Government requires Local Authorities to designate Conservation Areas through primary legislation where they have been identified to have special architectural or historic interest, and the Council is following this process. Also, personal circumstances can be weighed in the planning balance when determining planning applications.

## **7. Environmental/Sustainability/Biodiversity implications**

- 7.1 A Conservation Area designation, if made, would help to preserve and enhance the Borough's heritage assets in line with objective 8 of the adopted Runnymede 2030 Local Plan.

## **8. Timetable for Implementation**

- 8.1 The next steps towards the designation and implementation of the proposed Conservation Area at Caxton Avenue and Coombelands Lane would be a public consultation including residents within the proposed area of designation. Subsequently, officers would then consider all feedback received.
- 8.2 The responses to the consultation, together with any amendments made to the CAA in light of the comments received would then be presented to the Planning Committee along with a report recommending whether it is considered that a Conservation Area designation remains appropriate.
- 8.3 There is no set timetable to progress this work, however, the Planning Committee will be kept apprised of progress.

## **9. Conclusions**

- 9.1 The area shown in Appendix B is considered to have special architectural and historic interest which warrants the area being designated as a Conservation Area. Officers recommend that the public is now consulted on this proposal.

(To resolve)

### **Background papers**

Appendix A: copy of the draft Caxton Avenue Conservation Area Appraisal  
 Appendix B: map of the proposed Conservation Area  
 Appendix C: Equalities screening assessment

# Caxton Avenue Conservation Area Appraisal

October 2022

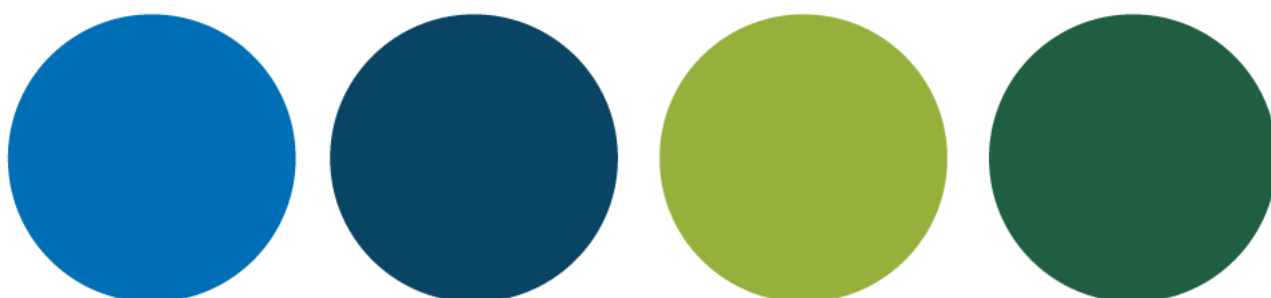






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## Introduction

### **Caxton Avenue Conservation Area growth is shown by the Ordnance Survey Mapping of the area from 1869 through to 1968.**

Caxton Avenue and a section of Coombelands Lane contain 26 properties which represent the first phase of a Garden Village which was planned as a much larger development but was never completed.

It was built on land associated with Coombelands House and Coombelands Farm, with the Ordnance Survey mapping that surveyed the area in 1869 and published in 1914 showing the estate in the open

countryside, with the site where the printing works would be located being occupied by a walled garden at that time.

The 1934 revision shows the 26 dwellings in place, but with some sporadic development surrounding it, with the map from 1968 showing that building development had become far more comprehensive in the area a further 34 years later. These maps can be seen on pages 6-7 of this document.

## History

### **The history of the development and printing in the area.**

Initially in Addlestone there has been a proposal for a Garden Village by Norbert Chereau, who proposed a 250-home scheme in the Surrey Advertiser, dated 14 April 1919, however, this never came to fruition. The development of these homes was a result of Percival E Jones, a printer with three print works in Birmingham and one in London who wanted to amalgamate these works into one large factory, so began to look for suitable sites to build a new works together with enough land to build his vision of a model village for the print workers.

His purchase of the Coombelands estate was completed in 1921. The estate was divided between two new companies: The Pressat Coombelands Ltd incorporated in 1921 operating the printing side of the business and Coombelands Estates Ltd, providing housing and amenities for the employees and their families. On purchase the new owners set about building a new

41,000sqft (circa 3,800sqm) print works on the site of the former walled garden.

The print works started production in 1928. A detached building in a similar style housed a social club with a full-sized billiard room. Also constructed in 1926, part funded by subsidy under the Housing Act 1923, to be occupied by print workers, were several semi-detached cottages down Coombelands Lane, then along a new road, Caxton Avenue, together with detached bungalows in Caxton Avenue and Farm Lane. In all 22 cottages and nine bungalows were built. The dwellings were in rustic style, whitewashed, with several having black stained weatherboarding at the first floor level. They had generous gardens and were built at a low density. Trees and shrubs were planted along the roads in borders that were maintained by company employed gardeners.

Coombelands House, the Lodge and Farm of 180 acres were all retained. Coombelands

House served as a hostel for single workers until the new housing was built. Along with the Social Club there were other facilities provided for the company employees including a large sports field with a pavilion and a tennis court.

World War II changed many things for the area. Coombelands House and the Press were taken over on requisition by Vickers Armstrong, the aircraft makers, based at nearby Brooklands. Only a small section of the factory remained devoted to printing, mainly producing military manuals.

Coombelands Farm was also taken over by the Ministry of Agriculture Fisheries and Food in 1941 to expand the nearby Veterinary Research Laboratory.

After WWII Coombeland Estates sold 34 acres off to Ralph Vines in October 1951. It consisted of farmland, a tree nursery and mineral workings. Vines then constructed a farmhouse called Park Farm in 1952. An area of outlying land, the sports ground was retained by the estate.

WWII also meant the company lost control over the workers housing. It was difficult to obtain labour unless accommodation was offered so the company set up a Housing Association in 1955 taking advantage of government subsidies to build new dwellings. Chaucer Way was laid out in 1956 and 30 new semi-detached houses were built.

Coombelands House was demolished by 1961 as the building by that time was in poor condition. This allowed for further houses (numbers 31 to 40 Chaucer Way and maisonettes on Hartland Road) to be built in 1967.

The story of printing at Coombelands after WWII was of improvement in fortunes followed by gentle decline. The Press was eventually taken over by Benn Brothers, a London printing company, in 1957 and the Jones family were no longer involved. There followed a change with the community ethos becoming less important, and the

Estate company became more focused on property development. In the early 1960's Calor Gas moved onto the eastern part of the site occupying a large laboratory. This subsequently became Coombelands Business Park with several small industries occupying various units.

In June 1978 the works were purchased by the well-known local company of Ian Allan when the existing business was under financial pressure. Also, in 1978, a small cul-de-sac of houses, numbers 41-49 Chaucer Way was developed, and new dwellings constructed at Hartland Road. The social club was converted to offices in 1981. In the 1970's and 1980's the amenity land on the estate was gradually sold off for infill housing including the former tennis court on Coombelands Lane in 1977 together with various plots in Chaucer Way. In 1984, two blocks of flats were built named Wriotsley Way.

By 1982 a property company, Mountview Estates, had acquired the property holdings in Chaucer Way and Caxton Avenue consisting of roadways with associated amenity land and a substantial number of rent controlled properties housing current and former employees of the print works. When the regulated tenancies of the former company employees came to an end the houses were then sold off. Eventually, with very few tenancies left, Mountview sold the roads to residents' groups on Chaucer Way in 2000 and Caxton Avenue in 2001, the latter being to Caxton Avenue 2001 Ltd which remains the owning company of the road and verges.

In 1995 Ian Allen moved out of the print works and the tenants of the business park gradually vacated. There followed a lengthy period of plans being submitted to Runnymede Borough Council before permission was granted in 1998 for demolition and erection of a new housing estate of 50 homes called Redwoods. Thus ended 65 years of printing at Coombelands.

Although the printing and property company no longer manage the homes, it should be noted that there are a number of restrictive covenants upon the properties that are still in force at the time of the publishing of this Appraisal.

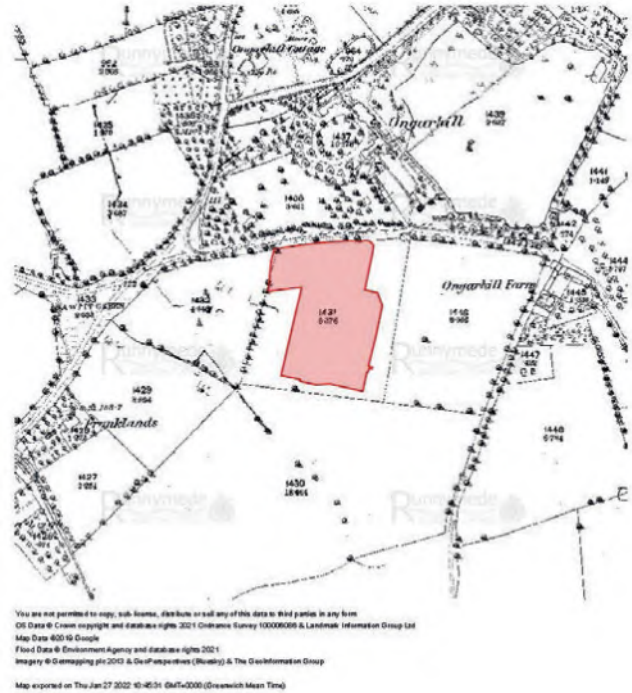
There is evidence of these from a lease agreement relating to 20 Caxton Avenue dated 1st May 1953, and subsequently a covenant from 1969 (for the same property) that states that the occupier is:

- ▶ Not to use or permit to be used any buildings or erection now or to be erected on the land hereby transferred or any part thereof for the purpose of any trade or business or for any purpose except that of a private dwelling house or that of a surgery for a doctor or dentist.
- ▶ Not to cause or permit any nuisance on the land here by transferred or any part thereof and not to do or permit thereon any act or thing which causes or may grow to cause any damage, inconvenience, annoyance, or disturbance to the owners or occupiers of adjacent or neighbouring property.
- ▶ Not to permit washing to be hung out on any part of the land hereby transferred on a Sunday.
- ▶ Not to allow the parking of caravans on the land hereby transferred or the erection of any temporary buildings thereon except with the written consent of the Transferors or their agent or agents.
- ▶ To forever maintain in good repair and proper order good and substantial boundary fences and hedges on the Eastern, Southern and Western boundaries of the land hereby transferred.

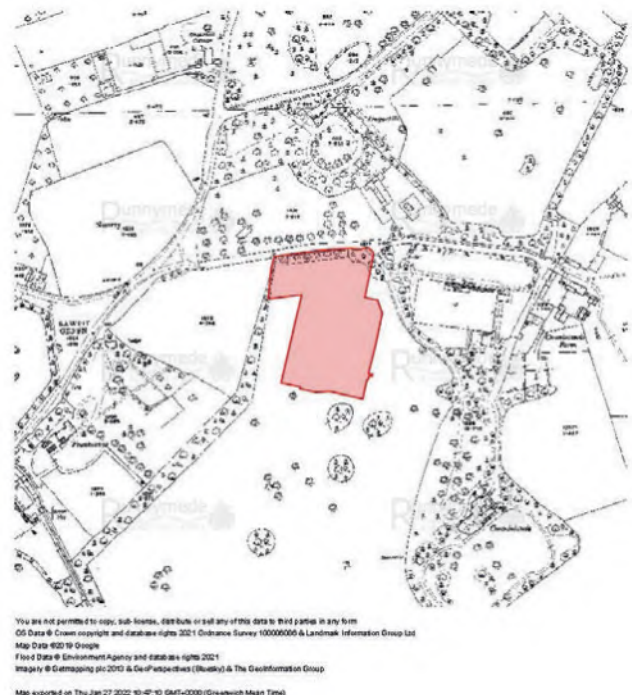
As can be seen from the above, there has been a long-standing desire to retain the character of the area as primarily residential, and the photographs taken as part of the assessment of the area show the houses have largely retained their character and

style over a long period of time. The key features and influences on the design of the houses are discussed in more detail in the following section.

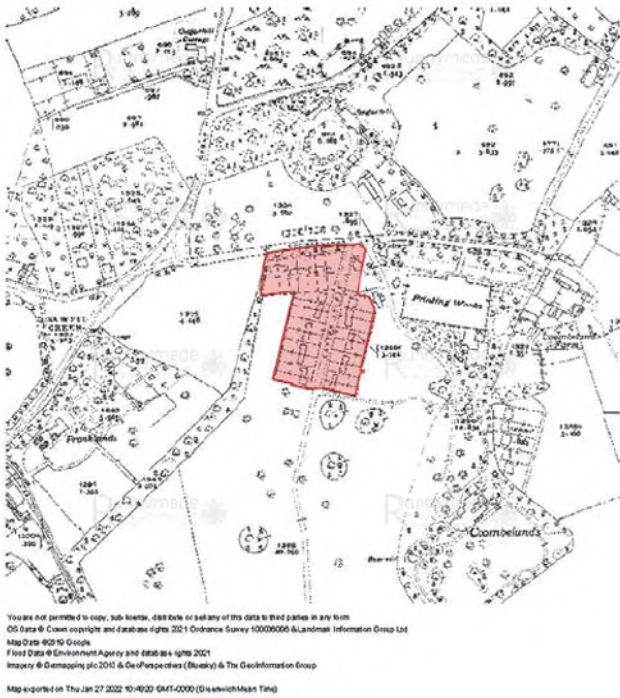
#### Caxton Avenue Conservation Area as shown on the 1869-1894 OS map.



#### Caxton Avenue Conservation Area as shown on the 1914-1915 OS map.



**Caxton Avenue Conservation Area as shown on the 1934- 1937 OS map.**



**Caxton Avenue 1914 OS map.  
 Courtesy of Surrey County Council.**



**Caxton Avenue 1934 OS map.  
 Courtesy of Surrey County Council.**



**Caxton Avenue 1968 OS map.  
 Courtesy of Surrey County Council.**



# Influences

## Influences on the design of the area. The Garden City / Village movement.

The Garden City movement, like its smaller Garden Village counterpart was initiated in the UK by the planner Sir Ebenezer Howard. They were a planning concept which encouraged self-contained communities, often on the fringes of towns, in what at the time was open countryside. It was intended that local industry or agriculture would provide convenient and nearby employment. The concept stretches from the post-Industrial Revolution period (starting circa 1820-1840) to the 1920's.

These Garden settlements were planned to be distinct, self-contained, entities with shops, transport links, schools and green open spaces. Alternatively, some garden villages were sited outside cities and towns but easily served by rail or road transport. The aim of such planned villages was to combine the benefits of town life and local employment, with rural idyll, and providing better living environments to often squalid, cramped urban living.

Most Garden Villages were designed to provide rented accommodation and often, wealthy employers / manufacturers built these communities for their workforce. Many places which may be termed the original Garden Villages still thrive today with well-known examples of larger schemes including Port Sunlight, Bourneville, Letchworth and Welwyn Garden City. The layouts were spacious with large private gardens, wide roads and grass verges with forest scale tree planting giving a rural arcadian feel.

### The Arts and Crafts movement

Most of the house designs (both built and set out in Plans and Drawings chapter) were loosely based on the materials and proportions made popular by the Arts and Crafts Movement, which took place between

(broadly) 1860-1925. This movement, which was a result of the grim industrialisation of the 19th century, led designers to seek to produce new and more beautiful environments in which people might live and delight in fine craftsmanship, using intrinsically attractive building materials.

The English critic John Ruskin (1819-1920), directed attention to the qualities of medieval architecture, holding up as models the members of the crafts guilds and the builders of larger houses. A whole generation of artists and designers were influenced by Ruskin, among them, William Morris (1834-96), who is most closely associated with the Arts and Crafts movement, took to heart Ruskin's pleas for honesty of materials and craftsmanship.

The RED House built for Morris in Bexley Heath by architect Philip Webb is the starting point of the new style. Webb turned from High Victorian Gothic style to a simpler vernacular architecture based on old English cottages and farmhouses. Most of his commissions, together with those of his contemporary Norman Shaw, were for individual private residences where the use of tile-hung facade, stained timber boarding on first floor facade, very dominant and



Example of stained timber facade.

steeply pitched roofs, hipped and swept-hipped roofs on semi-detached properties, overhanging eaves, bands of brickwork and porches were much in evidence. As this simple rustic style became fashionable among the middle classes, so the concept filtered down to architects whose work involved estate developments and to Garden City / Garden Village developers, but in a much more simple and economic form.

At Caxton Avenue the semi-detached blocks have steep and very prominent roofs with hips at each end, except for some which have a gable on one half of the semi.



Example of a Hip roof.

This is a much-used Arts and Crafts device which gives the impression that the pair is in fact one large property. Some hipped

roofs use a swept hip which extends down to mid floor level. Again, this increases the dominance of the roof element.

Tile hanging or stained timber boarding to the upper floors accentuates the perceived dominance of the roofs. Substantial central chimneys complete the cottage or farmhouse style of the buildings.

Most facades are now painted white, but it is likely that facing brickwork would have been the original finish, however, the texture of the bricks beneath the painting is still a prominent feature. The windows are set in groups of three casements and no sliding sash windows are used which reinforces the 'cottage' style of the windows.

The ground floor windows have capped relieving arches which add detail and interest. Most of the side opening casement windows at Caxton Avenue have been replaced by double glazed units but the general proportions and sub-divisions of the originals have fortunately been maintained.

The access road is wide with grass verges planted with forest scale trees while the front property boundaries are formed of hedges. All this leads to the feel of rural living with the houses set well back amongst vegetation, again an Arts and Crafts concept.

## Plans

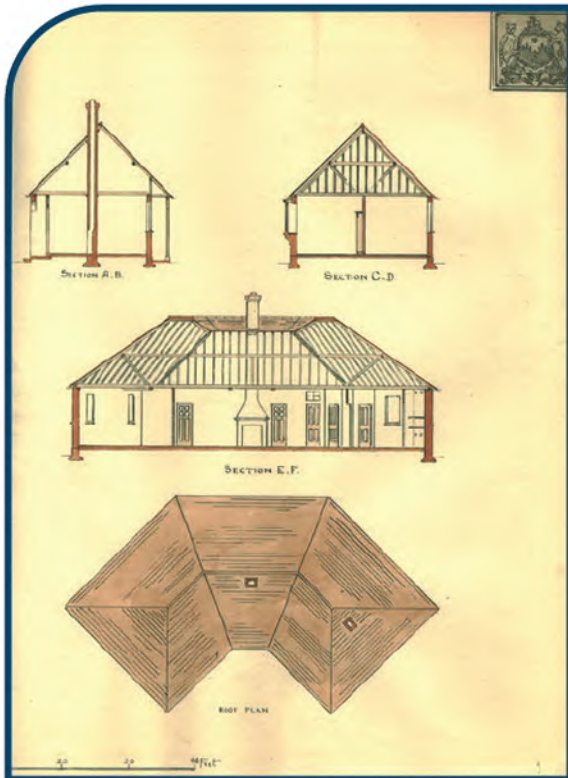
**This chapter looks at a series of architect drawings and plans for the Garden Village and surrounding development that did not materialise.**

The images show the plans and drawings for a series of different house types which were planned to be developed as part of the envisioned (and much larger) Garden Village which was intended to be built around

the printworks. As this did not materialise, not all these types are present in the extant dwellings in Caxton Avenue and Coombelands Lane.

**The series of images on page 10 were kindly provided by Chertsey Museum.**





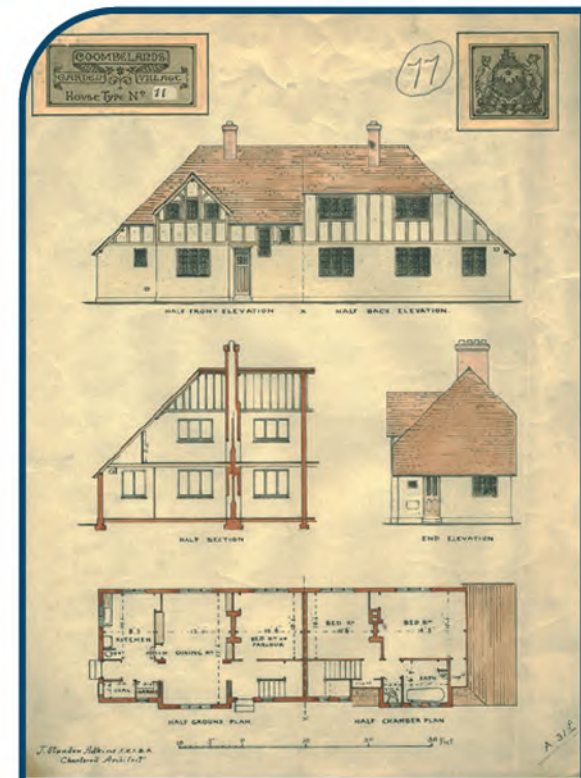
House type 1



House type 5



House type 6



House type 11

# Specification

The following pages show a copy of the original specification of works for the homes built in the area. This sets out standards for various parts of the dwellings, such as the foundations, drains, paths, walls, floors, roofs, stairs etc.

The build quality, as well as the use of the relatively new cavity wall feature highlight that the properties along Caxton Avenue and Coombelands Lane are examples of high-quality and well-designed homes that were built to be directly linked to employment at the printworks. This quality has been

maintained over the decades, and the Conservation Area encapsulates a discrete area of housing that was the first part of what would have most likely been a much larger Garden Village Development, if the wider area had also been developed as part of a 'proper' Garden Village.

## Specification of work plans

Below are images of the original specification of works supplied by Chertsey Museum, which set out how the homes were to be constructed.

This includes reference to the relatively novel feature of cavity walls.

### Specification of Works

to be done and materials to be used in the erection of houses on the Coombelands Estate according to the drawings for houses type No. \_\_\_\_\_ furnished herewith by J. Standen Adkins, F.R.I.B.A., Chartered Architect.

- Excavation.** 1. Remove all vegetable mould from the surface to be covered by the building and deposit where directed. Excavate the ground to the depth and width necessary to receive the foundations as shown on the drawings or deeper if necessary to obtain a solid bottom. Give notice to the architect when the trenches are ready and allow no concrete to be laid until they have been inspected and approved. A portion of the excavated soil to be filled in and rammed on each side against the walls as the work is carried up.
- Concrete.** 2. Compose concrete of five parts gravel, ballast or crushed bricks to pass 1/2 in. mesh, two parts clean sharp sand and one part Portland cement thoroughly mixed while dry on clean boarded platform and mix again after the addition of water. The concrete to be put in neither too moist or too dry, but so that after repeated ramming the moisture just flushes up to the surface.
- Reinforce.** 3. Reinforce concrete wherever necessary in foundations or other parts of the structure with bars of the necessary size of the Patent Indented Steel Bar Co. or other approved System all properly spaced and tied as necessary with strong galvanized wire.
- Foundation** 4. Form strip footings 1ft.6in. wide at base with bevelled sides reducing at ground level to width of plinth. Form plinth to level of damp-proof course.
- D.P.C.** 5. Lay D.P.C. of approved bitumen sheet in long lengths, carefully lap at least 3in. at all angles and junctions.
- Floors.** 6. Lay over the surface between external walls a bed of hard core well rammed and over this spread a bed of cement concrete 4in. thick. Finish floor of coals 8in. below general floor level.
- Drains.** 7. Cut trenches for drains as required with fall of 2in. in 10ft. and lay with glazed stoneware socketted drain pipes jointed in cement with all necessary approved stoneware trapped gulleys, bends and junctions and carry into main drains or sewers as directed. When drains have been inspected and approved fill in with earth rammed solid. Provide all necessary surface and land drains. All drainage to be carried out in strict accordance with the requirements of the Local Sanitary Authorities.
- Paths.** 8. Excavate for and form paths as shown or directed and form embankments or terraces where required. Lay paths with good bed of hard core and finish with gravel or Crazy paving.

Specification of works front page.

- Walls.** 9. For concrete walls use concrete as before described with reinforcement of bars or of strong galvanized net as described or required. For brick walls, chimney breasts, etc., use approved bricks, hard, square and well burnt, laid in old English bond where they exceed 4 1/2 in. in thickness in mortar compounded of one part ground flint lime, burnt from the beds of the lower lias formation, three parts clean sharp sand free from salt or other impurity, thoroughly mixed and tempered on clean boarded platform. Make up mortar in small quantities and use fresh.
- Mortar** Cement mortar to be used for chimney stacks and in such other situation as may be necessary. Compound it of one part heavy Portland cement finely ground and three parts clean sharp sand.
- Pointing.** Point all external surfaces of brickwork (except where intended to be stuccoed or rough cast) with a properly formed weathered struck joint finished as the work proceeds.
- Chimneys.** 10. Carefully form flues with easy bends and parget with cow dung mortar. Form copes with projecting courses as shown. Build in at top of each flue a length of glazed stoneware pipe projecting 9in. above brickwork and carefully flaunch in cement. Wherever chimneys pass through roof boarding and where any timbers pass within 3in. of outer surface of brickwork containing flues the surface of the brickwork is to be rendered 1/2 in. thick in cement carried at least 4in. beyond the timber on both sides.
- Thickness of Wall.** 11. External walls generally to be made with outer wall 4 1/2 in. thick 1 1/2 in. cavity and inner wall of 3in. breeze concrete blocks all properly secured with strong twisted galvanized iron ties of approved form.
- Stucco and Rough Cast.** 12. Where walls and chimney shafts are shown or described to be finished with trowelled stucco or rough cast all joints of brickwork are to be raked out clean and square to a depth of at least 1/2 in. to afford key.
- Air Spaces.** 13. An air space nowhere less than 1/2 in. wide is to be left around all timbers or ends of timbers which are built into walls.
- Beam Filling.** 14. Beam filling to be formed at the eaves of all roofs carefully fitted but allowing free circulation of air to plates and rafters.
- Partitions.** 15. Form partitions and internal walls where not otherwise shown with breeze concrete blocks. Where sliding doors occur the partitions are to be formed double with sufficient cavity for easy working and proper attachment for runners, etc.
- Half-timber.** 16. Where half timber treatment is shown form framing of clean well seasoned deal or pine free from shakes, loose knots or other defects and lathed clear of sap, fix to backing of strong asbestos sheet well nailed to framing and finish between framing with rough cast or trowelled stucco as shown. Securely fix outer framing to strong angle posts and studding and leave air cavity clear of internal partition.

Specification of works page 2.

<b>Finish inside.</b>	17. Finish the internal surface of walls generally with fibre or other approved facing boards carefully fitted and close nailed.
<b>Floors.</b>	18. Lay floors of ground storey with narrow boards of deal as before described in short lengths on the concrete bed in a layer of boiling Stockholm tar mixed with sufficient pitch to prevent cracking. Carefully clean off when set and traverse where necessary. Lay floors of chamber storey with lin. clean yellow deal battens well cramped and securely nailed to joists of the scantlings shown on detail drawings.
<b>Roofs.</b>	19. Frame the roofs throughout in accordance with the drawings with timbers as described in clause 16 and of the scantlings shown or figured on details and provide ceiling joists at the level shown.
<b>Stairs.</b>	20. Form staircases with lin. risers and 1 1/2 in. treads with chamfered nosings housed into 2 in. outer string board and 1 1/2 in. wall string and glued blocked and bracketed to strong carriage where required, put 3 1/2 in x 3 1/2 in. newel posts finished with cut finials or carried up to floor above as shown, 2 1/2 in. x 2 in. handrail and flat cut balusters made to detail. 21. All doors, window frames and internal fittings to be of approved form and quality.
<b>Preservative.</b>	22. All framing of half timber work, all barge boards or other ornamental features, all sills plates etc. bedded on walls and all ends of timbers carried into or in contact with walls are to be thoroughly treated and where possible soaked with Jolcite or other approved preservative.
<b>Roof Covering.</b>	23. Cover roofs generally with plain tiles of approved make and colour or with Coutra tiles hung on strong battens and secured with strong copper or composition nails not less than 1 1/2 in. long. Plain tiles to be hung to 3 1/2 in. gauge, Coutra tiles to be hung in accordance with their bond. Form hips and valleys with properly formed hips or valley tiles and at junctions with chimney shafts, walls or timbers form proper cement fillets or flashings of 16 oz. copper as shown or required. Where change of pitch occurs put apron piece of 16 oz. copper, or with 2 lb. lead. To bay windows and flats over verandahs put covering of 16 oz. copper laid in narrow sheets with rolls formed with welted joint on triangular fillets.
<b>Gutters and R.W.F.s.</b>	24. To eaves of main roofs fix 5 in. semi-eaves gutters and to minor roofs and flats fix 3 in. ditto with iron ejets all bedded in white lead and screwed and rest of wrought iron brackets about 3ft. 0in. apart fixed to feet on rafters or to fascia with good fall to outlets, coat inside of all gutters with good black varnish. Fix with plain bands cast on and with swannecks, bends and shoes as required cast iron rainwater pipes 3 in. diameter for main roofs and 2 in. for minor roofs, all to discharge over galvanized iron gratings in trapped gullies.
<b>Soil Pipes.</b>	25. Soil pipes to be of 8 lb. lead 3 in. diameter connected direct to drain and carried up well above eaves, and fix in top copper wire rose securely attached.

Specification of works page 3.

<b>Sanitary Fittings.</b>	26. Provide and fix W.C. apparatus, bath, lavatory basin, slop sinks and scullery sinks of approved pattern with all necessary taps, connections and wastes.
<b>Water Supply.</b>	27. Provide and fix on strong bearers galvanized iron cistern to hold 150 gallons with close fitting cover and 1 in. overflow pipe to discharge in open with flap guard. Lay on water by 1/2 in. pipe fitted with ball cock with copper ball. Provide and fix in hot closet a 50 gallon galvanized iron circulating cistern connected with boiler and lay on with 1/2 in. pipe to bath and 1/2 in. to other services.
<b>Grates.</b>	28. Provide and fix as directed all necessary grates, gas stoves, etc.
<b>Bin.</b>	29. Provide large sanitary dust bin of approved make.
<b>Gas.</b>	30. Lay on gas from main to all gas fires and cookers.
<b>Windows.</b>	31. Fix to all window openings standard pattern iron casements and frames with saddle bars, stay bars and fasteners, glaze with good 21 oz. sheet glass in small diamond or square panes in stout lead cames tied to saddle bars by strong copper wire ties securely soldered on. In frames make outer border of extra wide lead to reduce opening to same dimensions as for casements. All glass to be well cemented into lead cames and steeped in oil as long as possible before delivery. All glazing to be pointed to grooves or frames.
<b>Larder.</b>	32. Upper half of larder window to be fitted with strong perforated zinc. Insert in walls of larder No. 4 air bricks two near ceiling and two 9 in. above floor.
<b>Ceilings.</b>	33. Form ceilings throughout with approved fibrous plaster slabs securely nailed to joists and carefully fitted and jointed. Twice whiten all ceilings.
<b>Electric Light.</b>	34. Wire throughout for electric light on approved system and provide all necessary insulation, cut-outs, plugs, etc. and all attachments for fittings. 35. Fix in external wall of coals wrought iron hopper and frame, and fasten with staple and padlock.
<b>Painting and Staining.</b>	36. Paint all ironwork two coats good oil paint before fixing and all external ironwork two further coats after fixing. Size and stain all internal woodwork and twice varnish.
<b>Finish.</b>	37. Clean down all work, remove all debris and leave the whole in good and orderly condition at conclusion of work.

Specification of works page 4.

## Images of the Conservation Area

Below are a selection of images of the homes along Caxton Avenue and Coombelands Lane. All images are courtesy of Runnymede Borough Council.





Winter 2021 Coombelands Lane housing.



Spring 2022 Caxton Avenue housing.









Caxton Avenue, looking north from Chaucer Way



Coombelands Lane.







Porch detailing.



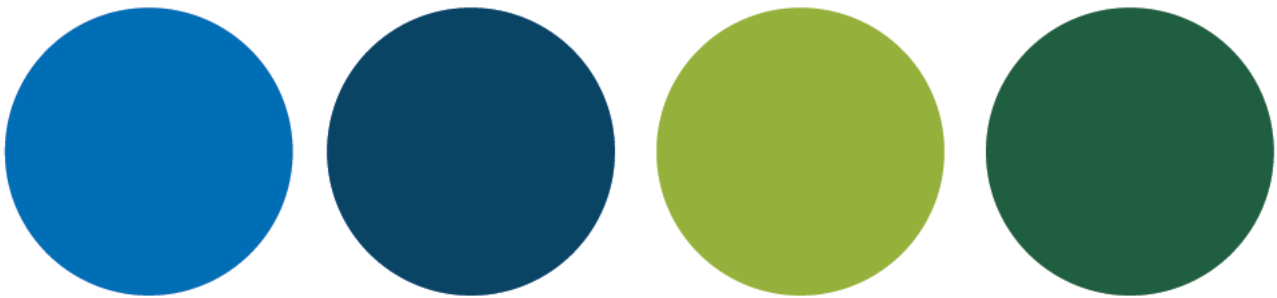
Modern UPVC casement windows.



## Key note

Although number 23 Caxton Avenue was severely damaged in January 2019 by fire and was subsequently granted planning permission to demolish the damaged structure in June 2021 under reference number RU.21/0487, this permission was granted prior to the designation of the Conservation Area and thus should not be

relied upon as a precedent for the design of buildings in the Conservation Area going forward. This is because the symmetrical designs of the houses either side of the road are a key part of the area's overall Garden Village design and allows the area to be understood holistically.

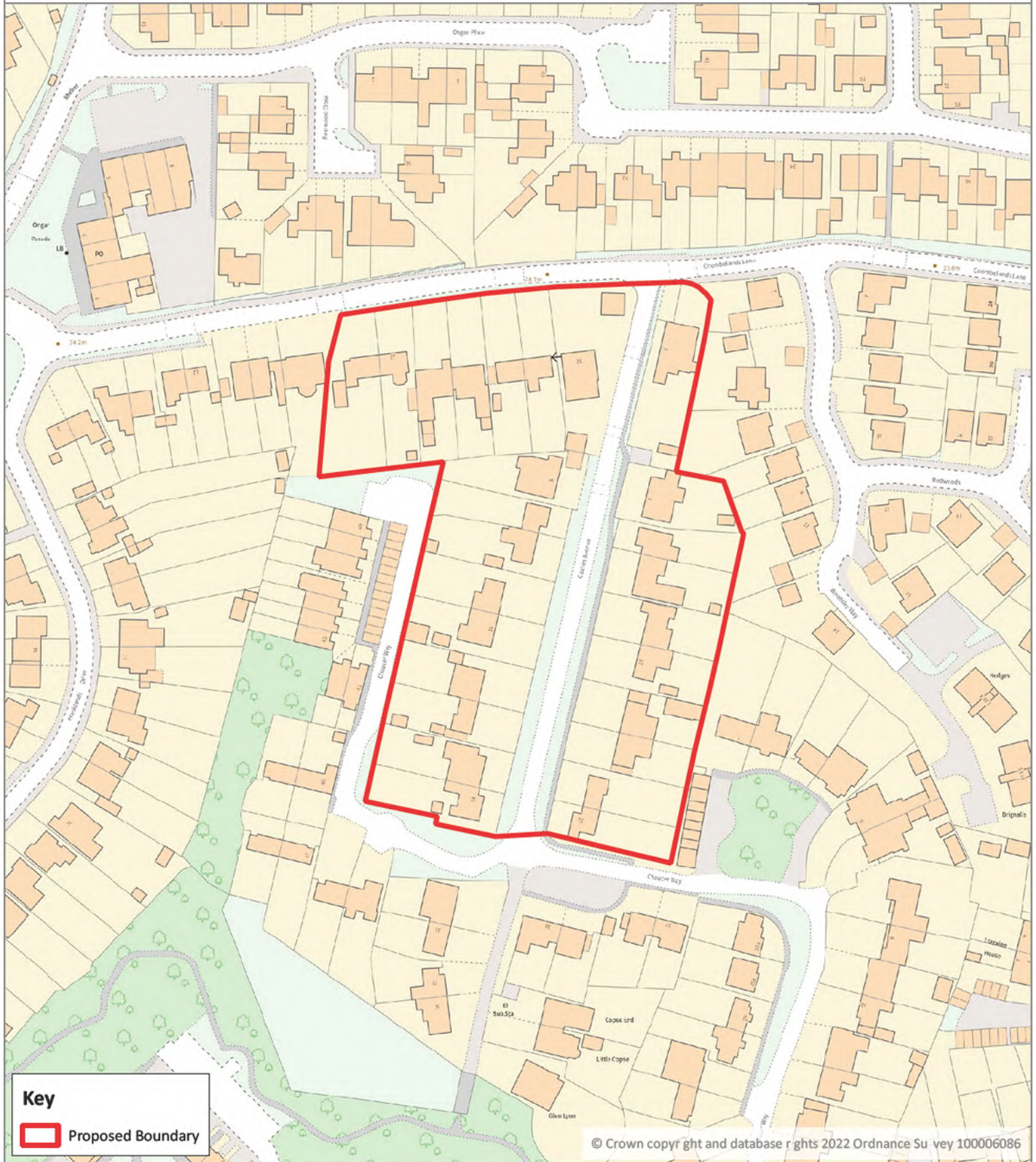




### Proposed Caxton Avenue Conservation Area Boundary

Runnymede Borough Council  
Runnymede C v c Centre  
Station Road  
Add estone  
Surrey KT15 2AH

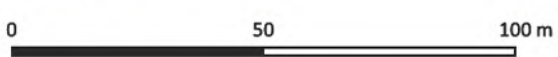
Date: 10/10/2022



**Key**  
[Red outline] Proposed Boundary

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Scale: 1:1,500



For all information contained within this document contact:

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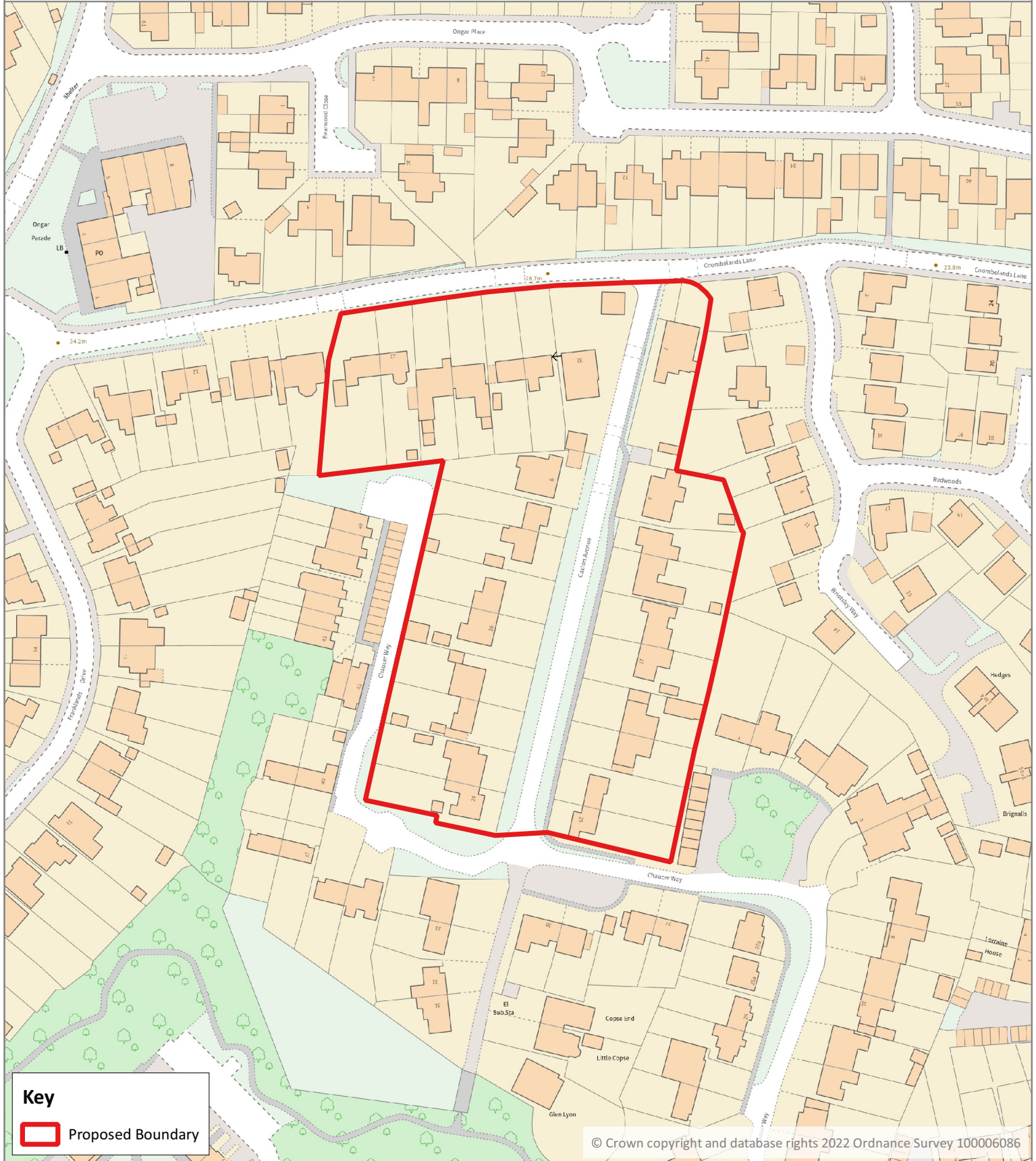
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Proposed Caxton Avenue Conservation Area Boundary

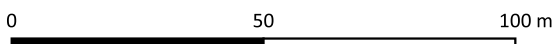
Runnymede Borough Council  
Runnymede Civic Centre  
Station Road  
Addlestone  
Surrey KT15 2AH

Date: 10/10/2022



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Scale: 1:1,500



## Appendix C

### EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Caxton Avenue Conservation Area	Michael Corbett (Senior Planning Policy Officer)

**A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?**

The aim of designating the Caxton Avenue Conservation Area (CA), which would cover properties on Caxton Avenue and a small number on Coombelands Lane in the Rowtown area of Addlestone, is to protect the special architectural and historic interest of the area. It will provide additional protections for the properties and their setting and require compliance with policies in the Council's adopted Runnymede 2030 Local Plan which relate to CA designations.

Under section 69(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 it states that:

Every local planning authority—

- (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and
- (b) shall designate those areas as conservation areas.

Therefore, the Council is required, from time to time, to review the Borough and designate (where appropriate) new CAs where this is merited. As the officers have consulted both Runnymede's and Surrey County Council's heritage specialists, who have agreed the proposed area meets the threshold to be designated as a CA, proceeding with the designation would be supported by primary legislation.

Runnymede Borough Council recognises that a quality-built environment is an essential element in creating distinctive, enjoyable and successful places in which to live. The CA designation would build upon principles set out in the Runnymede 2030 Local Plan (particularly Policy EE5: Conservation Areas) and, as such, is a fundamental part of the planning policy 'toolkit'.

The Draft Conservation Area Appraisal (CAA), which has been prepared for public consultation, sets out why the area is considered to have special architectural and historic interest, the local and national context related to the development along Caxton Avenue and Coombelands Lane, including its history and details of the original design of the houses. If the area is ultimately designated, this will help inform applicants and decision makers as to why the area is significant when planning applications in the area are under consideration.

Local consultation (in line with the relevant legislation) is due to take place on the proposed designation and introduction of the CAA for a four-week period (if approved by the Council's Planning Committee). Consultation gives local residents the opportunity to be more involved in the CA designation and appraisal process and informs them of the decision-making process if the designation is formally made.

The CA designation, if made, is not expected to affect any RBC employees. However, in terms of service users/members of the wider community, it has been identified that that the designation has the potential to impact on those who live in or visit the proposed Conservation Area who have the protected characteristic(s) of age or disability given the additional policy requirements which would apply and which would add additional controls in terms of the changes that can be made to the external appearance of a buildings within the designated area. Whilst CA designation does impact on the planning process, any proposal that requires planning permission within the designated area will be judged on its planning merits (including any personal circumstances / equalities issues raised by the applicant which could be material considerations weighed in the planning balance).

**B. Is this policy, function or activity relevant to equality? Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential based on adverse impacts or unlawful discrimination.**

**The Protected Characteristics are; Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.**

There is the potential for there to be inadvertent negative impacts upon those residents who live in / visit the area if they were to have protected characteristics, such as being elderly or disabled, as the higher design standards / limitations that CA status can impose on an area could result in it being harder for adaptations to be made to buildings, e.g., the installation of ramps to access a property.

A review of the comments received following the public consultation will be undertaken and any implications in terms of equalities will be discussed with the Council's Equality Group before a report is brought back to the Planning Committee recommending whether a CA designation in this part of the Borough should still be pursued.

**If the policy, function or activity is relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy function or activity does not engage any protected characteristics, then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.**

**C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion? Alternatively, if it is considered that there is an impact on any Protected Characteristics, but measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.**

A four-week public consultation on the proposed Conservation Area designation at Caxton Avenue will provide the opportunity for relevant consultees to provide comments. Any comments made which relate to equalities matters will be carefully considered and discussed with the Council's Equalities Group before a report is brought back to the Planning Committee recommending whether a CA designation in this part of the Borough should still be pursued.

If designated, the Caxton Avenue CA will benefit most elements of the community who live and/or visit this part of the Borough. This includes benefits which result from the protection and enhancement of the area covered by the designation.

This EqIA screening has picked up potential negative impacts on those with the protected characteristics of age and disability, however, it is not considered that a full EqIA is required as the Government requires Local Authorities to designate Conservation Areas through primary legislation where they have been identified to have special architectural or historic interest, and the Council is following this process. Also, as set out earlier in this screening, personal circumstances can be weighed in the planning balance when determining planning applications.

Date completed: 12/10/2022

Sign-off by senior manager: Georgina Pacey

## Adoption of the Runnymede Parking Guidance Supplementary Planning Document (SPD) (Planning Policy and Economic Development Services, Mike Corbett)

### Synopsis of report:

To support the implementation of the Runnymede 2030 Local Plan, it is important that up to date parking guidance is adopted to support the delivery of sustainable development in the Borough.

Parking guidance for the Borough as a Supplementary Planning Document has been prepared based on national, sub regional and local policies, and also taking into account the opinions of Councillors and local residents. The draft SPD has also undergone a period of public consultation, during which representations have been received. These representations have now been considered by officers. The Draft SPD has been the subject of screening in respect of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) which have concluded that neither a SEA nor HRA is required.

A total of 16 representations were received during the course of the public consultation which ran from Friday 1<sup>st</sup> July to Friday 12<sup>th</sup> August 2022. A copy of the Consultation Statement which summarises these representations and how they have been taken into account is set out at Appendix B. In summary, following the consideration of the comments made during the period of public consultation, the following key amendments below are recommended to be incorporated into the SPD prior to its adoption:

- Updating of title page and addition of document footer throughout to refer to the name of the document and adoption date;
- Addition of a Version Control table at the start of the document;
- Deletion of the text regarding the public consultation;
- Splitting chapter 2 into two separate chapters-the first focussed on the planning and transport policy background to the document (Chapter 2) and a new chapter (chapter 3) focussed on transport statistics. The latter chapter has been added to include more information on expected trends in car ownership, as well as more information on cycling (including e bikes and cargo bikes);
- References to Local Transport Plan 4 updated following its adoption;
- Amendment of the minimum measurements for garages where cycle storage is proposed from 3 x 7m or 4 x 7m to 3.3 x 7m or 6x 4m as contained in chapter 4;
- Addition of further text to encourage the provision of electrical sockets adjacent to any secure cycle parking in chapter 4;
- Confirmation that in non-residential development where disabled parking spaces are required, at least one of these spaces should incorporate EV charging facilities.
- a new chapter has been added (chapter 5) to set out the review process for the SPD.
- Deletion of prescribed visitor parking standards for new residential development (Appendix 2) and replacement with some general text to confirm that proportionate, well integrated visitor parking is encouraged in residential schemes as appropriate;
- Amendment of parking standard for 4+ bedroom units from 3 to 2 spaces (Appendix 2);
- Addition of notes to the table at Appendix 2 confirming how town centres are defined for the purpose of the guidance and to confirm how accessibility of a site to alternative sources of sustainable transport and key services may alter the amount of parking provision considered necessary at a site;
- Confirmation in Appendix 3 (EV charging standards) that the guidelines are for minimum provision.

Other minor changes are also recommended. All changes made can be viewed in full in the tracked change document contained at Appendix A.

None of the amendments proposed are considered to change the general purpose of the SPD in that it continues to set out appropriate parking standards across the Borough for new development. Therefore, as the amendments are relatively minor in nature, it is considered that no further consultation is required prior to the adoption of the SPD.

The modified SPD as recommended for adoption is attached at Appendix A. Once adopted, the SPD will be a material consideration for the purposes of the determination of planning applications.



## Recommendation(s):

### The Planning Committee is asked to:

- 1. APPROVE the Runnymede Parking Guidance Supplementary Planning Document (SPD) as modified and as set out at Appendix A for adoption with an implementation date of 16<sup>th</sup> November 2022.**
- 2. Give delegated authority to the Local Plans Manager, in consultation with the Chair and Vice-Chair of the Planning Authority to update the SPD on receipt of the updated EV charging standards published by Surrey County Council (expected imminently).**

## 1. Context of Report

- 1.1 The Borough Council's extant parking guidance was adopted over 20 years ago in October 2001. The standards are significantly out of date and are given limited weight by the Development Management team in the decision taking process for this reason.
- 1.2 Since adoption of the current guidance, much has changed, including national planning guidance, the requirement to deliver sustainable development, the encouragement of more sustainable forms of travel such as walking and cycling and the increased use of electric cars.
- 1.3 In November 2021, Surrey County Council (SCC) also updated its Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development to provide updated guidance for parking across the county, to help the Borough and District councils across Surrey develop their own updated standards. Runnymede Borough Council also adopted its Runnymede 2030 Local Plan in July 2020.
- 1.4 The 2030 Local Plan is part of the wider Development Plan that guides development decisions in the Borough of Runnymede. Relevant policies include:
  - Policy SD3 – Active and Sustainable Travel  
- States that the Council will support development proposals which enhance the accessibility and connectivity between people and places by active and sustainable forms of travel.
  - Policy SD4 – Highway Design Considerations  
-States that relevant design and parking standards for vehicle and cycle parking within development proposals will be assessed against the Council's current adopted guidance.
- 1.5 The Runnymede Design SPD was approved for adoption in July 2021. It seeks to provide design guidance to supplement policies within the adopted Runnymede 2030 Local Plan so that applicants are clear about the Council's expectations for development and high-quality design.
- 1.6 The SPD provides design guidance on parking in 'Design Standard 23: Providing for Vehicle and Cycle Parking'. The SPD states that;

*"The dominance of parking can be unattractive and compromise the quality of the public realm and can deter other forms of movement, like walking and cycling, which can in turn undermine social interaction and any sense of community. Poor layouts are achieved when the needs of cars are put before the needs of people. A balance needs to be found where sufficient parking can be accommodated, but where it does not result in negative or unintended consequences."*
- 1.7 Officers commenced work on the production of updated parking guidance for the Borough in 2019. The replacement guidance once adopted will replace the Borough Council's extant parking guidance from October 2001.

- 1.8 Draft revised parking standards were brought before the Planning Committee in June 2022 and approved for public consultation. All comments made during this period of consultation have now been taken into account and the Runnymede Parking Guidance SPD has been finalised.
- 1.9 The Runnymede Parking Guidance SPD will help to support Local Plan policies which relate to the design and layout of new development, and parking considerations related to this. The SPD also provides developers and other interested parties with guidance, best practice and signposts to advice and other stakeholder strategies related to relevant matters associated with parking and transport.

## **2. Report**

- 2.1 A significant amount of time has been spent preparing the Runnymede Parking SPD. During its development, discussions have been held with elected members, Royal Holloway University of London and the Surrey Transport Development Planning Team at the County Council. A specialist consultancy firm (Project Centre Ltd) was also appointed to carry out further detailed work in relation to Office and Purpose Built Student Accommodation in the Borough, with bespoke advice being given on appropriate locally derived parking standards for these two uses.
- 2.2 Local people and other stakeholders have also been consulted on the draft SPD and given the opportunity to comment between Friday 1<sup>st</sup> July and Friday 12<sup>th</sup> August 2022. Sixteen representations were received during the period of consultation. The Statement of Consultation summarises the comments made as part of the informal consultation with the Surrey Transport Development Planning team and through the representations received on the draft SPD. The Statement of Consultation can be viewed at Appendix B.
- 2.3 As part of the public consultation, a presentation and Q and A session was arranged to allow an opportunity for local people to attend and ask questions about the parking standards developed for offices and student parking, however only 1 individual expressed an interest in attending this event, who was then unable to attend. A separate telephone call was arranged with this individual to respond to his queries.
- 2.4 In light of the representations received during the period of public consultation, a number of modifications are proposed to the Runnymede Parking Guidance SPD. The modifications are shown within the SPD attached at Appendix A to this report.
- 2.5 Aside from the modifications shown in Appendix A (and as also described in Appendix B), the key elements of the SPD remain unchanged from the draft iteration which was approved for public consultation by the Planning Committee in June 2022. Therefore, as the amendments are relatively minor in nature and do not change the general thrust or substance of the SPD, it is considered that further consultation is not required and therefore the Planning Committee is asked to adopt the Runnymede Parking Guidance SPD with the modifications set out in Appendix A.

## **3. Policy framework implications**

- 3.1 Supplementary Planning Documents (SPD) do not form part of the Development Plan for Runnymede but are a material consideration in decision taking. The adoption of this SPD would support the following Local Plan objectives, in particular:
  - 4) To ensure Runnymede's communities are supported by new or enhanced community and other infrastructure services and facilities, including a range of sustainable and active travel choices;
  - 5) To deliver a garden village at Longcross which achieves a sustainable community capable of meeting its own day to day service needs and which offers a choice of sustainable and active travel modes;
  - 6) To increase resilience to climate change, including flood risk, to reduce greenhouse gas emissions and promote water efficiency and the use of renewable and low carbon energy;
  - 13) To support projects which improve the integration of road and rail to reduce congestion and improve accessibility to a range of sustainable and active travel choices.

- 3.2 Once adopted, this SPD will support the Council's draft Climate Change Strategy, particularly action reference PPAT 2.0 which seeks to, 'Facilitate & encourage active transport in the Borough: Reduce traffic congestion; Improve air quality; Improve health & wellbeing; and reduce vehicle emissions'. It will also support priorities 5 and 6 from the draft Economic Development Strategy as reproduced below:

**Priority 5: Better infrastructure for sustainable growth:** Improve the Borough's competitive performance through provision of improved infrastructure to support mobility, communications, health and well-being.

**Priority 6: Developing a low carbon economy**

Support and encourage businesses to be more sustainable. This could mean aiding businesses to become more energy efficient or to develop more sustainable business practices within their own operations and those of their supply chains. The council will share good practice in sustainability and will encourage and support businesses to develop green products and services.

**4. Resource implications (where applicable)**

- 4.1 The costs associated with this work have been met through the Council's approved 2019/2020 and 2020/2021 budgets for Planning Policy, and additional funding was secured specifically for this project following approval by Corporate Management Committee. Remaining project costs are expected to be minimal but would be met through the Council's 2022/23 budget for the Planning Policy team.

**5. Legal implications**

- 5.1 Officers are not aware of any legal implications as a result of the adoption of this SPD. Following adoption however, Members should be aware that in accordance with Regulation 11(2)(c) & (d) of the Town & Country Planning (Local Planning)(England) Regulations 2012 (as amended), any person with sufficient interest in the decision to adopt the Runnymede Parking Guidance SPD may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and, in any event, not later than 3 months after the date on which the SPD is adopted.

**6. Equality implications**

- 6.1 The Council has a Public Sector Duty under the Equalities Act 2020 to have due regard to the need to:
- a) Eliminate unlawful discrimination, harassment or victimisation;
  - b) Advance equality of opportunity between persons who share a Protected Characteristic and persons who do not share it;
  - c) Foster good relations between those who share a relevant protected characteristic and persons who do not share those characteristics;

in relation to the 9 'Protected Characteristics' stated within the Act.

- 6.2 The draft Runnymede Parking Guidance SPD was screened to establish whether there may be an impact, whether positive or negative, on any of the nine protected characteristics (namely, age, disability, race/ethnicity, pregnancy and maternity, religion, sexual orientation, sex, gender reassignment and marriage/civil partnership). The conclusion of the screening assessment confirmed that the draft SPD complies with the Council's duty under S149 of the Act and that subject to a further review following the conclusion of the consultation process, a full Equalities impact Assessment was not required. The EqIA screening assessment has been reviewed and updated in light of the modifications proposed to the draft SPD and is attached at Appendix C for information. The conclusion of the updated EqIA screening assessment remains that a full EqIA assessment is not required, and that there are no known negative equality implications which are expected to arise as a result of the adoption of the SPD.

**7. Environmental/Sustainability/Biodiversity implications**

- 7.1 A detailed Sustainability Appraisal (SA) was carried out upon the Runnymede 2030 Local Plan. The draft Parking Guidance SPD is supplementary to the Local Plan and therefore does not require a separate SA.
- 7.2 The SPD has however undergone Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening. That screening has concluded that there will be no likely significant effects on designated habitats or any other significant environmental effects as a result of the guidance included in the SPD. This conclusion was confirmed by the three statutory bodies (Environment Agency, Historic England and Natural England), in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004.
- 7.3 Appropriate parking standards have the potential to help meet the Local Plan's aims to reduce travel by private car and encourage more active and sustainable travel by encouraging less use of vehicle transport and more walking and cycling. The revised parking guidance will, when adopted, make a contribution towards the Borough's actions on climate change. Please see comments in section 3 above in terms of how adoption of the SPD has the potential to support the Council's draft Climate Change and Economic Development Strategies.

## 8. **Conclusions**

- 8.1 The revised Runnymede Parking Guidance SPD has been prepared to reflect the up-to-date guidance set out in the NPPF and to support the policies contained in the Runnymede 2030 Local Plan. The guidance has been prepared taking account of national planning guidance and the updated parking guidance published by Surrey County Council in November 2021. The additional consultancy work undertaken by Project Centre Limited has also been fed into the draft SPD and has been used to set the recommended parking standards for new office developments and PBSA schemes. The guidance drafted seeks to provide a degree of certainty for developers and communities in respect of the levels of vehicular and cycle parking that will be required in association with new development but also provides flexibility to assess individual schemes where a different parking solution may be more appropriate given the nature of development proposed. The draft revised guidance also seeks to take account of the locational characteristics and the ability to travel by walking, cycling and use of public transport where those modes of travel are convenient options, the need to plan for greater use of electric vehicles in the future and the potential need to control on-street car parking in certain locations through the use of controlled parking zones (CPZs).
- 8.2 The SPD is now recommended to the Planning Committee for adoption, with an implementation date of 16<sup>th</sup> November 2022. Once adopted, the new guidance will then become an important material consideration for planning decisions and will be published on the Council's website. Applicants and promoters will be advised of the guidance through the pre-application and planning application processes.

(To resolve)

### **Background papers**

Appendix A-Runnymede Parking Guidance SPD (as modified)

Appendix B-Statement of Consultation

Appendix C-EqIA Screening Assessment Update

# **Runnymede Borough Parking Guidance**

**Supplementary Planning  
Document (SPD). Version 1.0**

**Runnymede Borough Council**

**November 2022**

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**Version Control**

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Changes</b>
1.0	9 <sup>th</sup> November 2022	Georgina Pacey	

DRAFT

## Executive Summary

Parking guidance associated with new development is an important element of the Council's strategy to support sustainable development and to help encourage modal shift to more active and sustainable travel options such as walking, cycling and the use of public transport, in line with national planning policy (the NPPF).

In setting new local car parking guidance, the Council has been particularly mindful of advice in the NPPF which states that any guidance should take account of:

- a) "The accessibility of the development;
- b) The type, mix and use of development;
- c) The availability of and opportunities for public transport;
- d) Local car ownership levels; and
- e) The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles"

The NPPF also advises that maximum car parking standards for new development should only be set where there is a clear and compelling justification that they are necessary, either for managing the local road network or to optimise the density of development in city and town centres or other locations that are well served by public transport.

In setting new local and flexible parking guidance, the Council has sought to strike the right balance between providing sufficient parking for the occupiers of new development, whilst also encouraging modal shift when other more sustainable and active travel options are readily available.

The Council has also prepared a new Local Plan for the Borough up to 2030. This new parking guidance is designed to reflect and help deliver against the policies it contains.

The new local parking guidance replaces previous car parking guidance from 2001, reflecting the changes that have taken place in modal and vehicle use since 2001, including increased cycle use and the use of electric vehicles, as well as increasing concerns about air quality and climate change in respect of emissions from combustion powered vehicles.

The new parking guidance draws upon Surrey County Council's updated Vehicular and Cycle Parking Guidance (adopted in November 2021). The Council has closely followed the Surrey Guidance in preparing its own guidance, whilst incorporating some changes to take account of local character and the settlement pattern of the Borough and the potential for the Council to consider controlled parking zones in future, where high levels of on-street car parking prevail.

To complement the Council's new parking guidance, it is crucially important that travel plans are prepared for new development proposals which generate significant traffic movements



in order that active and sustainable travel patterns and behaviours are reinforced and dependence on travel by car is reduced as far as possible.

The parking guidance takes account of comments from local residents and other interested parties as expressed during the consultation stages of the new Local Plan, through the consultation held on this SPD, as well as from learning from developments that have taken place in the Borough.

Land-use-specific parking and electric vehicle charging point standards set out in this guidance can be found at Appendices 1 to 3. Further advice specific to the design of parking areas is set out in the Runnymede Design SPD for the Borough which was implemented in July 2021.

This parking guidance has Supplementary Planning Document (SPD) status and is a material consideration in the determination of planning applications in the Borough.

### **Current consultation**

This draft Runnymede Parking Guidance SPD is open for public consultation from Friday 1<sup>st</sup> July to Friday 12<sup>th</sup> August 2022. Any comments should preferably be returned by e-mail to [planningpolicy@runnymede.gov.uk](mailto:planningpolicy@runnymede.gov.uk) or alternatively can be posted to:-

Planning Policy and Economic Development

Runnymede Borough Council

Runnymede Civic Centre

Station Road

Addlestone

Surrey, KT15 2AH

Please note, comments made through the period of consultation, or a summary of them, will be made publicly available and cannot be treated as confidential. Personal details including addresses, email addresses, signatures and telephone numbers will not be published on our website.

If you have any queries or require any further information please call the Council's Customer Services team on 01932 838383 or email [planningpolicy@runnymede.gov.uk](mailto:planningpolicy@runnymede.gov.uk).

## 1. Introduction

1.1 This guidance advises upon the appropriate levels of car parking, cycle parking and electric vehicle charging points for different types of new development in the Borough.

1.2 The following key documents are considered relevant:

- The Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' in January 2018 and National Design Guide in January 2021;
- HM Government's 'The Road to Zero', Industrial Strategy policy paper
- National Planning Policy Framework (NPPF) 2021, paying particular regard to the need to promote sustainable transport;
- Surrey Local Transport Plan 4 July 2022, Surrey Parking Strategy (updated January 2020), Surrey Vehicular and Cycle Parking Guidance (November 2021) and Car Clubs in new developments (March 2019);
- The adopted Runnymede 2030 Local Plan (July 2020); and draft Runnymede Climate Change Strategy (scheduled for adoption in Autumn 2022).

1.3 In addition, the following background context is considered relevant:

- The changes that have taken place in modal and vehicle use since 2001, including increased cycle use and the use of electric vehicles; and
- Increasing concerns about air quality and climate change in respect of vehicle usage.

1.4 The parking guidance included in this SPD recognises that town centre locations in the Borough generally offer sustainable travel alternatives to trips by private car. This means that there are more opportunities within and near the Borough's town centres for active and sustainable travel, and less need to provide equivalent levels of car parking as part of new development within a town centre location. During the preparation of this guidance, travel patterns have also been significantly affected by the COVID-19 pandemic. The extent to which the consequences of the pandemic will change travel patterns and parking requirements in the long term is currently unknown, but the guidance is written to be flexible, in order that some degree of discretion can be exercised when considering the parking implications of development proposals in future.

### The Need to Review the Parking Guidance

1.5 The Council's current parking guidance was adopted in 2001 to support the policies within the Runnymede Borough Local Plan, Second Alteration (2001). Transport strategies have changed significantly since this guidance was adopted, with much greater emphasis on travelling sustainably. However, car ownership levels also remain high in the Borough, and many residents remain concerned regarding traffic levels and the need to provide sufficient car parking associated with new development which is proposed in their area.

- 1.6 The Runnymede 2030 Local Plan is consistent with the presumption in the NPPF in favour of sustainable development. Policy SD3 specifically promotes active and sustainable travel and Policy SD4 refers to guidance for parking, as part of the overall transport strategy of the Plan.
- 1.7 The Local Plan proposes nearly 8,000 new homes in the Borough up to 2030, along with approximately 80,000sqm of additional employment floorspace and about 6,000sqm of new retail floorspace. This quantum of development will place additional pressure on local transport infrastructure including parking.
- 1.8 There has also been a notable increase in electric vehicle ownership and cycle usage since the previous guidance was adopted. The new parking guidance reflects these changes, providing for more cycle parking than the existing 2001 guidance and also reconfirming Surrey County Council guidance for electric vehicle charging points which Local Plan policy SD7 requires applicants to comply with subject to feasibility. The intention is that the guidance will therefore help to promote healthier lifestyles, but also reflect climate change concerns and Government policy to restrict the future sale of combustion powered vehicles.
- 1.9 The Borough has also seen an increase in student and older populations since the previous guidance was adopted and standards are incorporated into this guidance specific to development proposals for these groups.

## 2. Planning and Transport Policy Context

### National Planning Policy Framework (NPPF) (July 2021)

- 2.1 National planning policy has, as one of its core principles, a requirement to actively manage patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made more sustainable.
- 2.2 Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. National policy refers to a transport system being balanced in favour of sustainable transport modes, giving people a real choice about how they travel. The NPPF also requires all developments that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment and accompanying Travel Plan to determine and manage the likely impact of the proposed development.
- 2.3 Paragraph 107 of the NPPF sets out the Government's approach to local parking standards as follows:

*"If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*

- *the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunity for public transport;*
- *local car ownership levels; and*
- *the need to ensure an adequate provision of spaces for charging plugin and other ultra-low emission vehicles"*

- 2.4 Paragraph 108 (chapter 9) states the following

*"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists."*

### National Design Guide (January 2021)

- 2.5 The National Design Guide illustrates how well-designed places can be achieved in practice and sets out ten characteristics that should be incorporated into new developments.

- 2.6 It articulates the need to consider how buildings and places relate to their context, referencing the importance of hard and soft landscaping and the treatment of transport infrastructure.
- 2.7 The Government publication identifies that peoples' patterns of movement are integral to well-designed places (para 75). It promotes well considered parking, servicing, and utilities infrastructure for all uses.
- 2.8 The guide advocates compact forms of development to make destinations easily accessible by walking or cycling and to reduce dependency upon the private car. It also recognises that how parking is arranged has a fundamental effect on the quality of a place or development, noting how parking standards are set locally and vary in response to local conditions.
- 2.9 It highlights how the provision and treatment of parking has the potential to enhance the overall quality of place, as well as influencing the lifestyles of occupants and other users, as well as contributing to climate change mitigation and adaptation.
- 2.10 The guide also identifies the role of a well-designed movement network in defining a clear pattern of streets that limits the impacts of car use. In respect of parking, it stresses that this should be attractive, well landscaped and sensitively integrated into the built form so that it does not dominate the development or the street scene, with effective use of trees to soften the visual impact, improve air quality and contribute to biodiversity.

#### **Surrey Local Transport Plan 4**

- 2.11 Surrey County Council adopted its new Transport Plan (known as Local Transport Plan 4 (LTP4)) in July 2022. This includes plans to reduce the 46% of carbon emissions currently generated by transport across the County. Local Transport Plan 4 supersedes the earlier Local Transport Plan 3.
- 2.12 LTP 4 sets out proposals to 2030 and beyond which include:
- Increasing safer and improved walking and cycling routes;
  - Encouraging people out of their cars;
  - Providing more charging points and parking for electric vehicles;
  - More bus services;
  - Charging for transport use;
  - Introducing car clubs;
  - Improving internet connections; and
  - Re-designing neighbourhoods that enable easier access to local services.
- 2.13 The above are tools to help in reducing the need to travel by car.

## Surrey County Council Vehicular and Cycle Parking Guidance (November 2021)

- 2.14 This updated guidance provides helpful advice to local planning authorities in Surrey when preparing their own local parking guidance.
- 2.15 The guidance recognises that the availability of car parking has a major influence on the means of transport people choose for their journeys and suggests there is a need to balance an appropriate level and type of parking with the need to protect highway safety and to promote active and sustainable travel, taking account of the opportunity for alternative modes of travel at a local level.
- 2.16 The guidance also acknowledges the increased popularity of cycling for leisure and commuting, including using e bikes; emphasising that high quality and secure cycle parking is important in all new development, and the emergence of electric vehicles and a projected growth in their ownership indicates that electric charging points must also become integral to new development (see chapter 3 for more information on this point). This SPD reconfirms the current Surrey County Council guidance on the standards of electric vehicle charging points required to comply with adopted Local Plan policy SD7 to serve both residential development and a variety of new commercial and other developments. Equally, it provides for improved cycle parking standards and encourages those standards to be applied as minimum provision, to help further encourage cycle ownership and use.
- 2.17 It also recommends the use of ‘maximum’ parking standards for new commercial and other non-residential development, such as employment uses, retailing, hotels, leisure facilities and certain institutional uses such as hospitals, colleges, care homes etc., which are all individually, or in combination with other uses, a ‘destination’ that significant numbers of people travel to and where applying a maximum limit on the availability of car parking may be an important influence upon reducing travel by car.
- 2.18 In terms of new residential development, the Surrey guidance suggests the application of ‘maximum’ standards, although it also notes that, *‘there is no policy to restrict car ownership so there is little to be gained in heavily restricting residential parking’*. For this reason, recommended residential car parking ‘standards’ are therefore included in this document as flexible ‘guidelines’ rather than more rigid ‘maximum’ or ‘minimum’ standards. This enables the locational characteristics of new residential development to be taken into account more closely, so that for example, less car parking would generally be required in a town centre location where alternative modes of transport are more readily available, whilst greater provision might be preferred in villages or more rural locations where there are fewer alternatives to using a private car.
- 2.19 The Surrey County Council guidance also recommends the provision of ‘fast charge’ electric vehicle charging points associated with all new residential development and larger scale new commercial development types (across a range of uses).

## Planning Policies in Runnymede: The Runnymede 2030 Local Plan

- 2.20 The Runnymede 2030 Local Plan contains several references to parking guidance. Policy SD4 (Highway Design Considerations) makes it clear in policy that *“Relevant design and parking standards for vehicle and cycle parking within development proposals will be assessed against the Council’s current adopted guidance”*. The parking guidance included in this SPD, is the guidance used by the Council to help assess the parking requirements associated with development proposals, until superseded.
- 2.21 Policy SD3 (Active and Sustainable Travel) states that the Council will *“support schemes and development proposals which enhance the accessibility and connectivity between people and places by active and sustainable forms of travel”*. This includes, but is not limited to, securing improvements to or contributions towards improving the capacity of cycle parking at the Borough’s railway stations, and requiring development proposals which will generate a significant number of traffic movements to submit and then implement the measures in an approved travel plan.
- 2.22 Evidence in the Council’s Strategic Highway Assessment (SHAR), which underpins the Runnymede 2030 Local Plan, identifies several ‘congestion hot spots’ including a number of junctions along the A320, and other highway issues in Runnymede. Policy SD3 aims to achieve modal shift and sets out measures to support and achieve an increase in active and sustainable travel choices. Policy SD4 requires development proposals to fully explore the impact they have on the highway network and identify measures which can be secured to mitigate their impact for all highway users including pedestrians and cyclists. The application of up to date parking guidance is part of these measures.
- 2.23 The Local Plan also considers sustainable design to be integral to good planning. Policy SD7 describes a range of sustainable design principles including measures for secure storage of cycles and also states that development proposals will be supported where they (amongst other things) subject to feasibility, incorporate electrical vehicle charging points in accordance with guidance issued by Surrey County Council.
- 2.24 Longcross Garden Village has a specific policy; SD9, which expects safe routes for all users and a range of sustainable transport choices, including a new bus service linking Longcross railway station with neighbouring settlements including Woking. Equally important to the strategy in the Runnymede 2030 Local Plan is the inclusion of Policy SL1 which promotes healthy lifestyles. This policy requires new developments to provide opportunities for walking and cycling as well as outdoor recreation and sport. These are all influences on parking requirements in new developments.

### Runnymede Design Guide (July 2021)

2.25 The Council has prepared a Design Guide SPD to provide guidance for new development in the Borough. The new Design Guide includes guidance on the design of parking for new development, to complement the Parking Guidance SPD.

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### 3. Transport statistics

#### Car Ownership Changes

- 3.1. Since the 2001 Census, overall vehicle ownership across the UK has marginally increased. In 2001, the average vehicle ownership level was 11 cars per 10 households; this had increased to approximately 12 vehicles per 10 households by 2011.
- 3.2. In Runnymede Borough, vehicle ownership also increased slightly from 84.8% of households in 2001 to 85.5% of households in 2011. Equally, the number of households with more than 1 car also increased from 14,320 in 2001 to 14,590 in 2011.
- 3.3. The table below gives further detail of the changes in vehicle ownership in Runnymede between the 2001 and 2011 censuses:

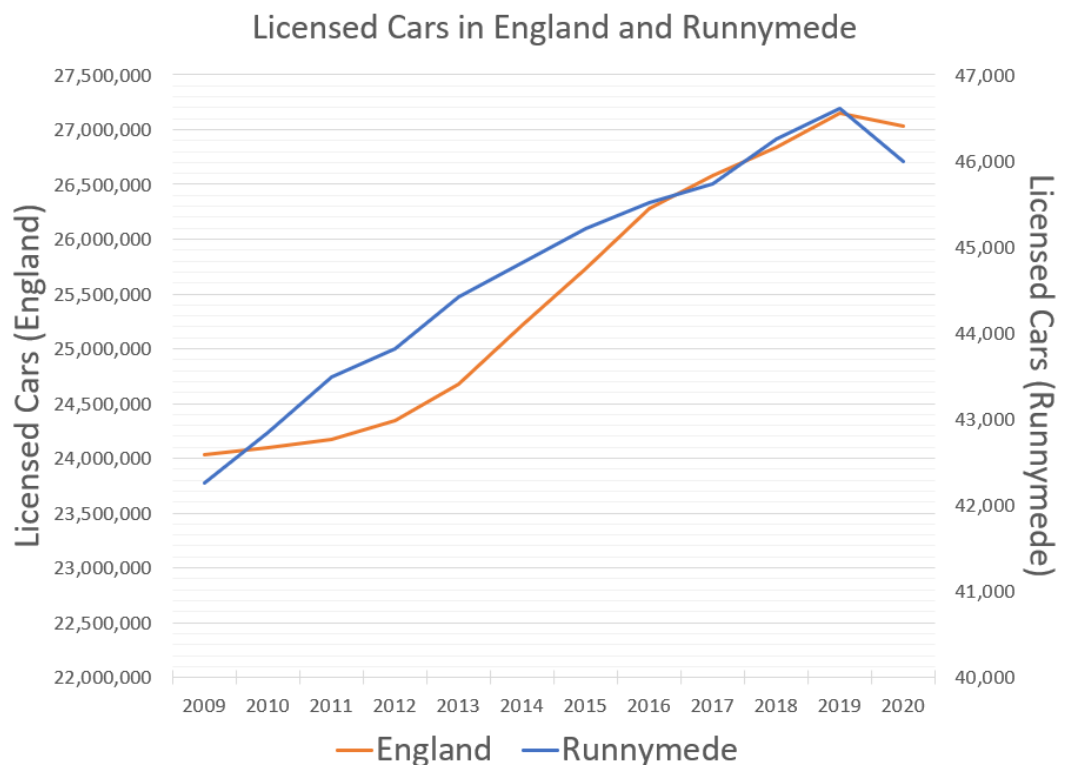
**Table 1: Car Ownership Levels Table**

Cars	Runnymede				Surrey				National (England and Wales)			
	2001		2011		2001		2011		2001		2011	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
All categories: Car or van availability	31,656	100.0	32,714	100.0	433,176	100	455,791	100	21,660,475	100	23,366,044	100.0
No cars or vans in household	4,813	15.2	4,811	14.7	60,594	14.0	59,865	13.1	5,802,183	26.8	5,989,770	25.6
1 car or van in household	12,523	39.6	13,313	40.7	175,800	40.6	184,249	40.4	9,486,366	43.8	9,861,642	42.2
2 cars or vans in household	10,834	34.2	10,711	32.7	149,976	34.6	155,920	34.2	5,095,959	23.6	5,777,662	24.7
3 cars or vans in household	2,501	7.9	2,755	8.4	34,440	8.0	39,670	8.7	976,438	4.5	1,283,780	5.5
4 or more cars or vans in household	985	3.1	1,124	3.4	12,366	2.9	16,150	3.5	299,529	1.4	453,190	1.9
Sum of all cars or vans in the area	46,061	-	48,063	-	-	-	-	-	23,936,250	-	27,294,656	-

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- 3.4. The table helps to illustrate that at the time of the 2011 Census, car ownership levels in Runnymede Borough remained high compared to the national average, though the table also shows that car ownership levels in Runnymede Borough were marginally lower than those found across Surrey.
- 3.5. The Council has further examined national and local trends in car ownership using Department for Transport (DfT) data on licenced vehicles<sup>1</sup>. Figure 1 below demonstrates that car ownership in Runnymede has been steadily increasing since 2009.

**Figure 1: Licensed car trends**



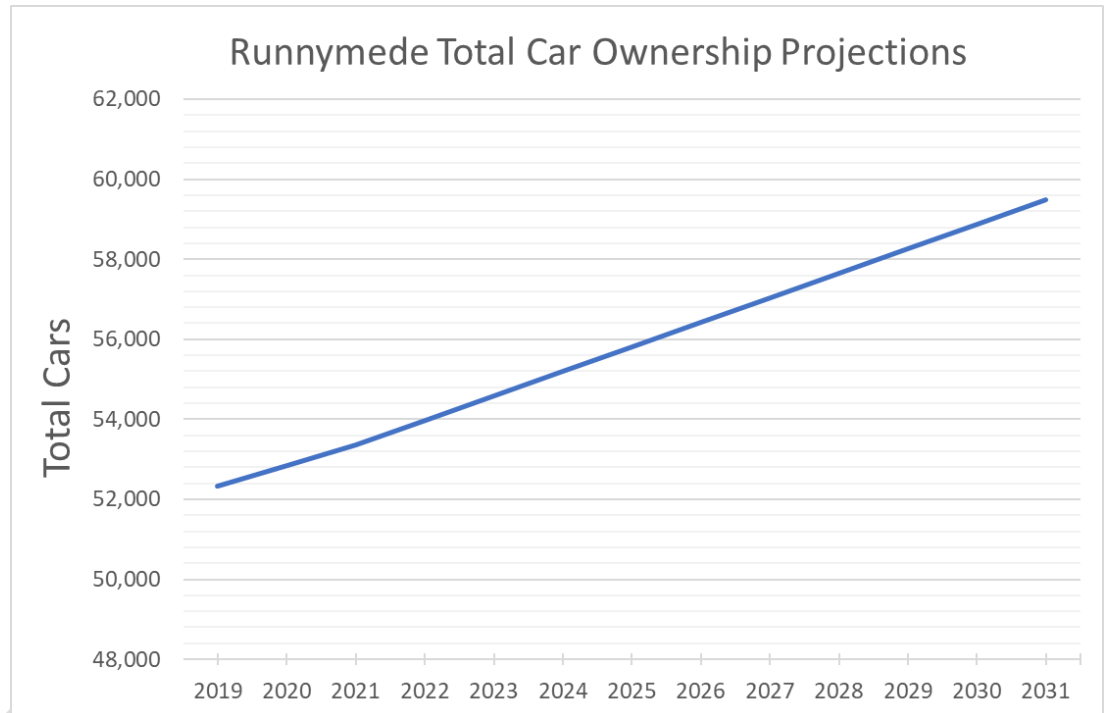
- 3.6. The trends for Runnymede have largely followed the national trend in England, although during 2010-2015 ownership increased at a more rapid rate than the national trend.
- 3.7. A sharp decrease in ownership was recorded during 2020, which is reflected in the national trend. This is likely to be due to changing travel and vehicle buying habits during the Covid-19 pandemic.

<sup>1</sup> DfT Table VEH0105: Licensed vehicles at the end of the year by body type

### NTEM Car Ownership Future Trends

3.8. The National Trip End Model (NTEM) has been interrogated to understand future trends in car ownership. Figure 2 below demonstrates that car ownership in Runnymede is predicted to continually increase to 2031.

**Figure 2: NTEM car ownership projections**



3.9. It should be noted that the NTEM future trends are based on past ownership trends, and the projected steady increase is a result of the generally steady upward trend shown in Figure 1 previously.

3.10. It is difficult to predict the long-term impacts of the Covid-19 pandemic on vehicle ownership. However, all local, sub regional (i.e., Surrey) and national policy supports reducing vehicle ownership and a gradual downward trend or levelling off is achievable as incentives towards sustainable travel take hold.

3.11. Without a step-change in alternative transport choices, NTEM forecasts shown in Figure 2 indicate car ownership could increase by 11% to 59,500 vehicles by 2031, which will have an inevitable impact on parking pressures in the area. In this regard, the sections below provide some information on alternatives to the traditional combustion engine car.

### Electric Vehicle Ownership

- 3.12. Electric vehicle ownership has increased substantially over recent years. In 2020 pure-electric sales were up by 185.9% versus 2019, while plug-in hybrid sales were up 91.2%. August 2021 saw a 32.2% increase in pure-electric car sales in the UK compared to the same month in 2020. A total of 68,033 new cars were registered in the UK in August 2021, (10.9% of the total) were pure-electric cars, (7.4%) were plug-in hybrids, and (nearly 12%) were full hybrids. Diesel and mild-hybrid diesels accounted for the remainder of sales, at 7.5% and 4.9% of the total respectively<sup>2</sup>. In Surrey, the rise in the number of electric vehicles registered in the County has been significant, with about 200 registered vehicles in 2012 and over 2,500 registered vehicles by the end of 2017<sup>3</sup>. In Runnymede vehicle registrations have also risen sharply in recent years with the number of registered vehicles more than doubling in the two years between June 2020 (453) and June 2022 (1,086). The vast majority of electric vehicles registered within Runnymede are Battery Electric, accounting for 572 (52.67%) of all electric vehicles within Runnymede. The next largest category is Plug-in Hybrid Petrol Cars. These account for 412 (37.94%) of the 1,086 registered vehicles. The remaining 102 are split relatively evenly across all other vehicle types.
- 3.13. When considering the number of charging points in the Borough, compared to the other borough and district councils in Surrey, Runnymede (38) has the fifth highest number of publicly available electric vehicle charging points behind Guildford (92), Elmbridge (54), Spelthorne (53) and Waverley (50). The 38 publicly available charge points within Runnymede represent an availability of 42.1 charge devices per 100,000 population.
- 3.14. More than 6.5m households plan to buy an electric vehicle or plug-in hybrid, research by the energy watchdog Ofgem has found. This equates to 24%, or nearly one in four of all households. The climate change committee, an independent public body that advises the UK government and devolved governments, predicts that about 18m battery and plug-in hybrid electric vehicles will be on the road by 2030 when a ban on the sale of new internal combustion vehicles is introduced<sup>4</sup>.
- 3.15. The Runnymede 2030 Local Plan and this SPD therefore supports the transition to EV vehicles by requiring a proportion of all parking spaces in new developments in Runnymede to provide EV charging facilities.

### **Cycling, including E bikes and Cargo Bikes**

- 3.16. On average, according to the Department for Transport, approximately 18% of adults in Runnymede cycle once a month, and just over 12% cycle once a week (annual averages taken over the period 2016-2021). Table 2 shows the year on year usage for

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<sup>2</sup> Driving Electric.com - Electric car sales UK: August 2021 sees electric overtake diesel for market share 6 Sept 2021.

<sup>3</sup> Figure 1: EV registrations from January 2012 to December 2017; Surrey Transport Plan: Electric Vehicle Strategy

<sup>4</sup> The Guardian – ‘6.5m households in UK plan to buy an EV by 2030’ 21st May 2021.

adults cycling at least once weekly and monthly, as well as for those cycling either 3 or 5 times a week.

**Table 2: Proportion of adults who cycle, by any purpose, frequency in Runnymede**

Frequency of cycling	2016	2017	2018	2019	2020	2021
At least once per month	18.2	22.1	17.7	17.0	18.1	15.0
At least once per week	11.4	17.3	11.0	10.4	13.3	9.8
At least 3 times per week	6.1	9.3	3.4	4.3	6.2	3.8
At least 5 times per week	4.3	4.5	2.2	2.6	3.0	0.8

Source: Department for Transport

- 3.17. As shown in table 2, significant reductions in the frequency of adults cycling fell notably across all frequencies following the COVID-19 pandemic. The reductions are for both leisure cycling and for travel.
- 3.18. The above statistics include e bike use as well as traditional cycling. In relation to the former, despite the downward trend in regular cycling between 2020 and 2021 in Runnymede (and nationally), having steadily risen in popularity over recent years, e-bike sales in the recent past have rocketed across Europe, with the COVID-19 pandemic influencing changes in travel behaviour. Many European countries have seen e-bike growth of between 30 and 40%, compared to single-digit growth in car sales. Industry experts have predicted that this growth will continue, with e-bike sales in Europe expected to increase from 3.7 million per year in 2019, to 17 million per year by 2030.
- 3.19. The UK has also witnessed this upward trend, although sales have been low compared to its neighbours in continental Europe with e-bikes accounting for just 3% of bikes sold in 2019 compared to around 10 and 30% of sales in other European countries, including those with less of an established cycling culture. The COVID-19 pandemic has accelerated sales and use of e-bikes around the world, with a 60% increase in sales of e-bikes in the UK in April 2020 alone<sup>5</sup>. This was driven by lockdown restrictions on travel; reduced capacity and the need for social distancing on public transport; as well as increased provision of temporary cycle lanes and infrastructure. There has been an increase in the use of bike share schemes too: the CoMoUK Bike Share Users Survey

<sup>5</sup> Butler, S. (2020) 'Bike boom: UK sale sup 60% in April as Covid-19 changes lifestyles', The Guardian, 26 June. Available at: Bike boom: UK sales up 60% in April as Covid-19 changes lifestyles | Retail industry | The Guardian

2020 revealed that bike share schemes attracted more new users than usual in 2020, underpinned by lockdown restrictions and the government advice to avoid public transport<sup>6</sup>.

- 3.20. E-bikes widen the appeal of cycling to more users, including those with lower fitness levels, older people and people with disabilities. They can help to overcome barriers set by the UK's often hilly terrain and enable longer trips to be made by bike, offering great potential for mode shift from the car. Furthermore, given that 68% of journeys in the UK are under five miles, there is, indeed, a huge opportunity for mode shift that e-bikes could significantly contribute to.
- 3.21. An evaluation of e-bike schemes across continental Europe found that typically around half of e-bike trips replaced car trips and that in some cases, as many as 70% of e-bike trips were previously made by car. The 2021 Fully Charged: Powering up the potential of e-bikes in city regions (November 2021) report produced by Steer also found evidence that e-cargo bikes have the potential to revolutionise first and last mile travel and logistics, replacing up to a quarter of commercial deliveries in cities, 50% of commercial service and maintenance trips, and 77% of private trips (e.g. shopping, child transport).
- 3.22. To support the growth and use of bicycles including electric bikes, chapter 4 of this SPD requires applicants to provide secure cycle parking in new developments and encourages the provision of electrical sockets adjacent to any secure cycle parking.

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<sup>6</sup> CoMoUK (2020) Bike share user survey. Available at: [CoMoUK-Bike-Share-Survey-2020.pdf](#)

## 4. Parking Guidance for Runnymede

- 4.1 The parking guidance in this SPD seeks to ensure the provision of appropriate levels of car and cycle parking associated with all new development. The guidance applies to both residential and non-residential development, and sets out provision for car parking, cycle parking, and parking for people with limited mobility. The increased use of car clubs is also considered as is the approach to parking requirements within or associated with controlled parking zones (CPZs).

### Car Parking Guidance for Non-Residential development

- 4.2 Many non-residential uses do not require new car parking to be provided, unless the scale of the development is significant, or the nature of the development makes it appropriate to do so. In line with Surrey County Council's approach, the car parking standards for non-residential uses set out in this guidance are expressed as maximums, in order to encourage travel to 'destinations' by means other than the private car and to prevent excessive car parking provision at those destinations. Town centre locations of course, generally offer alternative travel options and public car parking. It is in these locations where densities of development can be higher to help make the most effective use of land in the most sustainable locations, and where in particular, private car parking provision can be lower. The new parking guidance for non-residential development in Runnymede is at Appendix 1.
- 4.3 Parking requirements associated with residential institutions such as student accommodation, care homes and extra-care provision are also included in the non-residential guidance as they are essentially commercial entities with specific car parking requirements, that are very different from normal residential use.
- 4.4 The Council recognises that Royal Holloway University of London's (RHUL), located in Englefield Green, has clear policies to encourage students, staff and visitors to travel to the university campus by sustainable transport modes. However, due to concerns locally regarding high demand for on street parking in the surrounding residential areas, the Council commissioned parking surveys in 2021 to determine whether Purpose Build Student Accommodation (PBSA) schemes in the locality were resulting in overspill parking. The survey results found that high levels of on street parking were being exacerbated by non-residential demand, including people commuting to the area during the day time, potentially including those travelling to the University, rather than from PBSA.
- 4.5 Where new non-residential development including (but not limited to) student accommodation, other university-related development, new office development or new C3 residential development takes place within or immediately adjacent to any areas where significant parking restrictions such as CPZs are considered necessary, the Council will seek contributions from developers towards the set-up and capital renewal costs of those parking restrictions and/or CPZs as part of its strategic approach



towards managing car parking issues in the locality and associated with such developments; and will assess the potential impacts of each proposal on levels of on-street car parking in the locality on a case-by-case basis. It must be recognised however that there are a number of risks associated with securing and funding in perpetuity new CPZs via the planning system. For example, there is no guarantee that there will be sufficient developments coming forward (and therefore funds forthcoming) over the years to allow for CPZs to be free-for-use (or at reduced cost) for residents in the long term. Therefore, where CPZs are introduced in the Borough, there is the chance that the ongoing running costs of such schemes will need to be covered by residents paying for permits in these areas.

- 4.6 Some larger scale non-residential developments may benefit from a bespoke car parking scheme, appropriate to that use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the location of the development, the ability of people to walk, cycle or travel by public transport to the development and the policy of the institution to provide or subsidise public transport services, and/or restrict car travel to their site.
- 4.7 Where it has been indicated that an individual assessment for parking is more appropriate to the nature of development proposed (e.g. leisure centres, hospital expansion, new places of worship etc.), the Council will generally require the following information to be provided by applicants as part of this assessment:
- a parking management plan;
  - a travel plan and/or;
  - a cycle strategy.

**Parking for disabled drivers:**

- 4.8 In accordance with Surrey County Council guidance, parking for disabled drivers needs to be fully considered when planning a development. For non-residential development, an additional 5% of total parking spaces should be allocated for disabled users or a minimum of 1 space per 750m<sup>2</sup> of gross floor area (whichever is the greater) to meet demand. Such spaces should have dimensions of 3.6m by 5m and be located no further than 50m from an accessible entrance (ideally the main entrance), clearly signed and undercover. All parking for disabled drivers should be designed and provided in accordance with the appropriate government guidance.

## **Car Parking Guidance for Residential development**

- 4.9 The Surrey County Council Vehicular and Cycle Parking Guidance (November 2021) provides the initial basis for the residential parking guidance in this SPD, adjusted to take account of the characteristics of the Borough. Parking guidelines for new residential development in Runnymede are set out at Appendix 2.

- 4.10 The parking guidance included in this SPD expresses neither a maximum nor minimum standard for residential development. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.
- 4.11 Residential parking in town centre locations is likely to be reduced due to more convenient access to public transport, the availability of public car parks, convenience of access to local facilities to which it is possible to walk and cycle, the need to make the most efficient use of land, and to ensure the urban fabric is not dominated by private car parking provision.
- 4.12 In residential schemes, parking spaces within garages will be counted towards the overall parking provision providing that the internal dimensions of each parking space measure, as a minimum, 6m x 3m, to ensure that a large modern car can be accommodated. Where garages are below this size, they will not be counted towards the parking requirement. For car ports/ car barns the recommended minimum dimensions are 2.9m x 5.5m. Where cycle storage is proposed within a garage, larger garages with dimensions of ~~3m x 7m or 4m x 7m~~ **3.3 x 7 or 6 x 4** would be considered appropriate. This would allow for cycle storage either at the front/rear of the garage or to the side.
- 4.13 The guidance for residential development set out in Appendix 2 only applies to new residential development and not to the conversion or sub-division of existing properties in the Borough. This is because the generation of parking requirements from existing uses are generally considered to be consistent with buildings in the same location.

### **Parking Space dimensions**

- 4.14 For both residential and non-residential developments, the minimum dimension of a car parking space should be 2.5m x 5.0m. See paragraph 3.8 above for details of the size requirements for disabled parking spaces.

### **Car free developments**

- 4.15 There may be instances where the Council will support new developments in the Borough which propose no vehicular parking. This is likely to be in the Borough's town centres, in other locations which are deemed to be highly sustainable, or where a site owner/operator has policies and/or practices in place in perpetuity which can be demonstrated to restrict car travel to their site.

### **Cycle Parking**

- 4.16 The aim of enabling more people to cycle as an alternative to car trips requires safe cycle routes and convenient and safe cycle parking. The Local Plan encourages a modal shift from reliance on the private car to active and sustainable modes of transport including cycling. The Council is aware of the need to keep under review the wider requirements for high quality, secure and convenient cycle parking in each of its town, local and village centres. Cycle parking needs to include external storage space that is secure, covered and lit, or provided as space within a garage large enough to accommodate cycles as well as park a car.
- 4.17 Cycle parking will be required in all new residential and many non-residential developments. The provision of safe and secure cycle parking associated with new development in town centres is particularly important, where car parking associated with new development will be reduced and there is the ability to further encourage cycling as an active form of travel, including the use of more expensive e-bikes. Cycle parking provision set out in this SPD is expressed as minimum guidance to further encourage cycle ownership and more cycling trips to be undertaken.
- 4.18 In order to support the growth and use of electric bikes, consideration should be given to the provision of electrical sockets adjacent to any secure cycle parking provided.

### **Electric Vehicle Charging Points**

- 4.19 Appendix 3 of this SPD sets out the current Surrey County Council guidance for the provision of 'fast charge' electric vehicle charging points as set out in their November 2021 Vehicular and Cycle Parking Guidance document. At the time of producing this SPD, this was the most up to date guidance produced by Surrey County Council on this matter. In line with adopted policy SD7 from the Runnymede 2030 Local Plan, subject to feasibility, development proposals will be supported where they incorporate electrical vehicle charging points in accordance with Surrey County Council guidance on electric vehicle charging points. Notwithstanding the content of appendix 3 of this document, should any updated guidance be adopted by the County Council on electric vehicle charging standards following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.
- 4.20 In non-residential developments where disabled parking spaces are made available, a proportion of these parking spaces should also benefit from EV charging points, with a minimum of one EV parking space being expected for disabled users. The charging points which serve disabled parking bays should adhere to any published national standards on accessible EV charge points which are in force at the time of determination of the planning application.

### **Travel Plans**

- 4.21 Surrey County Council Vehicular and Cycle Parking Guidance (November 2021), promotes schools to develop, update and monitor School Travel Plans. There is a

similar expectation with other institutions, large scale commercial and residential schemes. The County Council has separate guidance on Travel Plans available on their website. Runnymede Borough Council fully supports and will implement the County Council's guidance in respect to travel planning. Should any updated guidance be adopted by the County Council on Travel Plans or School Travel Plans following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.

### **Car Clubs**

- 4.22 Surrey County Council guidance was published in March 2019. Car clubs offer clear benefits for individuals, with cost savings and access to a range of low carbon, well maintained, flexible use vehicles. Car clubs also support policies to cut congestion, reduce emissions, improve air quality, reduce parking pressure and increase take up of sustainable travel modes. There are opportunities for car clubs to be incorporated within new developments in Runnymede and therefore the Borough Council will continue to fully support and implement the County Council's guidance in respect to car clubs.

### **Coach/Bus**

- 4.23 In accordance with the guidance set out by Surrey County Council in its Vehicular and Cycle Parking Guidance (November 2021), on all new school sites where it is likely that pupils will travel to and from school in coaches, sufficient space should be reserved to allow coaches to enter the site, drop off and pick up pupils. Where appropriate, bus stops, bays, raised kerbs, seating and shelters shall be provided on the highway by the applicant.

### **Equality Act**

- 4.24 The Equality Act 2010 requires that all members and sections of the community are taken into consideration when preparing planning policies and guidance. People with protected characteristics may have difficulty in accessing facilities and services, as well as experiencing restrictions in choices about where to live and work and spend free time. It is therefore important that new development ensures that all residents, visitors and employees within the Borough are not disadvantaged through guidance which further restricts accessibility and choice. Therefore, this guidance has been produced to be flexible and adaptable to address all needs. It has also been subject to an Equalities Impact Assessment (EqIA) screening.

## 5. Review of this SPD

- 5.1 This SPD will be the subject to regular review, with the first review being scheduled to take place 3 years post adoption. In the intervening period, where the SPD requires changes which are minor in nature, or where the changes are required urgently for legal reasons, or changes in government policy and / or legislation, these changes will be approved by the Chair / Vice Chair of the Planning Committee.
- 5.2 Subject to the urgency of the change, as per paragraph 5.1 above, any major change required to the Scheme will be subject to full public consultation.
- 5.3 All changes to this SPD will be noted within the Version Control on page 1 of the document, and an updated SPD will be uploaded to the Council's website.

## Appendix 1 – Non-Residential Vehicle and Cycle Parking Guidance, by Use Class as expressed in the Town and country Planning (Use Classes) Order 1987 as amended

Type of Use	Vehicle Parking Guidance (Maximum per m <sup>2</sup> GFA)	Cycle Parking (Minimum)
<b>Shops (Class E/F.2)</b>		
Food or non-food retail e.g.: small parades of shops serving the local community (up to 500m <sup>2</sup> )	1 car space per 30m <sup>2</sup>	1 space per 125m <sup>2</sup> (town/local centre), 1 space per 350m <sup>2</sup> (out of centre)
Food retail (500 m <sup>2</sup> to 1000m <sup>2</sup> )	1 car space per 25m <sup>2</sup>	1 space per 125m <sup>2</sup> (town/local centre), 1 space per 350m <sup>2</sup> (out of centre)
Food retail (above 1000m <sup>2</sup> )	1 car space per 14m <sup>2</sup>	1 space per 125m <sup>2</sup> (town/local centre), 1 space per 350m <sup>2</sup> (out of centre)
Garden Centres	1 car space per 25 m <sup>2</sup>	1 space per 300m <sup>2</sup> (min 2 spaces)
Non-food retail (500m <sup>2</sup> or more)	1 car space per 25m <sup>2</sup>	1 space per 1500m <sup>2</sup> (out of centre) with minimum 4 spaces; 1 space per 300m <sup>2</sup> (town/local centre)
<b>Financial and professional services (Class E)</b>		
Banks, building societies, estate agents and other agencies, betting shops	1 car space per 30m <sup>2</sup>	Individual Assessment
<b>Food and drink (mainly on the premises) (Class E)</b>		
Restaurants, snack bars and cafés. For sale & consumption on the premises	1 car space per 6m <sup>2</sup> / No parking in Town Centre	1 space per 20 seats (minimum 2 spaces), town centre parking not necessarily required
<b>Public House, wine bar, drinking establishment (sui generis)</b>		
Public houses, wine bars or other drinking establishments but not nightclubs	Individual Assessment/ Justification/ No Parking in Town Centres	1 space per 100m <sup>2</sup> (minimum 2 spaces), town centre parking not necessarily required
<b>Hot Food Takeaways (sui generis)</b>		

For sale & consumption of hot food off the premises	1 car space per 6m <sup>2</sup> / No Parking in Town Centres	1 space per 50 m <sup>2</sup> (minimum 2 spaces), town centre parking not necessarily required
<b>Business (office, research and development and light industrial premises) (Class E)</b>		
Office, research & development, light industry appropriate in a residential area-threshold of 2,500m <sup>2</sup>	1 car parking space per 200sqm in town centre locations (within 400m of a bus stop providing a minimum of 4 buses per hour and located within 800m of a train station) and 1 space per 30sqm in all other areas.	1 space per 125m <sup>2</sup> (minimum 2 spaces) for office premises 1 space per 250m <sup>2</sup> (min 2 spaces) for research and development and light industrial premises
<b>B2 General Industrial</b>		
General industrial use	1 car space per 30m <sup>2</sup>	1 space per 500m <sup>2</sup> (minimum 2 spaces)
<b>B8 Storage/distribution (including open air storage)</b>		
Warehouse (storage)	1 car space per 100m <sup>2</sup> 1 lorry space per 200m <sup>2</sup>	1 space per 500m <sup>2</sup> (minimum 2 spaces)
Warehouse (Distribution) or Cash and Carry	1 car space per 70m <sup>2</sup> 1 lorry space per 200m <sup>2</sup>	
<b>C1 Hotels</b>		
Hotels, boarding and guest houses where no significant care is provided	1.5 car spaces per bedroom plus 1 coach space per 100 bedrooms OR individual assessment/justification	Individual Assessment
<b>C2 Residential Institutions</b>		
Extra Care	1 car space per 1 or 2 bed self-contained unit OR 0.5 per communal unit OR Individual assessment/justification	Individual Assessment
Hospital	1 car space per 4 staff plus 1 car space per 3 daily visitors OR Individual assessment/justification	Individual Assessment

Student Halls of Residence/Residential colleges	<b>Sustainable access zone</b>	<b>Proposed parking standard (maximum)</b>	Case-by-case assessment, linked to transport assessment/travel plan
	Sites ONLY within RHUL Sustainable Access Zone	Staff: 1 space per 2 staff Student: 1 space per 7 beds	
	Sites ONLY within Egham Station Sustainable Access Zone	Staff: 1 space per 2 staff Student: 1 space per 7 beds	
	Sites within RHUL AND Egham Station Sustainable Access Zones	Staff: 1 space per 2 staff Student: 1 space per 10 beds.	
	Sites OUTSIDE Sustainable Access Zones	Individual assessment, requiring robust justification of parking levels and sustainable access.	
The sustainable access zones referred to as part of this parking standard can be viewed at Appendix 4 of this SPD.			
Care Home/Nursing Home	1 car space per 2 residents OR individual assessment/justification		Individual assessment
Training centres	1 car space per 2 staff OR Individual assessment/justification		Individual Assessment
<b>C3 Dwelling houses</b>			
Family houses, up to 6 residents living as a single household, including households where care is provided	See separate table in Appendix 2		See separate table in Appendix 2
Sheltered/ Extra Care	1 car space per 1 or 2 bed self contained unit OR 0.5 per communal unit OR Individual assessment/justification		Individual Assessment
<b>Non-residential institutions (Class E/F.1/F.2)</b>			



Day Nurseries/Crèche (Class E)	0.75 car spaces per member of staff plus 0.2 spaces per child	1 space per 5 staff plus minimum 2 spaces
Doctor's practices (Class E)	1 car space per consulting room. Remaining spaces determined by individual assessment	1 space per 2 consulting rooms (minimum 2 spaces)
Dentist's practices (Class E)	1 car space per consulting room. Remaining spaces determined by individual assessment	1 space per 2 consulting rooms (minimum 2 spaces)
Veterinary practices (Class E)	1 car space per consulting room. Remaining spaces determined by individual assessment	1 space per 2 consulting rooms (minimum 2 spaces)
Libraries, museums and art galleries (Class F.1)	1 car space per 30m <sup>2</sup> OR individual assessment/justification	Individual Assessment
Public halls licensed for entertainment, unlicensed youth and community centres and Scout huts etc (Class F.2)	1 car space per 3 persons OR per 3 seats or per 20m <sup>2</sup> OR individual assessment/justification	Individual Assessment
Places of worship (Class F.1)	1 car space per 10 seats OR Individual assessment/justification	Individual Assessment
Schools/colleges/children's centres (Class F.1)	Case-by-case assessment, linked to transport assessment/travel plan	School Travel Plan required, to incorporate a site-specific cycle strategy
<b>Assembly and leisure and Other Uses (Class E/F.2/sui generis) will be subject to an Individual Assessment for both car and cycle parking</b>		

PLEASE NOTE that in addition to the above standards, parking spaces parking for disabled drivers needs to be fully considered when planning a development. For non-residential development, an additional 5% of total parking spaces should be allocated for disabled users or a minimum of 1 space per 750m<sup>2</sup> of gross floor area (whichever is the greater) to meet demand. More information about the required size and design of disabled car parking spaces can be viewed in paragraph 4.8 of this document.

## Appendix 2 – Parking Guidance for new residential development within use Class C3 (Family houses, up to 6 residents living as a single household, including households where care is provided)

Locational Characteristics† →	Town Centre‡ (Spaces per dwelling)	Suburban/ Village/Rural (Spaces per dwelling)	
Unit size ↓			
Studio Apartment*/1 Bed Home	1 space	1 space	
2 Bed Home	1 space	1 space	
3 Bed Home	1 space	2 spaces	
4+ Bed Home	1 space	≥ 2 spaces	

Notes to table:

\*A one-bedroom apartment/home and studio apartment are terms which are often used interchangeably, however there is a critical difference between the two. A studio apartment is a self-contained unit and houses everything in the single room space with exception of a bathroom. One-bedroom apartments feature separate spaces for the bedroom area, living room area and the kitchen area. Irrespective of the internal layout difference between these homes, parking standards applied for a 1 bed home will equally apply to a studio apartment.

† As set out at paragraph 4.11 of this SPD, the parking guidance set out in the table above expresses neither a maximum nor minimum standard for residential development. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. As such, in applying these standards, the accessibility to alternative sustainable modes of transport from a development site will be considered (including proximity to rail stations, and bus stops (combined with consideration of frequency of services in both cases)) as well as key services and facilities (as set out in the Council's Sustainable Places Part 2 report), and where necessary, this may support an increase or decrease in overall on site parking provision.

¥ Town centre boundaries are as defined on the Policies Map for the Local Plan. As a general point, in terms of requirements for cycle parking for residential schemes, for flats or houses without garages or gardens, a minimum of 1 cycle parking space should be provided for 1 and 2 bedroom units, and a minimum of 2 cycle parking spaces should be provided for units with 3 or more bedrooms. As a general point, proportionate, well integrated visitor parking is encouraged in residential schemes as appropriate

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### Appendix 3 – Electric Vehicle Charging Points Guidance (reproduced from the Surrey County Council Vehicular and Cycle Parking Guidance (November 2021))

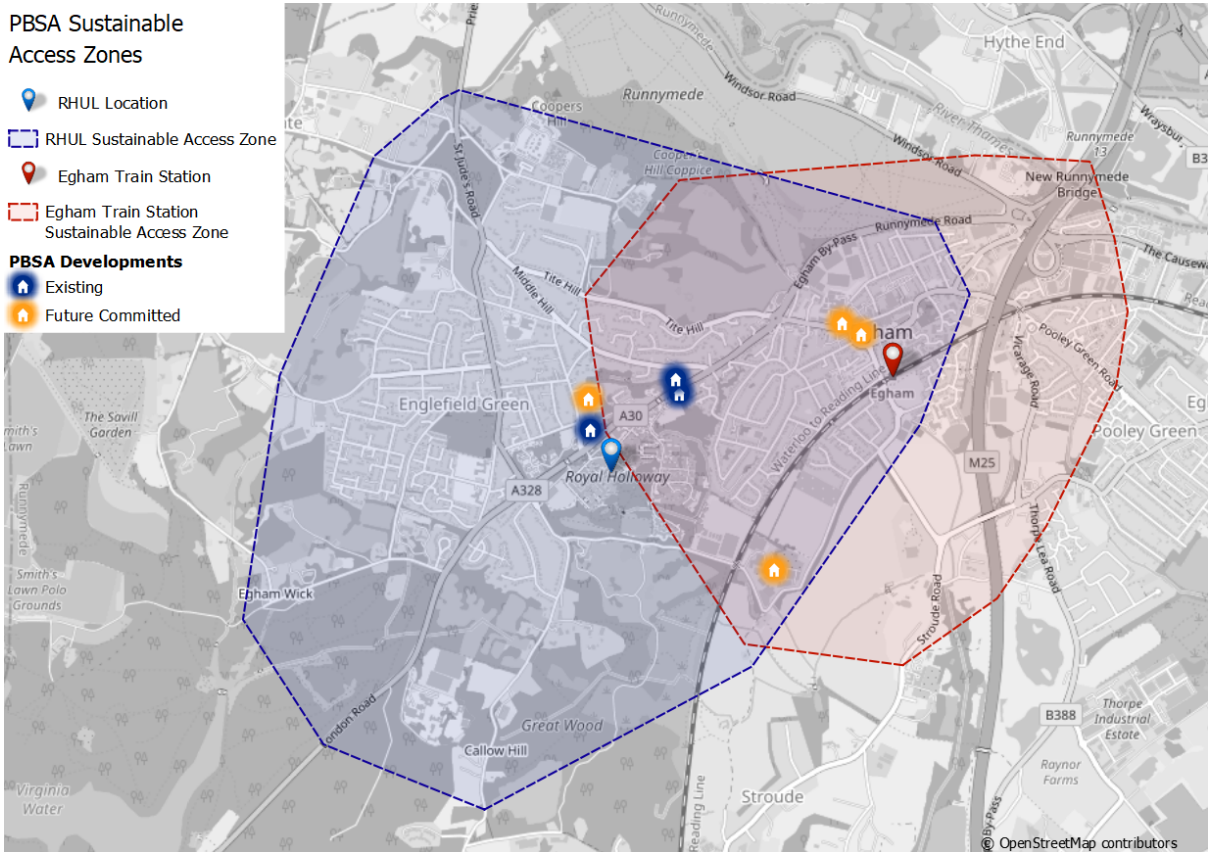
Residential Development	Minimum EV Charging Requirement	Charge Point Specification	Power Requirement
Houses	1 fast charge socket per house	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
Flats/Apartments	1 fast charge socket per flat (allocated and unallocated spaces).	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
C2 Care/Nursing Home C3 Elderly (Sheltered)	20% of available spaces to be fitted with a fast charge socket  A further <u>20%</u> of available spaces to be provided with power supply to provide additional fast charge socket	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
Commercial Development (Offices / Employment Retail / Leisure Uses)	EV Charging Requirement	Charge Point Specification	Power Requirement
E Offices, light Industry 500m <sup>2</sup> >; B2 General Industrial 500m <sup>2</sup> >; B8 Storage & Distribution 1000m <sup>2</sup> >; E Doctors/Dentists practices; F.1 Schools/Colleges; E Retail 500m <sup>2</sup> >; C1 Hotels; E/F.2/sui generis Sports Clubs, Health Clubs, Leisure Centres, Theatres, Cinemas, Conference Centres, 500m <sup>2</sup> >	20% of available spaces to be fitted with a fast charge socket  Plus  A further 20% of available spaces to be provided with power supply to provide additional fast charge socket	7kw Mode 3 with Type 2 Connector	230v AC 32 Amp Single Phase dedicated supply
		Feeder pillar or equivalent permitting future connection.	230v AC 32 Amp Single Phase dedicated supply
Sui Generis Uses	EV Charging Requirement	Charge Point Specification	Power Requirement

(Including all other uses not mentioned above)	Individual assessment/justification	Individual assessment/justification	To be determined by charge point specification
<b>High demand, short stay land uses</b>	<b>EV Charging Requirement</b>	<b>Charge Point Specification</b>	<b>Power Requirement</b>
(Development with high demand and short stay characteristics in strategic locations (e.g. motorway service stations, large petrol filling stations)  Large or major development and regeneration projects	20% of available spaces to be fitted with a fast charge socket.  A further 10% of available spaces to be provided with power supply to provide additional fast charge socket	7kw Mode 3 with Type 2 Connector  Feeder pillar or equivalent permitting future connection	230vAC 32 Amp Single Phase dedicated supply  230vAC 32 Amp Single Phase dedicated supply
	1 or more rapid charge sockets	50kw Mode 4 (DC) Multi-standard charge point	400v AC 100Amp Triple Phase dedicated supply

Note: Please refer to BEAMA Guide to Electric Vehicle Infrastructure (April 2015)<sup>7</sup> for guidance and further information on charging modes and connector types

<sup>7</sup> <https://www.beama.org.uk/resourceLibrary/beama-guide-to-electric-vehicle-infrastructure.html>

## Appendix 4 – Purpose Built Student Accommodation Sustainable Access Zone



**RUNNYMEDE BOROUGH COUNCIL**

**RUNNYMEDE PARKING GUIDANCE SUPPLEMENTARY PLANNING  
DOCUMENT (SPD)**

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

**REGULATION 12 STATEMENT OF CONSULTATION**

October 2022

- 1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 sets 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 the SPD
- 1.2 Regulation 12 also requires that for the purpose of seeking representations, copies of the Statement of Consultation must be made available with the SPD with details of:
  - i) The date by which representations must be made; and
  - ii) The address to which they must be sent.
- 1.3 This document is the Statement of Consultation for the Runnymede Parking Guidance SPD and sets out the persons the Council consulted in preparing the SPD and how their comments have been addressed.
- 1.4 A list of all those persons consulted on the Runnymede Parking Guidance SPD are set out in Appendix A.
- 1.5 The Council consulted with the three statutory bodies (Environment Agency, Historic England, Natural England) in preparing the SPD and their responses and how these were taken into account can be found in Appendix B. The Council also consulted the statutory bodies on a Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening and the responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the Runnymede Parking Guidance SPD (October 2022).
- 1.6 The Council held public consultation on a draft SPD for a period of 6 weeks from Friday 1<sup>st</sup> July to Friday 12<sup>th</sup> August 2022. 16 representations were received and a summary of these and how they were taken into account can be found in Appendix C.



## Appendix A - List of Persons Consulted on the draft Runnymede Parking Guidance SPD

As well as the persons listed below a further 118 individuals on the Planning Policy consultation database were consulted.

Neighbourhood Planning Services	Lichfields
Brooklands College	Stroude Residents Association
Chobham Parish Council	Savills
Ottershaw Village Hall	Forest Estate Community Hub
The Ottershaw Society	UK Power Networks
Runnymede Churches South	Surrey Heartlands CCG
Iain Vellacott Associates Ltd	Muse Developments
Surrey Community Action	Historic England London and South East Region
CBRE Ltd	ASC Finance for Business
Addlestone Community Centre	The Runnymede on Thames
Barton Willmore	Halogen UK
Dhammadakaya International Society Of The United Kingdom	JR Marine
Ottershaw Women's Institute	Thorpe Park (Merlin Entertainments Plc)
The Marine Management Organisation	Rainbow Day Nursery & Pre-School
Thames Water	Home Builders Federation
Co Plug	Calatec Ltd
Terence O'Rourke Ltd	Stellican Ltd
Addlestone Salvation Army	Jaspar Group
Youngs RPS	Adams Group Real Estate Ltd (on behalf of Tarmac)
Cameron Jones Planning	Fairhurst
Carter Jonas	Tarmac
Lyne Hill Nursery	Carter Planning Ltd
Anderhay	Addlestone Baptist Church
Hodders	Tetlow King Planning
Turley	The Planning Bureau Ltd
WYG	John Andrews Associates
North West Surrey Valuing People Group	Sheila Wright Planning Ltd.
Richborough Estates	SETPLAN
Blue Cedar Homes	Strutt & Parker
Vanbrugh Land	Urban Green Developments
NK Homes	DHA Planning
Surrey Wildlife Trust	Reside Developments
Planning Potential Limited	Ashill Group
JSA Architects	Woolf Bond Planning
Berkeley Homes	SSA Planning
Stride Treglown Ltd	Shanly Homes
West Addlestone Residents Association	Andrew Black Consulting

Union4 Planning	DPDS Consulting
DevPlan	Pegasus Planning
Paul Dickinson and Associates	IQ Planning Consultants
Rickett Architects	Englefield Green Village Residents Association
Runnymede Christian Fellowship	The Emerson Group
Montagu Evans LLP	Grosvenor Capital
Plainview Planning Ltd	Iceni
JP Electrical Ltd	Vail Williams LLP
Woking Borough Council	PRP
Revera Limited	Aston Mead Land & Planning
Devine Homes	Heatons
DP9 Ltd	Pegasus Group
Chertsey Museum	Quod
ST Modwen	AR Planning
Armstrong Rigg Planning	Sanders Laing
Optimis Consulting	Gladman Developments Ltd
Kinwell Property Investments Ltd	LRG
MSC Group Ltd	New Haw Residents Association
Kevin Scott Consultancy	Allied Telesis
R Clarke Planning Ltd	Glanville Consultants
Hallam Land	Avison Young obo National Grid
Meadowcroft Community Infant School	TASIS The American School in England
The Chertsey Society	Meath School
BLARA, BENRA, RRA & RAR	Philip Southcote School
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	The Kings Church
The Ramblers	Ottershaw and West Addlestone Residents Association (OWAIRA)
The Georgian Group	The Gardens Trust
Virginia Water Community Association	Turn2us
Friends families and travellers	Chertsey South Residents Association
Wentworth Residents Association	Franklands Drive Residents Association
Stonehill Crescent Residents Association Limited Company	The Twentieth Century Society
Egham Residents' Association	Virginia Water Neighbourhood Forum
Runnymede Art Society	Thorpe Village Hall
Woburn Hill Action Group	Addlestone Historical Society
RSPB England	Woodham Park Way Association
Christian Science Society Egham	Runnymede Dementia Action Alliance
Environment Agency	United Church of Egham
Penton Park Residents Association	Kennedy Memorial Trust

CMA Planning	CPRE Surrey
Theatres Trust	Woodland Trust
Thorpe Ward Residents' Association	Chertsey Good Neighbours
Runnymede Council Residents' Association	Chobham Commons Preservation Committee
Laleham Reach Residents' Association	Hants County Council
St. Paul's Church	Office of Road and Rail
WSPA	Enterprise M3 LEP
Voluntary Support North Surrey	Slough Borough Council
Spelthorne Borough Council	South East Coast Ambulance Service NHS Foundation Trust
Royal Borough of Windsor and Maidenhead	North Surrey Campaign To Protect Real Ale
Surrey County Council	International Community Church
Guildford Borough Council	Egham Women's Institute
Wokingham Borough Council	Sport England
Waverley Borough Council	Imperial College
Bracknell Forest Council	Transport for London
Tandridge District Council	Natural England
Rushmoor Borough Council	Free Schools Capital Education and Skills Funding Agency
London Borough of Hillingdon	Homes England
Mayor of London/London Plan team	Civil Aviation Authority
Elmbridge Borough Council	Ashford & St. Peter's Hospital NHS Foundation Trust
Bigbury Neighbourhood Plan Steering Group	Highways England
Windlesham Parish Council	Affinity Water
Wraysbury Parish Council	Brett Aggregates
Newlands Developments	Bellway Homes
The Oxygen Group	Danescroft
Kitewood	Abri
Bluestone Planning	Sovereign Housing Association
NHS Estates	Redrow Homes
Grade Planning	Network Rail
Surrey and Borders Partnership NHS Foundation Trust	ACS School, Egham
Thorpe Church of England primary School	Pycroft Grange School
Manorcroft Primary School	Darley Dene School
St Johns Beaumont	St Ann's Heath Junior School
St Judes C of E Junior School	New Haw Community Junior School
Ongar Place Primary School	Royal Holloway University of London
St Cuthbert's Catholic Primary School	Department for Education
Ottershaw C of E Junior School	Hythe Community Primary School
St Anne's Catholic Primary School	Lyne and Longcross CofE Primary School
Bishopsgate Primary School	Thorpe Lea Primary School
St Paul's C of E Primary School	Sayes Court School
Stepgates Community School	The Holy Family Catholic Primary School

West End Parish Council	Bisley Parish Council
North West Surrey Alliance	Epsom and Ewell Borough Council
London Borough of Richmond Upon Thames	Hart District Council
London Borough of Hounslow	Surrey Police
Mole Valley District Council	Frimley Clinical Commissioning Group
Reigate and Banstead Borough Council	Buckinghamshire Council
Surrey Heath Borough Council	London Borough of Kingston Upon Thames
City Planning	CDS Planning
Beacon Church	Basingstoke Canal Society
Surrey Scouts	Thorpe Neighbourhood Forum
Englefield Green Village Centre	Lyne Village Hall
St John's Church Egham	Longcross North Residents Association
Surrey Muslim Centre	Otthershaw Neighbourhood Forum
Disability Empowerment Network Surrey	Runnymede Foodbank
Runnymede & Weybridge Enterprise Forum	Egham Chamber of Commerce
Runnymede Muslim Society	Lyne Residents' Association
St Paul's Church Egham Hythe	Runnymede Deanery
Just a helping hand	Surrey Positive Behaviour Support Network
New Haw Community Centre	Hamm Court Residents Association
National Trust	Englefield Green Neighbourhood Forum
All Saints New Haw	Arup
Surrey Minority Ethnic Forum	The Victorian Society
Hythe Community Church	Community Life
Egham Museum	Brox Road Action Group
Chertsey Chamber of Commerce	398 Air Cadets
Surrey Chamber of Commerce	Staines and District Synagogue

**Appendix B - Consultation Responses received during the preparation of the Runnymede Parking Guidance SPD and how these were Addressed (specifically through consultation on the HRA/SEA screening document)**

<b>Persons</b>	<b>Summary of Main Issues</b>	<b>How Addressed</b>
Environment Agency (EA)	No comment	No action required
Historic England (HE)	In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in paragraph 1.42 of the Screening Statement (Runnymede Borough Council, 1 <sup>st</sup> June 2022).	No action required
Natural England (NE)	The topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments	Noted. No changes required.

- 1.7 The draft Parking Guidance SPD was also shared with Surrey County Council’s Runnymede Joint Committee for comment in January 2021. A summary of the comments made by the Joint Committee are set out in the table below with a response provided to each to confirm where the comment had been addressed in the June 2022 version of the draft SPD (which was subsequently approved at the 22<sup>nd</sup> June 2022 Planning Committee for public consultation).

<b>Summary of comments made by the Runnymede Joint Committee</b>	<b>Where addressed in draft SPD</b>
Elmbridge Borough Council have recently updated their Parking Standards and are now requiring parking spaces to be 5 m x 2.5 m, rather than the previous national standard of 4.8 m x 2.4 m. I don’t know if this has been considered by Runnymede?	Paragraphs 3.12 to 3.14 sets out the minimum size of parking spaces required, both inside and outside garages/car ports. The minimum size of a parking space is confirmed to be 2.5m x 5.0m.
Under section 3.16 – Travel Plans, it might be useful to reference that Runnymede will update the SPD in the same way as has been done for Electric Vehicle charging provision	This point has been addressed in paragraph 3.20.

<p>e.g.: <i>Should any updated guidance be adopted by the County Council on School Travel Plans following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.</i></p>	
<p>I don't know if you want to consider "no car" or "car free" developments at all, there are areas within Runnymede where they may be justified, but there doesn't seem to be any mention of them within the draft SPD.</p>	<p>This point has been addressed in paragraph 3.15 of the SPD.</p>
<p>I note that section 3.10 states: "In following Surrey County Council's approach, the parking guidance included in this SPD expresses neither a maximum nor minimum standard." To clarify, Surrey County Council does recommend maximum parking standards.</p>	<p>Paragraph 3.10 of the SPD has been amended accordingly to address this point.</p>
<p>I think it is worth raising the possibility of the risks associated with securing new CPZs and funding for these via the planning system. That is, there is no guarantee that there will be sufficient funds forthcoming over the years to allow for CPZs to be free-for-use (or at reduced cost) for residents. We can't be certain there will be sufficient development within the localities of Egham and Englefield Green to fund these. This means that there is the chance that residents may need to pay for their permits so that Runnymede BC or Surrey CC do not end up funding the schemes in perpetuity.</p>	<p>This is addressed in paragraph 3.5 of the SPD.</p>

## Appendix C - Summary of Representations to the draft Runnymede Parking Guidance SPD and the Council's Response

Name	Response	Comment	Amend SPD?
Private individual	<p>1. Document states, 'For both residential and non-residential developments, the minimum dimension of a &gt; car parking space should be 2.5m x 5.0m'.</p> <p>This seems to be based on the size of "a large modern car". It seems a poor use of space to require every space to be large enough for the largest cars for 2 reasons.</p> <p>a. If half the cars are actually smaller than that and you size half the spaces available on that basis, you will be able to accommodate more cars.</p> <p>b. Many people have larger cars than they need which imposes a cost on the rest of society - for instance in having to reduce the number of car spaces available. If we introduce incentives to have smaller cars like having the ability to find a car parking space big enough more easily, we will change the cost benefit analysis on size of cars and encourage a virtuous cycle towards smaller cars instead of the current arms race towards larger ones.</p> <p>Large cars tend to be heavier and thus cause more damage in car accidents. Moving towards smaller cars would make the roads safer and give us more space. Looking at <a href="https://www.parking-garage.com/en/car-park-dimensions-garage-width-lengthheight/">https://www.parking-garage.com/en/car-park-dimensions-garage-width-lengthheight/</a> they mention standard dimensions for "European" or "U.S. Compact" as being 2,44 meters * 4,88 meters. So, I see those as an absolute maximum "minimum" size. I suspect that is a U.S. centric measurement where "European" probably means even medium size / large size cars in Europe so I imagine even smaller dimensions actually make sense. Regardless, I think the introduction of "compact" car parking spaces would send a strong and highly desirable message.</p>	<p>1. It is not considered to be the place of the Parking SPD to try and limit the size of cars that people purchase. The size of parking space recommended is based on discussions with Surrey County Council and seeks to accommodate the size of many modern cars which are offered on the market.</p> <p>2. These comments are not relevant to the contents of the Runnymede Parking Guidance SPD. Representor contacted and comments passed to Surrey County Council for response.</p> <p>3. These comments are not relevant to the contents of the Runnymede Parking Guidance SPD. Representor contacted and comments passed to Surrey County Council for response.</p>	No

	<p>2. Bicycle path provision: I was excited a few years ago to hear that there was going to be a new cycle lane between Staines Bridge and the M25 towards Egham. As there was an existing rather pathetic path, I fondly imagined it would be something useful. Instead it was clearly designed without any input from actual cyclists (or it was ignored if provided). Unlike driving a car, stopping and starting a bicycle is expensive for cyclists, both in lost momentum and cognitive load in having to scan for dangers at each crossing. There must be about 10 different places on the so called cycle path where bicycles have to yield to infrequent traffic turning where traffic on the main road can just carry on regardless. In addition, bikes have to bounce down onto roads and up the other side - again unconsciously sending the message that cars have priority even when they are rarer. Even worse, it is shared with pedestrians - which makes the walking experience more deeply unpleasant as they have to watch out for bicycles, potentially coming up from behind and giving them a nasty shock. For these reasons - and completely in line with law, I choose to use the road rather than the pavement/"cycle" lane - which I think is best all round. However, for less confident cyclists who we want to encourage, both options are dismal at best. I hope that future cycle paths will take into account research on best practices and design better.</p> <p>3. Pedestrian / cycling signalling often seems to be deliberately aimed to discourage walking/cycling. The pedestrian crossing for the A30 at the Maranello roundabout is particularly awful. You will ALWAYS have to wait several minutes before the lights go green. Given that the nearest junctions are a long way away and that they often go green just as traffic intensifies there is zero good reason for this. I cannot understand any reason why they shouldn't go green immediately. Similarly, the pedestrian/bicycle crossing lights at the Burger King roundabout across the A30 will be red even if cars are stopped and remain stopped for some considerable time. Why can't they be synchronized with those lights and be green when it is safe to cross?</p>		
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<p>Private individual</p>	<p>1. It is a great shame that the Car Ownership data in section 2 is over 10 years out of date. Basing anything on this data is fundamentally flawed. Some projection needs to be made to estimate the current situation and I would suggest taking the percentage increase between 2001 and 2011 and applying the same percentage increase to the 2011 figures. Then for the purposes of planning for the next 10 years I would suggest adding that same percentage again. This would mean 35,000 cars/vans total and well over 15,000 households with two or more cars/vans – Notably 3,300 with three and almost 1,500 with four.</p> <p>2. I do not believe that car ownership will decrease over the next ten years, nor that there will be any major switch to other transport modes. Having said that, users of other transport modes by preference will I believe that keep their cars for journeys where other modes are not practical/possible. In other words, any switching to other modes will not reduce car numbers, just car journeys. Equally, sometimes a car journey is necessary to travel to the access point for other transport modes, for example getting to the station.</p> <p>3. Which brings me on to the fact that parking at local stations is also totally inadequate. For example Addlestone which has none and Byfleet &amp; New Haw which has almost none.</p> <p>4. Locally it is abundantly clear that there is far from sufficient parking for current needs. For example, many houses around our area of Addlestone have no driveway but are home to 2 or more cars, hence the streets are hugely congested due to parked cars. The cars are often dangerously and/or illegally parked – for example fully or partly on the path, too near to junctions, blocking dropped curbs, blocking driveways, etc. This parking causes traffic issues, problems for the emergency services, problems for wheelchair users and people pushing prams/ push-chairs and danger to pedestrians. The problem has become noticeably much worse over the last 10 years.</p>	<p>1. This section of the report has been updated using Department for Transport (DfT) data on licenced vehicles. Data from the National Trip End Model (NTEM) has also been interrogated to understand likely future trends in car ownership.</p> <p>2. Comments noted. As referred to in response to comment 1 above, report now contains text on predicted future trends in car ownership.</p> <p>3. Comments about station parking are noted. The Parking SPD cannot address existing parking situations in the Borough unless a planning application is submitted for the extension of a car parking area associated with a particular use. Whilst the SPD does not contain a specific standard for an extension to a station carpark, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public</p>	<p>1. Yes</p>
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	<p>It is important to note that Runnymede and Surrey have a much greater percentage of households with multiple cars than the national picture. This will remain true due to the relative affluence of the area and the increasing number of grown-up 'children' who cannot afford to move to their own property because of the very high cost of renting or buying.</p> <p>5. Appendix 1: A visit to any industrial/warehouse or office blocks estate is all that's needed to see that current parking provision is totally inadequate and causes overspill parking into neighbouring residential areas.</p> <p>6. Pass any school (outside school run times) and you will see huge numbers of cars lining local roads due to inadequate on-site parking for staff (&amp; pupils). Churches tend to have grossly insufficient parking, again causing huge number of cars parking on local roads during services, which can be an issue especially in the case of weekday services.</p> <p>7. Appendix 2: Where flats have been built using these guidelines the 'visitors' spaces are always full, probably mostly used by residents. Equally, surrounding roads are choked with the overspill parking. As another example, the car park at Crouch Oak Surgery, Addlestone also gets choked with overspill parking from nearby flats. Many 2 bedroom flats have 2 or 3 people living there and 2 cars. Many 3 and 4 bedroom houses have 3, 4 or 5 people living there and up to 4 cars.</p>	<p>transport to the station in deciding on the level of parking required.</p> <p>4. Comments regarding nuisance parking should be reported to Surrey County Council. The SCC website provides more information at: <a href="http://www.surreycc.gov.uk/highway-issues">Highway issue - What is the issue? - Surrey County Council (surreycc.gov.uk)</a>.</p> <p>Whilst comments are made about existing parking being inadequate locally, this SPD is unable to address existing parking situations in established developments. The SPD will be used to assess the suitability of parking levels where new development is proposed, or extensions to existing parking arrangements.</p> <p>The Council considers that the standards contained within the SPD are appropriate to ensure a suitable amount of parking provision for a range of different types of new development moving forwards. In response to the comment regarding households owning multiple cars, residential standards in the Parking SPD are expressed as neither maximum nor minimum standards. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.</p>	
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		<p>parking was acceptable. For new places of worship and schools, the SPD sets out that the maximum vehicular parking standard is 1 car space per 10 seats OR Individual assessment/justification. For schools, an individual assessment is also required linked to a transport assessment/travel plan. This would allow a bespoke car parking scheme to be developed, tailored to the specifics of a proposal.</p> <p>7. It is the responsibility of the landowner/managing agent of such schemes to police who parks in the visitor spaces within a development. This type of issue goes beyond the scope of the Parking SPD. Please refer to response to comment 4 above in relation to comments made about the adequacy of parking in existing residential development, and also the suitability of the parking standards for new residential developments.</p>	
Private individual	<p>Parking is a problem all over the borough. I have often wondered why the ground by the station which was supposed to be for new housing, but couldn't (I believe because of the underground river) wasn't made into a car park for the station. This would help the borough as many commuters park in the side roads, making it difficult for family, health visitors for the elderly etc. to find parking.</p>	<p>It is unclear which station is being referred to in this letter and as such, it is difficult to provide specific comments in response.</p> <p>Whilst the SPD does not contain a specific standard for an extension to a station car park, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would</p>	No

		propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public transport to the station in deciding on the level of parking required.	
Private individual	<p>1. I think any policy needs to reflect the reality that cars are here to stay, be they electric or otherwise.</p> <p>2. Building more electric points for the future will be essential.</p> <p>3. Reducing the proportion of parking spaces is hugely short sighted. People in the borough live and work in such a wide variety of places that using public transport will never be a large part of the solution (taking 2 hours to complete a journey that may take 45 mins each way is never going to be an option). Unfortunately our weather and time pressures will never make cycling more than a minority contribution. The only option is to encourage people never to leave their homes and that does not feel right.</p> <p>Parents with children often need to do one or two stops in different directions before they even arrive at work on time. Then they often need to travel to after school sports activities, we want our children to breath clean air but we also recognise the need for them to be active and healthy. Children of different ages have different requirements but at a young age they cannot go on buses alone and the chances of it being only one bus is unlikely. Food shopping, Drs appointments, sports clubs, any leisure pursuit without a car is a massive challenge, not everything can be done on zoom!</p>	<p>1. Comments noted. The SPD has been updated to include additional information on likely future trends in car ownership in the Borough. Based on past ownership trends, this shows a projected steady increase in car ownership up to 2031.</p> <p>2. The Parking SPD sets out the electric vehicle charging requirements for various types of development, along with charge point specifications and power requirements for the Borough in line with current guidance published by Surrey County Council. This builds upon the requirement in policy SD7 of the Local Plan which sets out that, <i>'Development proposals will be supported where they, subject to feasibility, incorporate electrical vehicle charging points in accordance with guidance issued by Surrey County Council'</i>.</p> <p>3. The vehicular parking standards recommended in the Runnymede Parking SPD are, in the majority, based</p>	No

	<p>If future developments do not address the real need for a good amount of parking provision when planning then overspill onto the streets will become an even bigger problem than it is now. Increased parking spaces make a town thrive. If you reduce a town's parking provision it will die. It may be unfair but can all of you involved in this project spend one month where your whole family uses exclusively public transport or bicycles to get around and keep a diary to show the rest of us how this will really work.</p>	<p>on the standards recommended by Surrey County Council, in their capacity as the Highway Authority, and as taken from their Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (November 2021). It is recognised that the availability of car parking has a major influence on the means of transport people choose for their journeys. It is therefore essential to try and get the balance right, by providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability. The Parking SPD seeks to strike this balance and also respond to the policies within Surrey County Council's recently adopted Local Transport Plan 4 which seeks to support behaviour change through the Avoid, Shift and Improve principle:</p> <ul style="list-style-type: none"> <li>▪ <b>Avoid</b> unnecessary petrol car use by reducing the number and length of trips needed by improving land use planning, travel planning and levels of digital connectivity.</li> <li>▪ <b>Shift</b> travel to more sustainable modes: public transport, walking, and cycling, away from car use.</li> <li>▪ <b>Improve</b> emissions intensity and energy efficiency of vehicles and operational efficiency of roads through technology improvements.</li> </ul> <p>Many non-residential uses are proposed to be supported by an individual</p>	
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		<p>assessment in the SPD to allow bespoke car parking schemes to be proposed, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public transport to their destination in deciding on the level of parking required.</p> <p>Residential standards in the Parking SPD are expressed as neither maximum nor minimum standards. This is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.</p> <p>In relation to town centre parking, at the outset, it should be noted that the SPD does not propose to alter the amount of parking available in existing town car parks, or through existing on street parking arrangements. The guidance within the SPD is only applicable to new developments coming forward in town centre locations.</p> <p>The recommended standards for new developments are considered appropriate as the Borough's town centres generally offer sustainable</p>	
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		travel alternatives to trips by private car. This means that there are more opportunities within and near the Borough's town centres for active and sustainable travel, and less need to provide equivalent levels of car parking as part of new development (both residential and non-residential uses) within a town centre location.	
Private individual	<p>1. I am concerned that at a time when National Highways (Formally Highways England) is starting work that will increase traffic flow through the junction of the M25 and A3, and Surrey County Council is due to begin work on increasing capacity for traffic on the A320, both of which are likely to encourage greater private vehicle use, that Runnymede Borough Council is reducing the amount of on-street parking space available in the area.</p> <p>2. I have seen more than one new set of yellow lines put in on Princess Mary's Estate in Addlestone and as far as I can judge, this explains the increased parking on the High Street, thereby reducing traffic flow along that road. Local opinion suggests that the explanation for repeatedly adding more yellow lines to Princess Mary's Estate appears to be that residents there believe they have exclusive rights to park on those roads. To the best of my knowledge, the estate is not private, its roads are public and therefore the residents have to accept that other road users will park there. I am also aware of a fallacious argument among some people that it is commuters who cause the parking problem. While there may be some truth to this, it is difficult to believe that those commuters are "commuting" from Addlestone to anywhere else since the train service from Addlestone does not lend itself to such behaviour. Therefore, these people are presumably commuting into Addlestone in order to work in the town, and so to make their experience here more difficult makes little sense.</p> <p>3. At a time when local shops are struggling and we need to ensure people can get here so that they can work in the town,</p>	<p>1/3. The SPD does not propose to reduce the amount of existing on street parking provision in the Borough. The guidance within the SPD is only applicable to new developments coming forward in the Borough, setting out the recommended parking standards for both vehicles and bicycles for various types of development.</p> <p>In terms of future proposals to improve public transport, Surrey County Council has recently adopted Local Transport Plan 4 which seeks to support behaviour change through awareness campaigns and other activities to encourage walking, cycling and use of public transport and zero emission vehicles (ZEVs). An ongoing programme of activities to make residents and businesses aware of opportunities to change behaviour, how to do so, and the benefits, is recognised to be essential to make sure that enough people travel differently, at least some of the time.</p> <p>Through their public and shared transport policy in LTP4, Surrey County Council also propose to provide high-</p>	No



	<p>taking away parking in the town centre simply pushes the problem further out, thereby making the experience for people visiting and working the town less enticing, while making it far more arduous for people living here.</p> <p>If this problem is looked at as a mathematical equation, it simply does not add up. At what point does the council turn this around and either discourage road development that increases traffic flow or accept that there is a need for maintaining, if not increasing, the provision of on-street parking? Perhaps there is a need to improve public transport, but speaking as someone who came to Addlestone from London over thirty years ago, I did not understand the public bus network here at that time. I believe therefore, that new residents to the town, many of whom I am informed come from London, may be of a similar opinion to me when I came here; that they don't understand or trust the public transport system here sufficiently to rely upon it. The only thing I did understand is why the old Peterbus service was stopped, which is because I never understood whether it was a public bus, or simply for use by people going to and from the hospital.</p>	<p>quality, reliable, affordable, and joined up public, shared and demand responsive transport, supported by accessible and easy to use travel information and booking systems, with the aim of shifting travel to more sustainable modes: public transport, walking, and cycling, away from car use.</p> <p>More information about Local Transport Plan 4 can be found at: <a href="https://surreycc.gov.uk">Local Transport Plan (LTP4) - Surrey County Council (surreycc.gov.uk)</a></p> <p>2. Comments noted regarding the Princess Mary's Estate, however these comments go beyond the scope of the Parking SPD given that this is an established residential area. The guidance contained in the SPD would only apply to new developments, although this could include individual home owners within the estate who may wish to increase their own private parking area within their curtilage where such a proposal would require planning permission.</p>	
Transport for London	<p>We have no specific comments to make on the draft SPD we draw your attention to London Plan parking standards set out in Policies T6 – T6.5  <a href="https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf">https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</a></p>	<p>The parking standards for the London Plan have been reviewed but are not considered locally relevant to Runnymede Borough.</p>	No
Egham Residents Association	<p>1-The Egham Residents' Association wishes to begin its response to this draft SPD by congratulating the council on the broad thrust and much of the detail of it.</p> <p>2-The evidence that catastrophe awaits us unless we act to arrest climate change grows stronger every day, and this draft</p>	<p>1-Support welcomed.  2-Comments noted.  3-Comments noted.  4-Support welcomed.  5-The parking survey work undertaken supports that it is most likely that the on-street parking pressures in the Egham</p>	

	<p>SPD is a welcome contribution to the arsenal of measures that will be necessary.</p> <p>3-The required change will not come without pain and inconvenience. A great shift over not many years from maximalist to minimalist parking provision in planning policy - and no provision at all in some locations, including town centres - has shocked some people, and care needs to be taken in the pace of implementation. But in the final analysis the roars of protest from people who still want to drive and park cars in traditional ways have to be largely ignored.</p> <p>Awareness of the seriousness of climate change has increased massively in the course of this century, yet vehicle ownership in Runnymede has grown slightly over the past 20 years - contributing to the fact that 46pc of carbon emissions in Surrey are generated by transport. We cannot continue like this.</p> <p>Specific points:</p> <p><u>4-Section 3: Parking guidance for Runnymede, Non-residential development, paragraph 3.2:</u> We welcome the recognition here that “many non-residential uses do not require car parking to be provided” and the statement that “in line with Surrey County Council’s approach, the car parking standards for non-residential uses set out on this guidance are expressed as maximums in order to encourage travel to destinations by means other than the private car and to prevent excessive car parking provision at those destinations”. We also accept of course (How could we not?) that town centres are best suited for putting the ‘new’ thinking into practice.</p> <p><u>5-Paragraphs 3.3 and 3.4</u> We applaud the implicit recognition in 3.3 that Royal Holloway is an “essentially commercial entity” and the further recognition in 3.4 that College-related parking has exacerbated parking problems in nearby streets in Egham and Englefield Green.</p>	<p>and Englefield Green areas are generated by non-residential demand given the heightened demand for on street parking during the day time surveys (para 3.2.12 of Project Centre report). Para 4.1.5 of Project Centre’s report further suggests that these pressures could be caused by students who are travelling to the University from areas that have limited alternative travel options rather than students living in nearby PBSA.</p> <p>6-The Parking Team at Surrey County Council was contacted for an update. A response has been received and this has been passed on to Egham Residents Association.</p> <p>7-Support for approach welcomed.</p> <p>8-Support for approach welcomed.</p> <p>9-Support for standards welcomed. In relation to the proposed standard for 4+ bedroom dwellings, this has been reduced to 2 parking spaces in line with the recommendation in the Surrey Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development guidance (November 2021), albeit it, in line with the other residential parking standards contained in the SPD, this will be applied flexibly to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. This proposed approach is considered to be largely in line with SCC’s approach, given that ‘note 1’,</p>	
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	<p>But we are somewhat baffled by the last sentence's stating: "The survey results found that high levels of on street parking were being exacerbated by non-residential demand including people commuting to the area during the day time, potentially including those travelling to the University, rather than from the Purpose Built Student Accommodation". Is this really saying that students living in PBSA and parking their cars in the streets of Egham and Englefield Green aren't causing much of a problem?</p> <p><u>6-Paragraph 3.5</u> This paragraph gives us an opportunity to re-emphasise that we believe many people in the part of Egham to the west of Station Road and north of the railway line would welcome the introduction of a CPZ and that they are fed up with the lack of progress on this matter.</p> <p><u>7-Residential development, Paragraph 3.10</u> We welcome the fact that the draft SPD proposes neither a maximum nor minimum parking standard for residential development. This flexibility seems sensible.</p> <p><u>8-Car free developments. Paragraph 3.15</u> We accept that there can be a case for this in town centres - and we are indeed already becoming used to it. We welcome what is said in the draft SPD about cycle parking, electric vehicle charging points and car clubs.</p> <p><u>9-Proposed car parking standards</u> Overall, these seem very reasonable. We like the proposal that there should be no parking provision for hot food takeaways in town centres. We also approve of the proposed parking standards for student halls of residence/residential colleges. We agree too with the parking guidance for new residential development within use class 3 - with the exception of the suggestion that there should be 3 spaces for 4-bedroom homes; this seems excessive and contrary to the body and spirit of the draft SPD.</p>	<p>which is applied to the 4+ bedroom standard and many of their other recommended residential parking standards states that, 'Where space permits, it may be appropriate to consider increased provision'. This would indicate that SCC also believes that a degree of flexibility is important in applying their recommended standards.</p>	
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<p>Englefield Green Village Residents Association (EGVRA)</p>	<p>Comments made relate to student parking.  <u>Comments on the report produced by Project Centre Ltd</u>  1. From the census data, the further away from RHUL a student lives, the more likely he/she is to have a car. The conclusion from this is that the primary reason that students have cars is to travel to RHUL for study. Based on this conclusion, and the lower student/ car ratio nearer the university, it is then argued that PBSA's are unlikely to have an impact on street parking. (5.1.1).  No survey has been carried out of why students have cars. Whilst obviously those who live far away and have no other means of transport need a car to get to the university, there is not the evidence to demonstrate that this is the primary reason. It is our view, supported by anecdotal evidence, that the primary reason that a student owns a car is for pleasure and socialising.  The other factor that has not been taken into account is the number of foreign, primarily Chinese, students at RHUL. These student numbers are significant and come from well off families, (otherwise they would not be able to afford the fees). It is known that some have expensive cars and yet live on the Campus.  2-The survey of parking in RHUL seems to indicate that there are spaces available during the day. This is not the case. Again, anecdotal evidence from a number of those that work at RHUL and have to find a car space indicate that there are generally no spaces left after 9am on an average working day. The argument that a student who lives a distance away from the University can find a space when coming to a lecture or other activity (even if they have a pass, to which we understand they have a right if they live more than 1.5 miles from RHUL) is not correct (5.1.4 indicates RHUL travel plan 'provides parking for those who cannot find an alternative' is not correct in two respects a) because there are no spaces even if you have a pass and arrive after 9am and b) because the passes are restricted to those who live more than 1.5m away).  3-The survey indicates that some Englefield Green streets, close to the PBSAs, are saturated with parked cars most of the time. Thus, if a student in a PBSA has a car, and the very few</p>	<p>1-Comments noted. Surveying students to find out why they own cars could be interesting in seeking to better understand the reasons as part of a wider strategy to change behaviours. However, this goes beyond the evidence that was felt to be required in order to determine what the source(s) of on street parking pressures in Englefield Green and Egham are and to determine an appropriate parking standard for Purpose Built Student Accommodation.</p> <p>In relation to wider strategy to support behaviour change, Surrey County Council adopted Local Plan Transport Plan 4 (LTP4) in July 2022. LTP4 contains a specific policy on this matter and is based on the Avoid, Shift and Improve principles set out as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>Avoid</b> unnecessary petrol car use by reducing the number and length of trips needed by improving land use planning, travel planning and levels of digital connectivity.</li> <li>▪ <b>Shift</b> travel to more sustainable modes: public transport, walking, and cycling, away from car use.</li> <li>▪ <b>Improve</b> emissions intensity and energy efficiency of vehicles and operational efficiency of roads through technology improvements.</li> </ul> <p>Extensive campaigns are proposed to encourage and support the change to influence different sectors of the</p>	<p>No</p>
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	<p>spaces at the PBSA are taken, he will take a remaining street space if he can. This has a significant and disproportionate effect on residents parking. There would be little effect of one or two extra cars if there was plenty of street parking. But in the case of many of the streets of Englefield Green, residents are already finding difficulty finding a space, and the addition of even one or two extra cars significantly impacts on resident parking.</p> <p>4-The survey of other universities and the number of spaces allocated per PBSA in other locations is irrelevant as it does not reflect the circumstances here at RHUL. Why would Guildford specify a number, yet Woking has no specification? Obviously because their circumstances are different. Here in Englefield Green, we have a Victorian village (population 10,000 residents) with narrow streets bang up against a 10000 student university with plans to expand in the future to 15000. This is not comparable with Guildford or Woking.</p> <p>5-The sum of these points seem to us to indicate that the statement made in 5.1.1 that 'PBSA's are unlikely to have an impact on street parking' (in Englefield Green) is incorrect, and more likely to reflect a need to justify small numbers of parking spaces for students at PBSA's rather than the actual facts would indicate.</p> <p><u>Content of Supplementary Planning Document</u></p> <p>6-We totally agree with the need for a CZP. Despite the protestations from some parts of the community regarding extra charges, we think this is the only solution. We need to 'defend' the rights of residents to park outside or near their homes, and I'm afraid this is the only sensible way. However, given that we are at a time of increasing hardship, we feel that any charges for such a scheme should be kept to a minimum or at a subsidised rate for the first couple of years until its effectiveness is demonstrated and (hopefully) the current economic crisis is over.</p> <p>7-We disagree with the proposed number of parking spaces allocated to students in PBSA's. The points raised above indicate that there are very special circumstances in EG for</p>	<p>community. It is also proposed to use technology (such as smartphone apps) and incentives to help change behaviours. The policy can be viewed in full at: <a href="http://surreycc.gov.uk">Supporting behaviour change policy area - Surrey County Council (surreycc.gov.uk)</a></p> <p>Additionally, the RHUL Travel Plan aims to help/influence a change in travel behaviours to and from the university with a focus to reduce car use and increase active travel where practicable and feasible.</p> <p>2- To confirm, a parking survey was undertaken in areas that form the Englefield Green and Egham area as reported and shown at Section 3.2 of Project Centre's report, and shown at Appendix A (Parking Survey Technical Note, Figure 2). These areas were identified following discussions with Councillors and Council Officers. The surveys were undertaken during non-term time (15th and 16th September 2021) and term time (17th and 18th November 2021) to establish the patterns of parking occupancy/stress during these times. The surveys were commissioned by the Council and were subsequently undertaken by MHTC data collection company on the instruction of Project Centre. Their raw data is available for viewing at the end of Appendix A of the Project Centre report. The parking survey indicated some roads within the vicinity of RHUL being at capacity or over capacity during term</p>	
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	<p>raising the number of spaces substantially. We realise the cost of building in significant spaces will be high- it could be that the whole ground floor footprint is used for parking, for example- but that is the price you would have to pay for proposing to build in already congested areas such as EG.</p> <p>8-Alternatively, we suggest that an additional restriction be placed on those who choose to reside in these blocks- that they are banned from having a car. This is not unreasonable if you think about it- the new modes of transport (e bikes, e scooters) are inevitable, and both EG (if we get funding) and RHUL are planning a big expansion of facilities for these modes of transport.</p>	<p>time and non-term time as indicated within the survey data which would be in accordance with the representor's comments. However on average, within the surveyed area there was some level of capacity across the area albeit an average capacity of 70% parking stress during non-term time and 88% during term time which indicates the area surveyed is reaching concerning levels of stress.</p> <p>To confirm, no on-campus surveys were undertaken as part of Project Centre's study. However Project Centre did receive data from RHUL relating to vehicle arrivals between 15th and 19th September 2021 during this period (prior to term time starting for moving in purposes), and the car parking capacity of spaces on site within the campus. Having this data allowed Project Centre to account for the arrivals and potential on-street parking that may have occurred which provided a more accurate account reporting of the baseline data for non-term time student surveys. Based on the information received, Project Centre concluded it was evident that there would be capacity to accommodate the actual arrivals within the campus grounds car park (related to moving in) as summarised on page 4 and 5 of Appendix A.</p> <p>Paragraph 5.14 of the main report references the RHUL Travel Plan which can be viewed on the University's website. No survey was undertaken or</p>	
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		<p>commissioned relating to capacity at the university car parks. If the representor would like this type of information, this should be requested directly from RHUL.</p> <p>3- The parking surveys carried out by Project Centre Ltd show that the parking pressures being experienced in the Englefield Green area are also being caused by people commuting to the local area and not exclusively by residents from nearby PBSA's. This is given the heightened demand for on street parking during the daytime surveys (para 3.2.12 of Project Centre report). Para 4.1.5 of Project Centre's report further suggests that these pressures could be caused by students who are travelling to the University from areas that have limited alternative travel options rather than students living in nearby PBSA.</p> <p>4- Comments noted. The purpose of the literature review is to provide contextual information around how other Local Authorities are setting parking standards for student accommodation. Whilst it is accepted that no two areas are the same, comparator authorities were chosen due to similarities in the nature and context of the location i.e., within Surrey, local transport provision, and the presence of campus universities which vary in size.</p> <p>5-Project Centre's statement at paragraph 5.1.1 is summarising (based</p>	
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		<p>on the evidence provided in section 4) that the setting of PBSA parking standards alone will not solve the current on-street parking pressures/problems as described in section 4 of the report. This section of the report is ultimately stating that new PBSA standards can help shape ownership and demand going forward which will have a positive impact, but will not solve all the current parking pressures (including Englefield Green) as parking pressure in the area is not solely from students parking on residential streets as discussed in Section 4 of the report.</p> <p>6-Support for CPZ noted. Representor is encouraged to discuss this matter further with the Parking Team at Surrey County Council who can be contacted at:  <a href="mailto:highways@surreycc.gov.uk">highways@surreycc.gov.uk</a></p> <p>7-Comments noted, however the evidence produced by Project Centre would not support this approach. As stated in Section 5 of Project Centre's report, setting higher, or minimum, parking standards for PBSAs located close to RHUL may even increase parking demand associated with travel to the university. Facilitating car ownership through high parking provision can lead to habitual car use for short journeys where students may have otherwise used viable alternative, sustainable modes from the PBSA sites. Notwithstanding the above, without the</p>	
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		<p>implementation of CPZ controls in the area, there is no means of managing or restricting student car ownership at new developments.</p> <p>Additionally as stated in paragraph 3.38 which is related to off street parking/ and or higher minimum standards (i.e. provide more parking spaces off street for students in PBSA's) encourages continued car use directly into the built-up areas, which increases congestion and is detrimental to air quality. This would be contrary to the Surrey Climate Emergency targets. RBC has also recently made a commitment to a target of Net Zero carbon emissions for its own operations by 2030. The overarching target for the Borough and the UK is to reach Net Zero carbon emissions by 2050.</p> <p>8-Section 70(1)(a) of the Town and Country Planning Act enables the local planning authority in granting planning permission to impose "such conditions as they think fit". This power needs to be interpreted in light of material considerations such as the National Planning Policy Framework, this supporting guidance on the use of conditions, and relevant case law. Paragraph 55 of the National Planning Policy Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests:</p> <ol style="list-style-type: none"> <li>1. necessary;</li> <li>2. relevant to planning;</li> </ol>	
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		<p>3. relevant to the development to be permitted;</p> <p>4. enforceable;</p> <p>5. precise; and</p> <p>6. reasonable in all other respects.</p> <p>Such a condition attached to any planning consent for a new PBSA which sought to ban occupiers from owning a car, in the opinion of officers, would not meet tests 4 and 6.</p>	
National Highways	<p>1-The new parking guidance will complement the Local Plan policies and it is expected that all new development proposals will follow the requirements of this document. The draft guidance covers a wide range of uses with maximum numbers of parking spaces for commercial and other non-residential development; the proposed number of spaces are in line with NH expectations for the various type of use, some of which are lower than the current guidelines.</p> <p>2-For residential developments flexible 'guidelines' are provided rather than more rigid 'maximum' or 'minimum' standards, the reason provided for this is to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land.</p> <p>3-One of the biggest opportunities for managing down traffic demand on the SRN is associated with limiting parking spaces at a destination, which should be the case when using the draft guidance. This is particularly successful when guidance such as this is supported by the delivery of other sustainable transport measures including the implementation of Travel Plans, the use of which is detailed in the draft guidance and would be welcomed for all new developments, including residential developments.</p>	<p>1-Comments noted</p> <p>2-Comments noted</p> <p>3-In line with this advice, maximum standards are proposed for inclusion in the SPD for non-residential uses. In relation to the comment made regarding Travel Plans, the SPD contains text on Travel Plans in para 4.22. This confirms that as well as requiring Travel Plans for schools, <i>'there is a similar expectation with other institutions, large scale commercial and residential schemes. The County Council has separate guidance on Travel Plans available on their website. Runnymede Borough Council fully supports and will implement the County Council's guidance in respect to travel planning'</i>. The County Council's current Travel Plan guidance from July 2018 can be viewed here: <a href="https://www.surreycc.gov.uk">Travel plans - a good practice guide for developers, July 2018 (surreycc.gov.uk)</a>. This confirms the thresholds to be applied in determining if a Transport Statement and Travel Statement or a Transport Assessment and Travel Plan are required for a range of uses including residential schemes.</p>	Yes to address point 4

	<p>4-The draft guidance also provides guidance on cycle parking requirements for residential and many non-residential developments. The document states that cycle parking provision set out in the SPD is expressed as minimum guidance to further encourage cycle ownership and more cycling trips to be undertaken. Appendix 1 of the draft guidance details the minimum cycle parking for non-residential uses, but there are no minimum guidance for residential developments. The inclusion of the appropriate levels of cycle parking for all types of development and associated infrastructure measures to reduce vehicle trip demand would be expected for all new developments.</p> <p>5-National Highway supports Runnymede Borough Council's commitment to deliver sustainable development, thereby managing down traffic demand on the SRN which this guidance will contribute to, by limiting parking spaces at destinations, and their commitment to work with partners to consult on potential developments coming forward within the borough.</p>	<p>4-Comments noted. A comment has been added below the table in Appendix 2 which sets out that: <i>'As a general point, in terms of requirements for cycle parking for residential schemes, for flats or houses without garages or gardens, a minimum of 1 cycle parking space should be provided for 1 and 2 bedroom units, and a minimum of 2 cycle parking spaces should be provided for units with 3 or more bedrooms'</i>.</p> <p>5-Support welcomed</p>	
<p>Ottershaw Neighbourhood Forum</p>	<p><u>General comments</u></p> <p>1-The document is a confusing read and lacks clarity, particularly in the way the requirements are outlined in the Appendices. The document structure is not logical in some areas. There are sections for non-residential and residential car parking but this is not reflected e.g. for cycles. Appendix 1 and 2 are confusing with respect to secure cycle storage. Recommend this category is added as a separate column to Appendix 2. Whilst it is accepted that Appendix 3 is reproduced from SCC Guidance, it should be noted that it does not align with Appendix 1 and is therefore confusing.</p> <p>2-The document fails to address any current or predicted growth and trends in the use of Cycles and E-bikes and does not include any supporting statistics. E-Bike ownership specifically drives requirements for secure cycle parking. Additionally, assumptions with respect to cycle ownership per household should be addressed.</p>	<p>1-Format of document has been reviewed but is considered to be fit for purpose. However it is agreed that appendix 2 should include information on cycle parking requirements and text in this regard has now been added. It is appreciated that the uses are listed differently within the tables in appendices 1 and 3 however, the format is consistent with the tables included in the Surrey County Council Parking Guidance (November 2021) and as such, no change is proposed given that in the great majority of cases, the Council proposes to adopt the standards recommended by SCC for non residential uses and for EV charging.</p>	<p>Yes in response to points 1, 2, 3, 5, 6, 9, 11, 14, 22</p>

	<p>3-The document, whilst using other Surrey and national policies, guidance and plans as reference points, fails to predict any trends going forwards and is therefore out of date before it has been published. Efforts should be made to be predictive of change, even if this is merely taking past figures and replicating them going forwards. This would then offer more realistic policy foundations whilst also future proofing. If this is not done, the guidance already fails to address the move towards increased active travel such as cycling.</p> <p>4-There does not appear to be a use type in appendix 1 to cover facilities such as leisure centres and sports clubs/grounds. Assume "Training Centres" in appendices includes schools. It is not clear this is the case. Also, car parks appear to be absent from the tables.</p> <p><u>Specific comments</u></p> <p>5-Ref Paras 2.12/2.13. Note that statistics need to be more predictive to add value and shape policy. A prediction to 2021 would be beneficial, using at least the same increase to that of the previous 10yrs. If you do not do this the SPD is already 11years out of date. If addressed this would increase parking allocation requirements. It should be noted that there is no visible downwards trend in car ownership yet, nor government policy to direct it.</p> <p>6-Ref Para 2.15. Note that EV statistics and assumptions have also only been made to 2020, already 2 years out of date.</p> <p>7-Ref Para 2.18. Query why there is no reference and as a minimum some assumptions for rail. Whilst it is accepted it is a regional/national issue itself, its availability/reach/capacity and affordability in the borough is a critical element which affects all other types of travel and associated assumptions and therefore any parking requirements also.</p> <p>8-Ref Para 2.22. Note that security of cycle parking is critical given the rapid trend towards expensive E-bikes. Some consideration should be given for this.</p>	<p>2/3/5/6-It is agreed that this additional background information is useful. Additional text has been added into chapter 3 of the SPD on cycling (including e-bikes and cargo bikes), as well on likely future trends in car ownership.</p> <p>4/23-At the end of the table in appendix 1, it is confirmed that Assembly and leisure and other uses (Class E/F.2/sui generis) will be subject to an Individual Assessment for both car and cycle parking. Specific guidance for parking standards for hospitals is already included.</p> <p>Whilst the SPD does not contain a specific standard for an extension to a car park, in the majority of cases, the car park would be ancillary to another use and the primary use would guide the standard applied when considering any extension to the car parking area. Where a car park is not ancillary to another use, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development.</p>	
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	<p>9-Ref Para 3.12. It is not clear why two sizes, 3m x 7m or 4m x 7m are stated as acceptable for garage dimensions when also accommodating cycles. This should be clarified. Presumably this is linked to the size of property/number of bedrooms i.e. occupants.</p> <p>The standard does not seem to deal with secure cycle parking for developments which have smaller than minimum garages. There should be provision for this as a separate element in situations where this occurs.</p> <p>A garage is intrinsically used as a ground floor “loft” by most people. Query whether the standard should recognise developments where properties do not have lofts as this would raise the parking requirement.</p> <p>10-Ref Para 3.14. A minimum dimension would be beneficial for limited mobility/disabled spaces also.</p> <p>11-Ref Para 3.16. Query why Addlestone Station is called out specifically from other stations. There are secure cycle parking needs not just at Addlestone but all the borough stations.</p> <p>12-Ref Para 3.17. The statement here regarding town centres is contradicted by Appendix 1 which in many cases states that town centre cycle storage is “not necessarily required”.</p> <p>13-Ref Para 3.18. Query whether this type of statement is helpful for specific cases in this SPD. Surely a document hierarchy covers this.</p> <p>14-Ref Para 3.19. EV for disabled given that many developments might only have one space, recommend 1 is stated min. Additionally, query why spaces for public are called out. Limited mobility employees will also have a requirement.</p>	<p>Schools and training centres are two different uses which fall under different use classes unless a school has a residential element to it. A school with no residential element would fall under use class F.1 (Learning and non-residential institutions). Training centres and residential schools and colleges fall under Use Class C2: Residential Institutions. The table at appendix 1 contains specific car and cycle parking standards for schools/colleges and children’s centres close to the bottom of the final page of the table.</p> <p>7-It is not considered that assumptions on rail are required as additional text has been added below the table in Appendix 2 to confirm that, <i>‘It should be noted that in applying these standards, the accessibility to alternative sustainable modes of transport will be considered (including proximity to rail stations, and bus stops (combined with consideration of frequency of services in both cases) as well as key services and facilities (as set out in the Council’s Sustainable Places Part 2 report) and where necessary, this may support an increase or decrease in overall on site parking provision’.</i></p> <p>8-The Cycle parking section in chapter 3 already provides guidance on the provision of cycle parking in new developments, stating that there is an expectation that the parking provision will be safe and secure. The adequacy of cycle parking proposals will be considered against the guidance in the</p>	
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	<p>15-Ref Para 3.20. It is worthy of note that the removal of school buses driving children to other means of active transport is a major driver for current change not addressed by policy.</p> <p>16-Ref Para 3.22. Coaches are in common use by schools for many types of activity, not just travelling to and from school. It should therefore be an embedded development policy requirement to address this.</p> <p><u>Appendix 1</u></p> <p>17- Note that class E3 (Office) is driven more by the numbers of staff as opposed to the space, as such the allocation for this category may be far less than adequate.</p> <p>18- Query the statement “not necessarily required” for those cycle storage categories that are town centre. Do not see why town centres are treated in a different manner. People often use cycles with other modes of transport to travel. As a minimum the statement should be clarified.</p> <p>19-C3 Secure cycle storage for 2-bedroom units should be increased to 2 spaces assuming up to 4 occupants and likely minimum 2. 2 spaces for more than 3 bedroom is also low. Recommend 3 and 4+ Bedroom are dealt with separately.</p> <p><u>Appendix 2</u></p> <p>20-Query meaning of footnote 4 "As the default position, all visitor parking will be treated as unallocated unless agreed otherwise with the applicant". If this means that this allocation can be disregarded without justification, the provision for residential parking for a 2 bed home Suburban of 1 space is inadequate and should be 2 spaces.</p> <p>21-There is no provision for secure cycle parking or even any footnote reference to draw out this requirement. Recommend this is included in this Appendix. Note there is an overlap with Appendix 1 UC C3.</p> <p><u>Appendix 3</u></p>	<p>Parking Guidance SPD by the Development Management team.</p> <p>9-It is proposed to amend the minimum garage sizes (where cycle storage is proposed) to 6x4 or 3.3 x7. This would allow a bike to either be stored at the side of a garage or at the front/rear of a garage.</p> <p>10-This standard is already included in the document at paragraph 4.8 which is concerned with parking for disabled drivers.</p> <p>11-Agreed. This reference has been deleted.</p> <p>12/18- The reason why it is stated that parking is not necessarily required for 3 of the uses within appendix 1, is because the visitors/workers for these uses (pubs, restaurants, takeaways and similar uses) would be expected to use the extensive communal facilities that are available within towns.</p> <p>13-Comments noted, however, it is considered that the wording in this paragraph is clear and fit for purpose.</p> <p>14-Paragraph 3.19 has been amended to confirm that where disabled parking spaces are required within a development, at least 1 should be provided with an EV charging point. The reference to members of the public has been deleted.</p> <p>15-Comment noted. However, the table at Appendix 1 confirms that for schools, for vehicular parking, a case-by-case assessment will be made when considering a planning application, linked to transport assessment/travel plan. In relation to cycle parking, the</p>	
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	<p>22-It is not clear from this table whether the requirements are a minimum or a specific requirement. This should be clarified, e.g. one point for a 6 Bed house would be hopelessly inadequate.</p> <p>23-Although “sui generis” is included there appear to be important standard omissions, an example would be hospitals.</p>	<p>standard for schools at appendix 1 states that a School Travel Plan will be required, to incorporate a site-specific cycle strategy.</p> <p>This approach allows a bespoke car and cycle parking scheme to be developed, appropriate to the school in question and its location, and which considers the ability of people to walk, cycle or travel by public transport to the school, as well as the existence of other policies and practices which are in place and which are associated with the operation of the school (for example a school bus scheme in operation).</p> <p>16- The Council has liaised with the Highway Authority regarding this point. Officers have been advised that it would not be practical/reasonable to expect provision for coaches for the occasions when during the school day they might use coaches for one off excursions/ trips/ days out.</p> <p>17- There is no fixed planning requirement to restrict the numbers of employees in most E3 developments, whereas floor area is easily quantifiable and enforceable.</p> <p>19-To avoid duplication with appendix 2, text about cycle parking has now been deleted from appendix 1 for C3 developments and relocated into appendix 2. This confirms that for flats or houses without garages or gardens, a minimum of 1 cycle parking space should be provided for 1 and 2 bedroom units, and a minimum of 2 cycle parking spaces should be provided for units with</p>	
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		<p>3 or more bedrooms. These standards are in line with Surrey County Council recommendations and are considered appropriate minimum requirements.</p> <p>20-This statement means that visitor parking would generally be expected to serve a development generally, rather than being attributed to specific units. However it should be noted that in response to other comments made on the draft SPD, that specific standards for visitor parking in new residential developments have been revisited and now been deleted. Replacement text on visitor parking is now included below the table in Appendix 2.</p> <p>21-Agreed. Cycle parking standards have been added into appendix 2 and the duplicated text in appendix 1 deleted.</p> <p>22-The EV charging point requirements are minimum standards, and this has now been clarified in Appendix 3.</p>	
Private individual	<p>I would like to ask why we are seeing car spaces being reserved for EV vehicles, as in Chertsey, when there are no charging points to accommodate these vehicles, surely the charging points alone should reserve these spaces, the planning department haven't decided to paint EV on the road as a way of making money from unsuspecting people, long before fulfilling their obligations, at the moment it looks as if those that can afford EV's are given priority and you're fining people that can't afford EV's to pay for their priority.</p>	<p>This comment is considered to go beyond the scope of the Parking Guidance SPD which sets the standards for EV charging points in new developments but does not deal with the installation of this infrastructure. It is unclear from the representation where the car parking spaces being referred to are located. If they are within a Runnymede owned car park, it is suggested that the representor contacts the Council at <a href="mailto:parking@runnymede.gov.uk">parking@runnymede.gov.uk</a> with any queries, if the spaces are on the street, it is suggested that the representor</p>	



		contacts <a href="mailto:highways@surreycc.gov.uk">highways@surreycc.gov.uk</a> . If the spaces are within the premises of private businesses, the representor should contact the business directly.	
Surrey County Council	<p>1-In considering Parking SPDs, the county council, as the local highway authority, takes into consideration two key issues of concern: firstly, whether any highway safety impacts might arise from the SPD; and secondly, whether the proposals might have implications for any sustainable transport strategies. This SPD raises no significant issues with regard to either of these concerns, but we have the following comments that you may find helpful.</p> <p>2-Para 3.18: We are currently in the process of updating our EV charging standards. These should be released in the next month or so.</p> <p>3-Para 3.20: In the last sentence, we would like to suggest that some additional wording is included to reference Travel Plans as well as School Travel Plans as follows:</p> <p><i>Should any updated guidance be adopted by the County Council on Travel Plans or School Travel Plans following the publication of this SPD, it is this updated guidance that should be relied upon for Development Management decision making.</i></p>	<p>1-comment noted</p> <p>2-Noted. These amended standards have been reflected in the final draft version of the SPD</p> <p>3-Suggested amendment incorporated.</p>	Yes-EV charging standards updated in line with latest SCC standards and text in para 3.20 amended in line with SCC suggestion.
The Chertsey Society	<p>1-Overall we think that the SPD looks and will provide sensible guidance for developers.</p> <p>2-However we strongly contest the recommended parking criteria given in Appendix 2. Whilst Government &amp; SCC guidelines for Town Centre parking may be suitable for city centres and County Towns with good public transport provision, unfortunately for towns in Runnymede only one parking space for 2, 3 or 4 bedroom dwelling is totally inadequate as stated in Appendix 2, and will only lead to an increase in on-street parking in nearby residential roads, much to the irritation of local residents. The proposed parking provision should be at least 2 spaces for a 3 bed dwelling and 3 spaces for a 4 bed dwellings. We trust that the parking</p>	<p>1-Support welcomed</p> <p>2- It should be noted that the standards recommended in this section are flexible 'guidelines' rather than more rigid 'maximum' or 'minimum' standards. This enables the locational characteristics of new residential development to be taken into account more closely, including consideration to be given to alternative modes of transport that exist in the locality. However, generally speaking, less parking is expected in town centre locations where alternative modes of</p>	No

	<p>guidance can be increased to realistic levels given the high level of car ownership in Runnymede.</p> <p>3-We welcome the increased provision for charging points for Electric Vehicles ( EV's)</p> <p>4-Finally, we are concerned that there is no mention of the design of roads in new housing developments. Many existing local roads are already nothing better than linear car parks with inadequate sight lines and passing places and many are now becoming difficult for safe passage for emergency services. We regard this as a serious omission in the SPD and serious consideration should be incorporated into the SPD to ensure that roads in new developments do not become saturated.</p>	<p>transport are generally more readily available.</p> <p>3-Support welcomed</p> <p>4-This matter goes beyond the scope of the Parking Guidance SPD. The design of new highways is a matter for Surrey County Council in their role as Highway Authority. They would consider the acceptability of the design of any new roads as part of the planning application process and would assess against relevant guidance (for example, the Surrey Design Guide and Technical Appendix, as well as Manual for Streets).</p>	
<p>Turley on behalf of Vistry Homes</p>	<p>1-Whilst the main direction and policy guidance contained within the document is supported, there are a number of matters which require further consideration and clarity.</p> <p><b>2-Visitor Parking</b> Appendix 2 of the draft SPD sets out the minimum visitor parking provision for new residential development within Use Class C3 and requires 0.5 spaces per dwelling for 2 and 3 bed homes. Whilst we accept the need for and importance of visitor parking within developments, we consider this provision to be excessive.</p> <p>Paragraphs 107 and 108 of the NPPF outline a set out five criteria that should be considered when setting local parking standards for residential and non-residential development as well as stipulating that they should only be set where there is a compelling justification that they are necessary for managing the local road network or for optimising density. However, we contend that this required evidence has not been demonstrated, thoroughly, within the draft SPD.</p> <p>The visitor parking requirements contained in the adopted parking standards for other local authorities within Surrey have been reviewed and a table of the results is included at</p>	<p>1-General support welcomed</p> <p>2-This matter has been revisited and the visitor parking standards are now proposed to be deleted. In place of rigid standards, the following additional text has been added, <i>'Proportionate, well integrated visitor parking is encouraged in residential schemes as appropriate'</i>. This is largely in line with the guidance provided by Surrey County Council in their Vehicle, Cycle and Electric Vehicle Parking Guidance for new development from November 2021.</p> <p>3-Comments noted however if the SPD is adopted before a scheme is approved, the scheme in question should be in accordance with the SPDs in force at the time of the decision.</p> <p>4-part d of policy SD7 confirms that, Development proposals will be supported where they: 'd) <u>Subject to feasibility</u> (officer emphasis), incorporate electrical vehicle charging points in accordance with guidance issued by</p>	<p>Yes in response to point 4, paragraph 3.18 has been amended.</p>

	<p>Appendix 1 of this letter. From this review, it is evident the requirements in the draft SPD are substantially higher than those in other local authorities and that there is a sensitive balance between providing parking quantum and achieving a high-quality design across developments. The majority of other authorities within Surrey do not stipulate a specific visitor parking requirement, rather they encourage a 'design-led' approach or indicate that the provision is at the Council's discretion.</p> <p>In light of this, we consider that the requirement outlined in the draft SPD could hinder the prospects of high-quality design being achieved and ultimately the foundations of good place-making which is contrary to paragraphs 107 and 108 of the NPPF. For example, the high provision of visitor car parking would diminish the prospects of being able to incorporate high levels of landscaping across a development site and could impede the ability to provide safe access to a site, particularly for emergency vehicles if visitor parking is required to be accommodated within primary access roads of the development. As such, we consider that further regard to the proposed patterns of movement within a development site is needed, to shape where visitor parking spaces can be best accommodated, with agreement sought between the Local Planning Authority and developer on the most appropriate provision for the scheme based upon the proposed layout and accessibility of the site.</p> <p>As a result of the above, prior to the adoption of this SPD, we would welcome the visitor parking requirement being revisited.</p> <p><b>3-Car parking guidance for residential development – Garages</b></p> <p>Paragraph 3.12 of the draft SDP stipulates that, in residential schemes, parking spaces within garages will be counted towards the overall parking provision that the internal dimensions of each parking space measure, as a minimum, 6m x 3m, to ensure that a large modern car can be accommodated. Where garages are below this size, they will</p>	<p>Surrey County Council. Paragraph 4.19 of the SPD has been amended to include this policy wording for completeness.</p>	
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	<p>not be counted towards the parking requirement. It is further stated that where cycle storage is proposed within a garage, larger garages with dimensions of 3m x 7m or 4m x 7m would be considered appropriate. It goes onto say that for car ports/car barns the recommended minimum dimensions are 2.9m x 5.5m.</p> <p>Whilst we appreciate this emerging position, we consider it imperative to be mindful of those schemes that are at an advanced stage of design evolution at the time of adoption of this SPD.</p> <p><b>4-EV Charging Points</b> Appendix 3 of the draft SPD outlines the guidance for electric vehicle charging points and indicates that, for residential development, houses will be required to have 1 fast charge socket per house and flats/apartments will be required to have 1 fast charge socket per flat (allocated and unallocated spaces). In addition, it stipulates that for commercial development 20% of available spaces will be required to be fitted with a fast charge socket plus a further 20% of available spaces to be provides with power supply to provide additional fast charge socket.</p> <p>We recognise and understand the opportunities for securing EV charging points across new developments. However, due to site specific constraints of individual development sites, we consider that the policy wording should be re-phrased to state 'where possible' or there should be scope to agree an alternative provision as part of the planning application process.</p>		
Woolf Bond Planning	<p>1-It is appreciated that various sections of the document refer to the proposed car parking standards needing to be applied flexibly dependent upon the locational characteristics of new residential development. However, there are some notable departures from the Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development adopted and consulted upon by Surrey County Council as recently as 2021 and it is within this context that the below representations are prepared.</p>	<p>1-Comments noted. The Surrey guidance confirms on page 4 that:</p> <p><b><i>Application of this guidance</i></b> <i>This guidance is intended to be flexible and used as considered appropriate by the 12 LPAs across Surrey. This is to ensure that parking requirements can</i></p>	<p>Yes in response to points 2, 3, 4 and 5.</p>

	<p>2-First, the Surrey County guidance includes 4 locational categories referred to as 'Town Centre', 'Edge of Centre', 'Suburban' and 'Suburban edge/Village/Rural'. By comparison, the draft Borough guidance includes a 'Town Centre' and 'Suburban/Village/Rural' category only. Whilst a site on the edge of the Town Centre could reasonably replicate the parking provision of a site located inside a Town Centre, a site located on the edge of a settlement would have very different characteristics (and resulting parking demand). As an example, an annotated copy of the Chertsey policy map is provided below and indicates how a site could be located for example only 30 metres away from Chertsey train station but yet on the proposed approach would fall within the same 'Suburban/Village/Rural' category as a site located on the far edge of Chertsey, for example 1.5 Kilometres away from the train station. Indeed, in some circumstances a site located outside the town centre may actually be better related for example to Chertsey train station than a site located at the far end of Chertsey town centre and thus far further away from the train station.</p> <p>The guidance included in Appendix 2 as drafted presently does not include any recognition of the potential accessibility merits of an edge of centre site and groups the 'Suburban/Village/Rural' area into a very wide category. It is recommended that a more precise definition of 4 separate locational characteristics more aligned with the County guidance would be appropriate so to recognise the very different locational merits between the two example sites illustrated on the plan above.</p> <p>3-Second, the guidance suggests the need for provision of 3 spaces for a 4 bed home. This compares to the County guidance that refers to 2 plus spaces as a maximum provision. It is suggested that an approach consistent with the County guidance would be more appropriate especially given the</p>	<p><i>be completely tailored by the LPA to suit the unique circumstances of any given development proposal in accordance with its location.</i></p> <p>Therefore, taking an alternative approach from that suggested by the Surrey guidance to reflect local circumstances is supported by SCC as being appropriate. It should be noted that Surrey Council has raised no objection through the public consultation on the Runnymede Parking Guidance SPD to its contents.</p> <p>2-Given the flexible nature of the residential parking standards, it is considered that additional locational categories are not required. However, to address the point made, additional text has been added below the table in Appendix 2 to confirm that, <i>'It should be noted that in applying these standards, the accessibility to alternative sustainable modes of transport will be considered (including proximity to rail stations, and bus stops (combined with consideration of frequency of services in both cases) as well as key services and facilities (as set out in the Council's Sustainable Places Part 2 work) and where necessary, this may support an increase or decrease in overall on site parking provision'</i>.</p> <p>3- In relation to the proposed standard for 4+ bedroom dwellings, this has been reduced to 2 parking spaces in line with the recommendation in the Surrey Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development</p>	
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	<p>locational differences between different parts of the respective locational characteristic areas.</p> <p>4-Third, in relation to visitor parking the County guidance states that ‘visitor parking is encouraged though is not always necessary’. By comparison, the proposed parking guidance suggests a need for 0.5 visitor parking spaces per 2 or 3 bed home. This is a very significant parking provision especially when considered across all locational characteristic areas. In reality the likelihood of 2 dwellings having 1 visitor at any 1 time is unlikely and therefore the proposed visitor parking provision requirements are disproportionate to true needs. Consequently, a requirement more aligned with the County standards is recommended namely that ‘visitor parking is encouraged where appropriate though is not always necessary’.</p> <p>5-Fourth, the adopted Local Plan includes a settlement focus towards meeting the Council’s challenging minimum housing requirements with growth aspirations being largely directed towards the most sustainable large settlements in the Borough. The adoption of overly demanding parking standards could restrict the ability to meet these housing needs in the more accessible parts of the Borough. In the absence of any clear evidence (and actually the Borough having slightly lower car ownership levels than the County average), it is therefore recommended that amendments are made as outlined to align the proposed SPD with the County guidance. In addition, the residential parking standards should be clearly referred to as ‘maximum’ standards again consistent with the County approach.</p>	<p>guidance (November 2021), albeit it, in line with the other residential parking standards contained in the SPD, this will be applied flexibly to enable development proposals to respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. This proposed approach is considered to be largely in line with SCC’s approach, given that ‘note 1’, which is applied to the 4+ bedroom standard and many of their other recommended residential parking standards states that, ‘Where space permits, it may be appropriate to consider increased provision’. This would indicate that SCC also believes that a degree of flexibility is important in applying their recommended standards.</p> <p>4-This matter has been revisited and the visitor parking standards are now proposed to be deleted. In place of rigid standards, the following additional text has been added, ‘<i>As a general point, proportionate, well integrated visitor parking is encouraged in residential schemes as appropriate</i>’</p> <p>This is largely in line with the guidance provided by Surrey County Council in their Vehicle, Cycle and Electric Vehicle Parking Guidance for new development from November 2021.</p> <p>5The Council is content with the flexible approach proposed in the SPD to enable development proposals to</p>	
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		<p>respond fully and flexibly to the characteristics of their location, taking account of the availability of alternative means of travel in the area, car parking issues in the locality and to make the most efficient use of land. The residential parking standards recommended by Surrey County Council also have a degree of flexibility with half of their standards being supported by 'note 1' which states that <i>'Where space permits, it may be appropriate to consider increased provision'</i>.</p> <p>The Council is committed to keeping the SPD under review and a review chapter has been added at chapter 4 of the document. This sets out that the SPD will be reviewed 3 years post adoption. This review could include consideration of matters such as whether it is appropriate to move to maximum parking standards for new residential schemes.</p>	
Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p><b>Biodiversity enhancement</b> This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures</p>	<p>There is no specific guidance contained in the SPD on any of the matters outlined, and indeed the Parking SPD is considered to not be the most appropriate document to cover such matters. However the Council's Green and Blue Infrastructure SPD and Runnymede Design SPD does provide guidance on these matters and how they should be addressed in new developments which come forward in the Borough.</p>	

	<p>to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape enhancement</b> The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p><b>Protected species</b> Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p>		
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## EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Runnymede Borough Parking Guidance (SPD)	Georgina Pacey

**A. What is the aim of this policy, function or activity? Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?**

The aim of the new Runnymede Borough Parking Guidance SPD is to set out the Council's expectations in respect of parking requirements associated with new development and help ensure that development proposals make satisfactory car and cycle parking provision which is appropriate to their locality and the nature of development proposed.

The new Parking Guidance SPD builds upon the policies set out in the Runnymede 2030 Local Plan to encourage active and sustainable travel, to ensure the safe and efficient operation of the highway network and deliver new development which responds appropriately to its context (notably, Policies SD3: Active & Sustainable Travel; SD4: Highway Design Considerations; SD7: Sustainable Design and EE1: Townscape and Landscape Quality) and as such, it is a fundamental part of the planning policy 'toolkit'.

In setting new local and flexible parking guidance, the Council has sought to strike the right balance between providing sufficient parking for the occupiers of new development, whilst encouraging modal shift when other more sustainable and active travel options are readily available.

The new parking guidance, once adopted, will replace previous car parking guidance from 2001. The new guidance reflects the changes that have taken place in modal and vehicle use since 2001, including increased cycle use and the introduction of electric vehicles, as well as increasing concerns about air quality and climate change in respect to emissions from combustion powered vehicles.

The guidance also draws upon Surrey County Council's updated Vehicular and Cycle Parking Guidance (adopted in January 2018 and updated in November 2021).

The Runnymede Parking Guidance SPD sets out in detail the parking requirements associated with new residential development, and non-residential development including new employment, commercial, leisure and other uses.

The Parking Guidance SPD advises upon the level of car and cycle parking to be considered when preparing proposals for new development. The SPD also sets out detailed guidance upon the provision of new electric charging points, the use of travel plans, car clubs and the

potential circumstances where developments may need to contribute towards the set up or expansion of controlled parking zones.

When finalised, the document will be adopted as a supplementary planning document (SPD) and will be an important material consideration during the determination of planning applications.

The Parking Guidance SPD will not affect any employees or service users on the basis of a protected characteristic(s) they have. Any effects it has on the wider Borough community, including those groups with protected characteristics is likely to be beneficial through the more careful and detailed consideration applicants will give towards ensuring higher quality development in the future.

**B. Is this policy, function or activity relevant to equality? Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential based on adverse impacts or unlawful discrimination.**

**The Protected Characteristics are; Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.**

There are not assessed to be any potential negative impacts on any protected characteristics if the Parking Guidance SPD were to be adopted. It is anticipated that there will be positive impacts for all parts of the community as a result of appropriate levels of parking provision being made associated with new development, aligned to updated planning policy set out in the Runnymede 2030 Local Plan and guidance contained in Surrey County Council's updated Vehicular and Cycle Parking Guidance (adopted in January 2018 and updated in November 2021).

In accordance with adopted Surrey County Council parking guidance, the guidance set out in the new Parking Guidance SPD confirms that parking for disabled drivers needs to be fully considered when planning a new development. The SPD also specifically adopts the parking standards set out in updated Surrey guidance in relation to the provision of parking spaces for disabled users. The guidance set out in the new SPD suggests that:

- for non-residential development, an additional 5% of total parking spaces should be allocated for disabled users or a minimum of 1 space per 750m<sup>2</sup> (whichever is the greater) to meet demand;
- such spaces should have dimensions of 3.6m by 5m and be located no further than 50m from an accessible entrance, (ideally the main entrance), clearly signed and undercover and;
- all parking for disabled drivers should be designed and provided in accordance with the appropriate government guidance.

The guidance also confirms that in non-residential developments where disabled parking spaces are made available, a proportion of these parking spaces should also benefit from EV charging points. The charging points which serve disabled parking bays should adhere to any published national standards on accessible EV charge points which are in force at the time of determination of the planning application.

It is anticipated that the Parking Guidance SPD, through the inclusion of these standards, will provide a positive impact for people with the protected characteristic of disability and age (as there is often a clear link between old age and disability). For example, a well-designed parking scheme within a development that caters for electric cars and cycles, will promote cleaner air and may have the potential to assist those with pollution related breathing issues.

A review of the comments received during the public consultation has been undertaken. Points raised which are potentially relevant to equalities are listed as follows:

- Parents with children often need to do one or two stops in different directions before they even arrive at work on time. Then they often need to travel to after school sports activities, we want our children to breath clean air but we also recognise the need for them to be active and healthy. Children of different ages have different requirements but at a young age they cannot go on buses alone and the chances of it being only one bus is unlikely. Food shopping, Drs appointments, sports clubs, any leisure pursuit without a car is a massive challenge, not everything can be done on zoom!

RESPONSE: The vehicular parking standards recommended in the Runnymede Parking SPD are, in the majority, based on the standards recommended by Surrey County Council, in their capacity as the Highway Authority, and as taken from their Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development (November 2021). It is recognised that the availability of car parking has a major influence on the means of transport people choose for their journeys. It is therefore essential to try and get the balance right, by providing an appropriate level and type of parking, protecting highway safety and promoting transport sustainability. The Parking SPD seeks to strike this balance and also respond to the policies within Surrey County Council's recently adopted Local Transport Plan 4 which seeks to support behaviour change through the Avoid, Shift and Improve principle. NO CHANGE RECOMMENDED

-Parking is a problem all over the Borough. Lack of parking at stations can make many commuters park in the side roads, making it difficult for family, health visitors for the elderly etc. to find parking. RESPONSE: Whilst the SPD does not contain a specific standard for an extension to a station car park, the table at Appendix 1 of the SPD confirms that where a use/type of development is not specifically listed in the table, an Individual Assessment for both car and cycle parking will be required in support of a planning application. This would propose a bespoke car parking scheme, appropriate to the use and/or its location, particularly when taking account of other policies and practices in place and which are associated with the operation of the development. In such circumstances, a site-specific parking and travel plan can take detailed account of the ability of people to walk, cycle or travel by public transport to the station in deciding on the level of parking required. NO CHANGE RECOMMENDED

-Ref Para 3.14. A minimum dimension would be beneficial for limited mobility/disabled spaces also.

RESPONSE: This standard is already included in the document at paragraph 4.8 which is concerned with parking for disabled drivers. NO CHANGE RECOMMENDED

- Ref Para 3.19. EV for disabled given that many developments might only have one space,

recommend 1 is stated min. Additionally, query why spaces for public are called out. Limited mobility employees will also have a requirement.

RESPONSE: Paragraph 4.20 has been amended to confirm that where disabled parking spaces are required within a development, at least 1 should be provided with an EV charging point. The reference to members of the public has been deleted. AMENDMENTS MADE

Continued monitoring of the Parking Guidance SPD will take place after it is adopted which may reveal any positive or negative impacts that exist and will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics through any review of the SPD. A review chapter has been added into the SPD and this confirms that the SPD will be reviewed after a period of 3 years.

**If the policy, function or activity is relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy function or activity does not engage any protected characteristics, then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.**

**C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion? Alternatively, if it is considered that there is an impact on any Protected Characteristics but measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of 'no relevance' or 'no data' is not sufficient.**

The public consultation on the Parking Guidance SPD has provided the opportunity for local communities and other interested parties to provide comments. Those comments related to protected characteristics have been considered. Equality implications as set out in this screening have also been shared with the Council's Equalities Group to ensure that the Parking Guidance SPD is fully compliant with the Equality Act.

Overall, once adopted, the Parking Guidance SPD will be of equal benefit to all members of the community who live, visit and/or work in the Borough.

The Runnymede Borough Parking Guidance SPD sets out the Council's expectations in respect of parking requirements associated with new development. It is fully consistent and complementary to the Runnymede 2030 Local Plan, which has had a detailed EqIA undertaken at each stage of Plan preparation. The Parking Guidance SPD provides detailed guidance to help implement the requirements of Policies SD3, SD4, SD7 and EE1 of the Runnymede Local Plan which have already been assessed under EqIA to have either positive or neutral impacts on protected characteristics of the population.

Continued monitoring of the Parking Guidance SPD will take place after it is adopted which may reveal any positive or negative impacts that exist and will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics.

The SPD is intended to be reviewed 3 years following its adoption.

For the reasons set out in this screening, it is considered that a full EqIA is not required.

**Date completed: Amended version completed 12/10/2022 by Georgina Pacey**

**Sign-off by senior manager: Rachel Raynaud 12/10/2022**

**Gypsy and Traveller Allocation Scheme (Planning Policy and Economic Development Services, Georgina Pacey)**

**Synopsis of report:**

The purpose of this report is to update Members on the progress made in relation to the development of a new draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople for the pitches and plots allocated in the Runnymede 2030 Local Plan.

Following a period of public consultation in Autumn 2021, and subsequent discussions with Counsel, the Allocation Scheme is now proposed to be progressed as a Supplementary Planning Document (SPD). To follow the relevant processes for the preparation of SPD as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a further round of public consultation is proposed prior to the adoption of the document.

This report seeks approval from the Planning Committee to carry out public consultation on the amended draft allocation scheme for a period of 5 weeks. A copy of the amended draft SPD is attached at Appendix A. A number of amendments have been made to the SPD since it last came before the Planning Committee. The key changes are summarised in the body of the report.

**Recommendation(s): The Planning Committee is recommended to RESOLVE to:**

**i) APPROVE the draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document for public consultation for a period of five weeks between Wednesday 16<sup>th</sup> November and Wednesday 21<sup>st</sup> December 2022.**

**1. Context and background of report**

1.1 The adopted Runnymede 2030 Local Plan allocates 10 plots for Travelling Showmen at the Longcross Garden Village and 35 new pitches across 9 housing allocation sites (this includes the retention of 2 existing unauthorised pitches). The provision of new permanent pitches and plots in the Borough is part of the Council's wider strategy contained in the Local Plan to meet the identified accommodation needs of Gypsies, Travellers and Travelling Showpeople.

1.2 Local Plan Policy SL22: Meeting the Needs of Gypsies, Travellers and Travelling Showpeople states the following:

*Where traveller pitches are required to be provided on sites allocated through this Local Plan, the Council will secure their delivery through the imposition of appropriate planning conditions or obligations attached to any planning approval granted. Those obligations will include an appropriate management agreement including measures to secure:*

- *Phasing of site delivery and trigger points to secure early delivery, proportionate to the site delivery;*
- *Measures to ensure the site is secured in perpetuity for Gypsies, Travellers or Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance) as appropriate;*
- *A policy for Allocation (to preserve access for those with local connection); and,*
- *Further to Policy SL20, consideration of delivery of a proportion of the pitches or plots at below market rate, as affordable housing, based on evidence of need as set out in the Council's latest GTAA and viability at the time of the application. This consideration applies to both the provision of pitches or plots on site and in cases where provision is proposed off site.*

- 1.3 The amended draft allocation scheme at appendix A has therefore been produced to build upon and provide more detailed advice on how this part of the policy should be interpreted and applied.
- 1.4 For the avoidance of doubt, the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople Allocation Scheme: SPD (hereafter referred to as the Allocation Scheme SPD ONLY) relates to the pitches and plots specifically allocated through the Runnymede 2030 Local Plan through policies SD9 (Longcross Garden Village), SL6 (Pycroft Road), SL7 (Thorpe Lea Road North), SL8 (Thorpe Lea Road West), SL10 (Virginia Water South), SL11 (Parcel B, Vet Labs site), SL12 (Ottershaw East), SL14 (Parcel A, Chertsey Bittams), SL15 (Parcel B, Chertsey Bittams) and SL16 (Parcel C, Chertsey Bittams).
- 1.5 The draft allocation scheme was considered at the Infrastructure and Economic Development Working Party on 15<sup>th</sup> March 2021 and the Housing and Enablement Working Party on 21<sup>st</sup> July 2021 before being brought to this Committee. Since the Planning Committee meeting of 1<sup>st</sup> September 2021, all Members were invited to a briefing session with officers to discuss the Allocation Scheme in more detail, and the Infrastructure and Economic Development Working Party discussed potential revisions to the Scheme at a meeting held on 23<sup>rd</sup> February 2022.
- 1.6 Following the consideration of the comments made by Members at the meetings listed above, the comments made through the public consultation and the comments made by Counsel, a number of amendments have been made to the Allocation Scheme. The key changes are summarised in paragraph 1.8 below. In addition, in line with Part 5, Regulation 12 of the Town and County Planning (Local Planning (England) Regulations 2012 (as amended), a Statement of Consultation has also now been produced. This is because the regulation quoted above states that,

*'Before a local planning authority adopt a supplementary planning document it must—*  
*(a) prepare a statement setting out—*  
*(i) the persons the local planning authority consulted when preparing the supplementary planning document;*  
*(ii) a summary of the main issues raised by those persons; and*  
*(iii) how those issues have been addressed in the supplementary planning document;*

*and*

*(b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of—*  
*(i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and*



*(ii) the address to which they must be sent'.*

- 1.7 The Statement of Consultation can be viewed at Appendix B. Within this document, all the comments made during the first round of consultation on the SPD can be viewed alongside the officer responses.
- 1.8 The key changes made to the SPD since it was last considered by the Planning Committee are listed as follows:
- Title page amended to confirm that the document is proposed to be a Supplementary Planning Document. More information on this point and the details of the second round of consultation proposed can be found in chapter 1;
  - Provision of further information around how the Council will prioritise applicants for the pitches and plots (chapters 3, 4 and 6);
  - Insertion of new text confirming some of the possible clauses that will be included in the S106s for the allocated sites, including in relation to the production of a Gypsy and Traveller Scheme by the relevant landowner/developer for each of the allocated sites (chapters 3 and 4);
  - Inclusion of information on the future sub letting of pitches and plots post their initial occupation (chapter 3);
  - Insertion of more information on how site owners/developers should determine if an applicant is eligible for a pitch/plot (chapter 5);
  - Inclusion of a new chapter (Chapter 7) to set out the allocation process for any affordable pitches and plots, if they are acquired and controlled by Runnymede Borough Council (includes information relating to shortlisting, offering, viewing and letting of properties, bypassing of applicants, viewings and offers and failure to view;
  - Inclusion on further information on the evidence required in support of an application (chapter 8), particularly for any affordable pitches and plots;
  - Clarification on when an applicant will be able to appeal the Council's decision on eligibility (chapter 11).
- 1.9 A number of other minor changes are also included in the document. All proposed changes can be viewed in the document at Appendix A.

## **2. Report and, where applicable, options considered and recommended**

- 2.1 The most significant change which has occurred since the Allocation Scheme was last brought before the Planning Committee is that it is now proposed to be adopted as a Supplementary Planning Document. The reason for this change in approach is to give the document a greater status in the decision taking process. Whilst SPDs do not form part of the Development Plan, they are material considerations in decision taking. Should the Allocation Scheme not be adopted as SPD, it would be a guidance document, but one to which a more limited amount of weight could be afforded.
- 2.2 Each of the other key amendments made to the document have been set out below with a summary of the reasoning behind each provided:
- 2.3 Provision of further information around how the Council will prioritise applicants (chapters 3, 4 and 6): Information is now contained in the SPD confirming the two categories of applicants who will be eligible to acquire the allocated pitches and plots (whether affordable or market products). These are:

Priority A-applicants who meet the planning definition of a Gypsy, Traveller or Travelling Showman in line with the PPTS (or any subsequent replacement national planning policy) and who have a local connection to the Borough;

Priority B- Applicants who have a local connection to the Borough and are Gypsies, Travellers or Travelling Showmen but who do not meet the Planning definition contained in the PPTS (or any subsequent replacement national planning policy) by reason of the fact that they have ceased to travel permanently.

- 2.4 The SPD also confirms when Priority B applicants will be eligible to acquire allocated pitches/plots.
- 2.5 There is no 'Priority C' category proposed which would allow any other Traveller outside of categories A and B to acquire one of the allocated pitches and plots, including Travellers who do not have a local connection to the Borough. This is because Policy SL22 is clear that the pitches and plots on the allocated sites should be preserved for those with a local connection.
- 2.6 Policy SL22 of the Local Plan sets out the level of need for pitches and plots in the Borough over the Plan period. This need is based on the needs of those who meet the planning definition of a Gypsy, Traveller or Travelling Showperson as contained in the Planning Policy for Traveller Sites (2015). Pitches and plots acquired by Priority A applicants would help reduce these identified needs over the plan period. However, the Council's Gypsy and Traveller Accommodation Assessment (GTAA) also includes an assessment of the accommodation needs of Traveller households that do not meet the planning definition. This assessment is included for illustrative purposes to provide the Council with information on levels of need and to help meet requirements set out in the Housing and Planning Act (2016).
- 2.7 The GTAA states that, *'it is evident that whilst the needs of the 38 households who do not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing'*. Overall, over the Plan period, there is a need for an additional 45 pitches for Gypsies and Travellers and 1-2 plots for Travelling Showpeople who do not meet the planning definition. Pitches and plots acquired by Priority B applicants would help reduce these needs for culturally appropriate housing for this group.
- 2.8 Insertion of new text confirming possible clauses that will be included in the S106s for the allocated sites, including in relation to the production of a Gypsy and Traveller Scheme by the relevant landowner/developer for each of the allocated sites (chapters 3 and 4); The SPD confirms that for each of the allocated sites, the landowner/ developer will be required to produce a Gypsy and Traveller Scheme which will need to be submitted to and approved in writing by the Council and which deals with the following:
  - The delivery of the Gypsy and Traveller Pitches on the Gypsy & Traveller Land;
  - The valuation and marketing of the Gypsy & Traveller Pitches;
  - The disposal and future re sale/sub-letting of the Gypsy & Traveller Pitches; and
  - The maintenance of the Gypsy & Traveller Pitches;
- 2.9 Further information is included in chapter 4 on the type of information that a developer/future owner will be expected to provide to the Council if they are seeking to sell their pitch/plot to a priority B applicant. This includes comprehensive details of their marketing of the pitch/plot at a fair market price. The SPD sets out that the S106 agreements for the allocated sites will include a dispute resolution clause which confirms the process that will be followed if there is a dispute about whether a pitch/plot has been advertised at a fair market price.

- 2.10 Inclusion of information on the future sub-letting of pitches and plots post their initial occupation (chapter 3); The SPD confirms that if a Traveller household acquires a pitch/plot and then decides to sub-let it to another Traveller household, the Council will need to confirm in writing that the prospective occupier is eligible to reside on the pitch/plot when assessed against the criteria in the Allocation Scheme SPD.
- 2.11 Insertion of more information on how site owners/developers should determine if an applicant is eligible for a pitch/plot (chapter 5); This confirms that details of the allocated pitches and plots, once available, should be passed by the developers of the allocated sites to the Council. This will enable the Council to make the eligible applicants, that it holds the details of on its waiting list, aware that pitches are available for purchase. Chapter 5 also confirms that developers can find their own prospective buyers for the pitches and plots. However, in the latter scenario, before a sale is agreed, the prospective buyer found by the developer would need to contact the Council to have their eligibility verified. The Council will need to confirm that an applicant/potential purchaser not on their waiting list is eligible to acquire one of the allocated pitches/plots in writing before the sale/rental of the pitch or plot could be formally agreed.
- 2.12 Chapter 5 also now confirms that groups of Travellers can seek to acquire more than one pitch or plot on an allocated site for their own occupation as long as all individual households are assessed by the Council to be eligible to acquire them at the time of their offers on the allocated pitches/plots.
- 2.13 Inclusion of a new chapter (Chapter 7) to set out the allocation process for any affordable pitches and plots acquired and controlled by Runnymede Borough Council (includes information relating to shortlisting, offering, viewing and letting of properties, bypassing of applicants, viewings and offers and failure to view; The contents of this chapter largely mirrors the approach taken by the Council when letting social housing in the Borough, and as set out in the Council's Housing Allocation Scheme. At the time of producing this report, the Council is not proposing to acquire any of the pitches/plots as affordable products, however this chapter is included to cover this scenario for completeness.
- 2.14 Inclusion of further information on the evidence required in support of an application (chapter 8), especially for any affordable pitches; Text included following discussions with the Housing department to set out their evidence requirements for affordable products.
- 2.15 Clarification on when an applicant will be able to appeal the Council's decision (chapter 11). Confirms that the appeal and review process is open to the following individuals:
- 1-An applicant who wishes to challenge the level of priority they have been assigned (chapter 4);  
This will be because an applicant wishes to challenge one or both of the following:
    - The Council's decision on whether they meet the planning definition of a Gypsy, Traveller or Travelling Showperson as contained in the Planning Policy for Traveller Sites (or any subsequent replacement policy published by the Government).
    - The Council's decision in terms of whether they have a local connection to the Borough.
  - 2-An applicant who wishes to challenge the banding they have been assigned (chapter 6). This is only relevant for affordable pitches.

### 3. **Policy framework implications**

- 3.1 Supplementary Planning Documents (SPD) do not form part of the Development Plan for Runnymede but are material considerations in decision taking. The SPD supports the 2030 Local Plan vision that, *'Runnymede will see healthier and safer communities which benefit from improved life chances and reduced inequalities achieved through the creation of inclusive places delivering a range of housing including for those with specialist needs and the necessary infrastructure to support sustainable communities'*.
- 3.2 The adoption of this SPD would also support a number of Local Plan objectives, most notably objectives 1 and 2 which state:

Objective 1: To protect and improve the health and well-being of the population, reduce health inequalities and improve the quality of people's lives through developing healthier and safer communities and improving life chances;

Objective 2: To support the delivery of at least 7507 high quality additional homes in Runnymede in the period 2015-2030 (an average of 500 homes a year) including the delivery of affordable housing, starter homes, housing for those with specialist needs and plots for those who wish to build their own home;

### 4. **Financial and Resource implications**

- 4.1 Production of the draft Allocation Scheme SPD has occurred in house under the existing budgets of the Planning Policy and Housing teams. The cost of consultation on the draft Allocation Scheme SPD will also be covered by the existing Planning Policy budget for the current financial year.
- 4.2 The Gypsy and Traveller Allocation Scheme SPD, once adopted, will be administered by the Council's Housing Allocations team within the Housing Department. The Corporate Head of Housing has confirmed that no additional resource will be required to administer the application process (including the appeal process), carry out future eligibility checks and maintain and review the waiting list.
- 4.3 Monitoring of the allocated sites and enforcement against any identified breaches in the future could however have financial and resource implications for the Council, especially the Planning Enforcement team. It is possible that supplementary revenue estimates could be required, particularly if legal proceedings need to be commenced.

### 5. **Legal implications**

- 5.1 Officers are not aware of any legal implications as a result of the adoption of this SPD. Following adoption however, Members should be aware that in accordance with Regulation 11(2)(c) & (d) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended), any person with sufficient interest in the decision to adopt the Runnymede Parking Guidance SPD may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and, in any event, not later than 3 months after the date on which the SPD is adopted.

### 6. **Equality implications**

- 6.1 The Council has a Public Sector Duty under the Equalities Act 2020 to have due regard to the need to:

- a) Eliminate unlawful discrimination, harassment or victimisation;
- b) Advance equality of opportunity between persons who share a Protected Characteristic and persons who do not share it;
- c) Foster good relations between those who share a relevant characteristic and persons who do not share those characteristics;

in relation to the 9 'Protected Characteristics' stated within the Act.

6.2 A full Equalities Assessment has been produced which considers the equalities implications associated with the SPD in detail and assesses the likely impacts of introducing the SPD on each protected characteristic. The Equalities Assessment identifies potentially positive impacts on the protected characteristics of disability, gender reassignment, pregnancy/maternity, race and religion/belief, potentially negative impacts on the protected characteristic of age, and neutral impacts on the protected characteristics of marriage/civil partnership, sex and sexual orientation.

6.3 The Equalities Assessment is attached at Appendix C.

## 7. **Environmental/Sustainability/Biodiversity implications**

7.1 A detailed Sustainability Appraisal (SA) was carried out upon the Runnymede 2030 Local Plan. The draft Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD is supplementary to the Local Plan and therefore does not require a separate SA.

7.2 The SPD has however undergone Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening. That screening has concluded that there will be no likely significant effects on designated habitats or any other significant environmental effects as a result of the guidance included in the SPD.

7.3 Officers have sent the screening to the three statutory bodies (Environment Agency, Historic England and Natural England), in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. At the time of writing, officers are awaiting confirmation from these 3 consultees in terms of whether they support the Council's conclusions. The screening report can be viewed at Appendix D.

## 8. **Timetable for Implementation**

8.1 If approval is given by the Planning Committee to consult on the draft Allocation Scheme SPD, the public consultation will take place for a 5 week period between Wednesday 16<sup>th</sup> November to Wednesday 21<sup>st</sup> December 2022. Following the period of public consultation, all comments received will be reviewed, with the Allocation Scheme SPD amended as appropriate. It is anticipated that the final Allocation Scheme SPD will be taken back to Planning Committee for adoption during the first quarter of 2023.

## 10. **Conclusions**

10.1 Officers recommend that the draft Allocation Scheme SPD is approved for public consultation for a period of 5 weeks.

(To Resolve)

**Appendices**

Appendix A-draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD (November 2022)

Appendix B- Statement of Consultation

Appendix C-Equalities Assessment

Appendix D-SEA/HRA screening

# **Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople**

## **Supplementary Planning Document**

**November 2022**

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## 1. INTRODUCTION

- 1.1 This draft Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document (SPD) (otherwise known as 'Allocation Scheme SPD) contains guidance to support the implementation of Policy SL22 of the adopted Runnymede 2030 Local Plan which is concerned with meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople (referred to hereafter as Travellers). Specifically, it seeks to provide further clarity on how the part of the policy on page 100 of the Local Plan, which is concerned with the provision of new pitches and plots on sites allocated through the Local Plan, should be applied.
- 1.2 Once adopted, this SPD will be a material consideration in the Council's determination of planning applications which come forward on the relevant allocated sites.
- 1.3 This draft SPD is open for public consultation from Wednesday 16<sup>th</sup> November to Wednesday 21<sup>st</sup> December 2022. Any comments should preferably be returned by e-mail to [planningpolicy@runnymede.gov.uk](mailto:planningpolicy@runnymede.gov.uk) or alternatively can be posted to: -  
Planning Policy and Economic Development  
Runnymede Borough Council  
Runnymede Civic Centre  
Station Road  
Addlestone  
Surrey, KT15 2AH
- 1.4 All representations made during the course of the consultation must be made in writing and arrive by the close of the consultation period. Anonymous representations will not be accepted. Any comments that could be construed as derogatory towards any particular individual or group will not be recorded or considered.
- 1.5 Copies of comments received during the course of the consultation, or a summary of them, will be made available for the public to view on the Council's website. Comments therefore cannot be treated as confidential. Personal details will be redacted prior to publishing. Data will be processed and held in accordance with the Data Protection Act 2018.
- 1.6 If you have any queries or require any further information, please call the Council's Customer Services team on 01932 838383 or email [planningpolicy@runnymede.gov.uk](mailto:planningpolicy@runnymede.gov.uk).

## 2. BACKGROUND

2.1 The adopted Runnymede 2030 Local Plan allocates 10 plots for Travelling Showmen at the Longcross Garden Village and 35 new pitches across 9 housing allocation sites (this includes the retention of 2 existing unauthorised pitches).

2.2 Local Plan Policy SL22: Meeting the Needs of Gypsies, Travellers and Travelling Showpeople states the following:

*Where traveller pitches are required to be provided on sites allocated through this Local Plan, the Council will secure their delivery through the imposition of appropriate planning conditions or obligations attached to any planning approval granted. Those obligations will include an appropriate management agreement including measures to secure:*

- *Phasing of site delivery and trigger points to secure early delivery, proportionate to the site delivery;*
- *Measures to ensure the site is secured in perpetuity for Gypsies, Travellers or Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance) as appropriate;*
- *A policy for Allocation (to preserve access for those with local connection); and,*
- *Further to Policy SL20, consideration of delivery of a proportion of the pitches or plots at below market rate, as affordable housing, based on evidence of need as set out in the Council's latest GTAA and viability at the time of the application. This consideration applies to both the provision of pitches or plots on site and in cases where provision is proposed off site.*

2.3 This SPD seeks to provide further guidance on how this part of the policy should be interpreted.

2.4 For the avoidance of doubt, the Allocation Scheme **ONLY** relates to the pitches and plots specifically allocated through the Runnymede 2030 Local Plan on the following sites:

<b>Policy reference</b>	<b>Site address</b>	<b>No. of allocated pitches/plots</b>
SD9	Longcross Garden Village	10 plots
SL6	Pycroft Road, Chertsey	5 pitches
SL7	Thorpe Lea Road North	2 pitches*
SL8	Thorpe Lea Road West	3 pitches
SL10	Virginia Water South	2 pitches
SL11	Parcel B, Vet Labs Site, Addlestone	2 pitches
SL12	Ottershaw East, Ottershaw	2 pitches
SL14	Parcel A, Chertsey Bittams, Chertsey	5 pitches
SL15	Parcel B, Chertsey Bittams, Chertsey	2 pitches
SL16	Parcel C, Chertsey Bittams, Chertsey	12 pitches*

\*number includes the retention of an existing unauthorised pitch on the site

## 3. THE PITCHES AND PLOTS BEING OFFERED: General Information

- 3.1 In line with Policy SL22 of the Local Plan, the Council is looking to secure the delivery of permanent pitches and plots for Travellers and:
- Prioritise them for those who meet the planning definition set out in the Planning Policy for Traveller Sites (PPTS) (2015) (or any future iteration of the PPTS/replacement definitions issued by the Government); and,
  - Preserve them for those who have a local connection to the Borough of Runnymede in the longer term (as defined in chapter 4)
- 3.2 The identified accommodation needs for the Borough's Travellers will, in part, be met through the provision of new pitches and plots on sites allocated for development through the Runnymede 2030 Local Plan. The expectation is that the great majority (if not all) of the allocated pitches and plots will be market products which will be sold or let privately by the site owners to Traveller households determined to be eligible by the Council through the application of this Allocation Scheme SPD. Chapter 4 of this Scheme contains details of how the pitches and plots will be prioritised. This prioritisation will be applicable to all pitches (whether market or affordable). Chapter 6 sets out additional eligibility criteria which will be applicable for affordable products.
- 3.3 The allocated pitches for Gypsies and Travellers which the Council is seeking to secure the delivery of, are located in different parts of the Borough. Plots for Travelling Showpeople are only being offered in Longcross.

#### **Prioritising the pitches and plots for eligible Gypsies and Travellers.**

Local Plan Policy SL22 requires the Council to implement measures to ensure that the allocated pitches and plots are secured in perpetuity for Gypsies, Travellers and Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance). This wording in Policy SL22 means that the allocated pitches and plots will be prioritised initially and in the longer term for those Travellers who still lead a nomadic way of life specifically through travelling for employment purposes (even if travelling has paused for a temporary period), and for those who have a local connection to the Borough. To comply with these policy requirements, a suitably worded planning condition or obligation will be attached/secured for each of the allocated sites to secure the aims and objectives of Policy SL22 and this SPD. This condition/obligation would be enforceable by the Local Planning Authority if a breach occurs.

- 3.4 A Gypsy and Traveller scheme will be required under any S106 produced for each of the allocated sites. A Gypsy and Traveller Scheme in this context means a scheme to be submitted to and approved in writing by the Council dealing with the following:
- The delivery of the Gypsy and Traveller Pitches on the Gypsy & Traveller Land;
  - The valuation and marketing of the Gypsy & Traveller Pitches;
  - The disposal and future re sale/sub-letting of the Gypsy & Traveller Pitches; and
  - The maintenance of the Gypsy & Traveller Pitches;
- 3.5 The developer/landowner will be required to submit their Gypsy & Traveller Scheme to the Council for written approval prior to occupation of a certain number of the dwellings on the wider allocation (the number of dwellings that can be occupied before the Scheme is submitted for approval will be set out in the S106 agreement). Under bullet point 3 above, the landowner/developer will be expected to set out how they intend to make purchasers aware

of the restrictions on the occupation of the pitches and how they will make purchasers aware of the steps they need to follow if they intend to sell their pitch or let it at a future date.

### **Timescale for the delivery of the allocated pitches/plots**

- 3.6 It must be remembered that the timing of the delivery of the pitches and plots on the allocated sites (whether market or affordable) is largely controlled by the relevant developers. It may be at the time of an interested party submitting their application form in response to this allocation scheme SPD, that none of the pitches or plots have yet been delivered or are due to be delivered imminently. The Runnymede 2030 Local Plan covers the period up to 2030, and as such, at the time of publishing this Allocation Scheme there are over 7 years of the plan period remaining over which pitches and plots on the allocated sites could be delivered. Policy SL22 of the Local Plan does however require delivery of the allocated pitches and plots on each site, proportionate to the overall site delivery.
- 3.7 The Council's Housing Solutions team will seek to provide advice and/or assistance to any party who applies through the Allocation Scheme SPD and who has an emergency need for housing.

If after submitting an application for one of the allocated pitches/plots, an applicant's circumstances change, they will need to contact the Council's Housing Allocation team as it could affect their eligibility for a pitch/plot.

### **Alternative users**

If within the time period specified in the Section 106 legal agreements for each of the development sites allocated in the Local Plan it has not been possible to secure the disposal of the allocated pitches/plots to Travellers who meet the relevant planning definition and have a local connection to the Borough (in line with the requirements set out in chapter 4 of this Scheme), the Council will allow the pitches and plots to be purchased/occupied by Gypsies and Travellers who can demonstrate a local connection to the Borough, but who do not meet the planning definition of a traveller. This is to meet an identified need for culturally appropriate accommodation for Gypsy and Traveller households who do not meet the planning definition, as identified in the Council's 2018 GTAA. More information on this point is provided in chapter 4.

- 3.8 Therefore any Traveller who applies for a pitch/plot through this Allocation Scheme will have their details retained by the Council until all of the allocated pitches and plots have been sold/occupied. More information on this point can be found in chapter 9 of this document. Once all the pitches/plots have been sold/occupied initially, any remaining applicants will be retained on the Council's waiting list for future sales or re lets unless they ask to be deleted.

### **Sub-letting of pitches and plots**

- 3.9 If a Traveller household acquires a pitch/plot and then decides to sub-let it to another Traveller household, the Council will need confirmation in writing that the prospective occupier is eligible to reside on the pitch/plot when assessed against the criteria in this Allocation Scheme SPD.

## 4. ELIGIBILITY AND PRIORITISATION OF PITCHES/PLOTS

4.1 This chapter sets out the criteria that interested parties must comply with in order for the Council to confirm that they will be prioritised to purchase/rent one of the pitches or plots on one of the allocated sites listed in Chapter 1 of this document. For the avoidance of doubt, the eligibility criteria set out in this chapter apply to both market and affordable pitches. In broad terms, to be immediately eligible for a pitch (and therefore be given the highest level of priority or 'priority A'), applicants must demonstrate that they have a local connection to the Borough, and also that they meet the planning definition of a Gypsy, Traveller or Travelling Showperson for planning purposes as defined by the Planning Policy for Traveller Sites (PPTS) 2015 (or any subsequent replacement national policy issued by the Government). More information on both of these points is set out below.

### **Local connection**

4.2 Allocated pitches and plots will be preserved for those with a local connection to the Borough. This is in line with the requirement set out in Policy SL22 of the Runnymede 2030 Local Plan. To be eligible for one of the allocated pitches or plots, an applicant must demonstrate that they meet at least one of the following criteria:

#### **a) Residence**

- You or a permanent member of your household live in the Borough of Runnymede and have done so for at least three of the past five consecutive years or six out of the last 12 months if an applicant is homeless, or;
- You or a permanent member of your household have resided on a site(s) within the Borough of Runnymede which you have used as winter quarters for at least three out of the past five consecutive years (SHOWMEN ONLY).

#### **b) Employment**

- You or a permanent adult member of your household are currently employed within the administrative boundary of Runnymede Borough Council and have been for at least three of the past five consecutive years<sup>1</sup>, or;
- You or a permanent adult member of your household have regularly traded at fairs, shows and events within the administrative boundary of Runnymede Borough Council for at least three of the past five consecutive years (SHOWMEN ONLY), or;
- You or a permanent adult member of your household have regularly carried out paid employment as part of self-employment within the administrative boundary of Runnymede Borough Council for at least three of the past five consecutive years.

#### **c) Residence through a family member, with unique health / welfare need**

- You or a permanent member of your household have an ongoing unique/exceptional health and/or welfare reason to live in Runnymede. This is based on a specific health service which

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<sup>1</sup> Work should not be of a marginal or ancillary nature and whilst every case will be considered on its own merits, generally it will be expected that applicants can demonstrate that they work for at least 16 hours per week.

only exists in Runnymede and cannot be accessed elsewhere, and which can be evidenced by professionals supporting the household currently.

- 4.3 In this section, unique/exceptional means that the care/support need is unique to a specific health service in the Borough of Runnymede, and cannot be provided anywhere else, including where the applicant currently lives. Support from friends or relatives living in the Borough is not a ground for exceptional need if support is already, or can be, achieved where the applicant currently resides, whether through professional / statutory services, or informal support which may involve travelling. Exceptional and specific health care will have to be evidenced by health professionals currently engaged with the applicant and will be assessed by the Independent Medical Advisor. This ground is meant for exceptional and unique circumstances only. The Council will not pay for any medical reports or other evidence. It is the responsibility of the applicant to provide such evidence in all cases.
- 4.4 In this section, a permanent member of the household means someone who can evidence that they reside with an applicant on a full time basis and have done so for at least the last 12 months consecutively.

**Meeting the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes**

- 4.5 Beyond demonstrating a local connection to the Borough, to be given the highest level of prioritisation for a pitch/plot ('Priority A'), applicants will also need to demonstrate that they (or a permanent member of their household) meet the planning definition of a Gypsy, Traveller or Travelling Showperson. This approach is in line with Policy SL22 which requires the following to be demonstrated for allocated sites:

*'Measures to ensure the site is secured in perpetuity for Gypsies, Travellers or Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance) as appropriate'.*

- 4.6 Specifically, applicants will need to demonstrate that at least one permanent member of their household meets one of the definitions set out in the Planning Policy for Traveller Sites (PPTS) (2015) (or any replacement guidance subsequently issued by the Government). The definitions contained in the PPTS are as follows:

*1. For the purposes of this planning policy "gypsies and travellers" means:*

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

*2. In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

- 4.7 3. For the purposes of this planning policy, “travelling showpeople” means: Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above. Any applicants identifying as Travelling Showpeople or Circus People will be asked on their application form to confirm their membership number with either the Showmen’s Guild, or one of the other organisations listed below for verification purposes.
- The Showmen’s Guild of Great Britain
  - The Society of Independent Roundabout Proprietors
  - The Association of Independent Showmen
  - The Association of Circus Proprietors
  - The Amusement Catering Equipment Society

The applicant will be asked to agree to the sharing of the relevant information from their application form (limited to their name, membership number and any details of fayres attended) to any of the above listed organisations which they confirm they are a member.

- 4.8 In line with the requirements of policy SL22, the allocated pitches and plots will be prioritised for those Traveller households who meet the planning definition and as such will not initially be made available to members of the travelling community who have ceased travelling permanently. The application form produced by the Council for interested parties to complete seeks confirmation as to whether the applicant (or a permanent member of the household) still leads a nomadic way of life, and if he/she/the whole household has ceased to travel for a temporary period, the reasons why. Where travelling has ceased temporarily, applicants will also be asked to confirm when in the future they anticipate recommencing travelling.
- 4.9 In such cases, the Council will need to consider the evidence provided about why travelling has ceased and when it is likely to recommence to draw conclusions as to whether they are satisfied that the travelling has only ceased temporarily. If the Council is not satisfied that this is the case, applicants will be deemed to not meet the planning definition of a Traveller and their prioritisation for an allocated pitch or plot will be downgraded accordingly to the ‘Priority B’ banding.
- 4.10 Applicants will be given the opportunity to provide a supporting statement outlining why they (or a permanent member of their household) believe they meet one of the definitions of a Gypsy, Traveller or Travelling Showman as set out in the PPTS as part of their application.
- 4.11 As set out in chapter 3 of this document, if within the time period specified in the Section 106 legal agreements for each of the allocated sites it has not been possible to secure the disposal of the allocated pitches/plots to Travellers who meet one of the relevant planning definitions and have a local connection to the Borough, the Council will make the pitches and plots available to Gypsies, Travellers and Travelling Showpeople with a local connection to the Borough who do not meet the planning definition. The two different levels of priority are summarised below:

Priority A-applicants who meet the planning definition of a Gypsy, Traveller or Travelling Showman in line with the PPTS (or any subsequent replacement national planning policy) and who have a local connection to the Borough;

Priority B- Applicants who have a local connection to the Borough and are Gypsies, Travellers or Travelling Showmen but who do not meet the Planning definition contained in the PPTS (or any subsequent replacement national planning policy)

**When will Priority B applicants become eligible for allocated pitches and plots?**

- 4.12 Whether for initial sales or lets or future sales/re-lets, the Council will only allow the allocated pitches and plots to be offered to 'Priority B' applicants once it has been demonstrated that they have been comprehensively marketed for the period agreed in Gypsy and Traveller Scheme required as part of the S106 agreement and at a fair market price. A marketing report must be provided to the Council which sets out:
- how the pitch/plot has been advertised (including details of any on line promotions or advertising through certain bodies (for example Friends, Families and Travellers).
  - The price advertised at and details of when any price reductions occurred;
  - Details of numbers of viewings and feedback given;
  - Details of any offers received and any explanation required if offers were not accepted.
- 4.13 If the Council agrees that the pitch/plot has been marketed comprehensively and at a fair market price for the specified period, but it has not been possible to dispose the pitch/plot to a 'Priority A' household, then Priority B applicants would become eligible to acquire a pitch/plot.
- 4.14 A dispute resolution clause will be contained in the S106 agreements for each of the allocated sites and this will confirm the process that will be followed if there is a dispute about whether a pitch/plot has been advertised at a fair market price.



## 5. MARKET PITCHES AND PLOTS-ADDITIONAL INFORMATION

### **Setting the price of pitches and plots**

- 5.1 It must be remembered that in the great majority of (if not all) cases, the pitches and plots on the allocated sites are being offered to the market by developers for private purchase. It is possible that a proportion of the pitches/plots may be affordable housing products and this is discussed in more detail in chapter 6 of this SPD. However the majority will be sold privately via a financial transaction between the developer and the Travellers who have been determined by the Council to meet the eligibility criteria set out in chapter 4 of this Allocation Scheme.

As set out at paragraph 3.4 of this SPD, the Gypsy and Traveller Scheme required to be submitted by the developer/landowner and approved by the Council as part of the s106 legal agreement for each of the allocated sites will be expected to set out a strategy for valuing and marketing the pitches/plots.

- 5.2 If interested parties do not have sufficient funds to purchase a private pitch or plot, they are still able to complete the eligibility questionnaire and express an interest in an affordable pitch/plot. More information on affordable pitches and plots can be viewed in the next chapter.

### **How should a developer determine if an applicant is eligible for a pitch/plot?**

- 5.3 When an allocated pitch/plot on an allocated site is ready to be marketed, the developer should contact the Council and provide a copy of the pitch details. The Council can then send details of the available pitch to all eligible applicants on their waiting list (initially Priority A applicants only) to generate interest. Developers are also able, through marketing the pitches/plots to find other interested parties who are not on the Council's list of eligible applicants. However, in this scenario, before a sale is agreed, the prospective buyer found by the developer would need to contact the Council to have their eligibility verified. The Council will need to confirm that an applicant/potential purchaser not on their waiting list is eligible to acquire one of the allocated pitches/plots in writing before the sale/rental of the pitch or plot can be formally agreed.

Groups of Travellers can seek to acquire more than one pitch or plot on an allocated site for their own occupation as long as all individual households are assessed by the Council to be eligible to acquire them at the time of their offer on an allocated pitch/plot.

- 5.4 Chapter 4 should be referred to for further detail of the categories of prioritisation and for information on when Priority B applicants are able to acquire an allocated pitch/plot.

## 6. AFFORDABLE PITCHES AND PLOTS

6.1 If interested parties do not have sufficient funds to purchase a market pitch or plot, they are still able to apply for a pitch/plot and if eligible, their details will be kept on record and consideration will be given to their applications if any affordable pitches and/or plots are proposed by the developers of the allocated sites. There is a section within the application form where interested parties can indicate an interest in an affordable pitch.

6.2 Policy SL22 sets out the following in relation to the allocated pitches/plots:

*Further to Policy SL20, consideration of delivery of a proportion of the pitches or plots at below market rate, as affordable housing, based on evidence of need as set out in the Council's latest GTAA and viability at the time of the application. This consideration applies to both the provision of pitches or plots on site and in cases where provision is proposed off site.*

6.3 The Council will consult its most up to date Gypsy and Traveller Accommodation Assessment and/or any other relevant evidence on the need for affordable pitches at the time of considering each planning application on the allocated sites to determine whether there is a need for affordable/pitches or plots to be provided.

6.4 Even if the Council decides that there is insufficient evidence to require a developer to provide an affordable pitch/plot, it may be the case that individual developers wish to provide affordable pitches or plots regardless and can secure a registered provider to purchase the pitches/plots. Providing that there are sufficient eligible applicants for affordable pitches from interested parties who apply through this Allocation Scheme SPD, the Council would look favourably on affordable provision on the allocated sites.

### **Prioritisation of Applicants for affordable pitches and plots**

6.5 Paragraph 4.11 of this Allocation Scheme SPD sets out how applicants will be prioritised for pitches and plots. Beyond this, should any of the pitches/plots be affordable products, and should the demand for affordable pitches (as evidenced through the number of eligible applicants who apply through this Allocation Scheme) exceed supply, the Council will assess which of the following banding criteria applies to each applicant where 1 indicates those who will be attributed the highest level of banding within their priority category, and where 5 is the lowest.

6.6 Where more than one applicant has the same level of priority (as described in chapter 4, para 4.11) and the same level of banding (in line with the criteria set out below), the applicant who joined the waiting list first will be given the higher overall level of priority for a pitch/plot.

### **BAND 1-Homeless households**

Reg 175(2) of the Housing Act 1996 (as amended) deals with homelessness and threatened homelessness, stating that, a person is homeless if he has accommodation but—(b)it consists of a moveable structure, vehicle or vessel designed or adapted for human habitation and there is no place where he is entitled or permitted both to place it and to reside in it. Under Section 166A(3) of the Housing Act 1996, the Council should give 'Reasonable Preference' to people with high levels of assessed housing need including all homeless people as defined in

Part VII of the Housing Act 1996, including people who are intentionally homeless and those who are in priority need.

The Council is aware of Gypsies and Travellers who have previously passed through the Borough or resorted to land within the Borough to site their caravans and who have stated that they have no lawful location to place or reside in their caravan. Such individuals are considered to meet the definition of a homeless household and would be prioritised for an affordable pitch/plot if they meet the eligibility criteria set out in this Allocation Scheme.

It is considered that the definition of homelessness would also be met by Gypsies and Travellers who reside on unauthorised sites in the Borough, or who reside on sites in the Borough which only benefit from a temporary planning consent, where this temporary period is approaching its end and the household has no lawful place to go. Again, such households would be prioritised for an affordable pitch/plot if they meet the planning definition of a Gypsy, Traveller or Travelling Showperson as contained in the PPTS.

### **BAND 2-Overcrowding**

This category of prioritisation applies in the following scenarios:

a) The applicant has been assessed as statutorily overcrowded by the Council's Private Sector Housing Officer, provided that any overcrowding is not a result of deliberate actions or failure to adhere to housing advice. Assessments on properties located outside of the Borough of Runnymede will not be taken into account as it is for the local authority in which the property/mobile home is located to take appropriate action.

b) Where a household is statutorily overcrowded (see clauses 324-326 of the Housing Act 1985<sup>2</sup>).

### **BAND 3-Applicants living in unsatisfactory housing (including mobile homes) lacking basic facilities**

This category of prioritisation applies to the following:

a) Applicants without access at all to any of the following facilities:

-Kitchen

-Bathroom

-Inside WC

-Hot or cold water supplies

b) Applicants who occupy a private property which is in disrepair or is unfit for occupation and is subject to a Prohibition Order and recovery of the premises is required in order to comply with the Order as defined by s. 33 of the Housing Act 2004.

### **BAND 4-Medical or disability**

This category of prioritisation applies where an applicant's housing is unsuitable for medical reasons, or due to their disability, but whose housing conditions directly contribute to causing

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<sup>2</sup> <https://www.legislation.gov.uk/ukpga/1985/68/part/X/crossheading/definition-of-overcrowding>

serious ill health which could be rectified through securing an affordable pitch/plot through this Allocation Scheme.

- Supporting evidence will be required from relevant and qualified health professionals and is the responsibility of the applicant to provide. It must be current, relevant and specific to an applicant or a member of their permanent household's condition. The Council will not request or pay for any supporting evidence.
- The Council will consider all recommendations from health professionals but will make the final decision as to the assessment of an application.
- Supporting evidence must be less than 6 months old at the time of any request submitted.

### **BAND 5-Welfare & Hardship**

This category of prioritisation applies where an applicant's current accommodation is causing hardship and a move is required in order to receive care or support.

- This needs to be exceptional whereby the health care is unique to a specific health service in the Borough of Runnymede and cannot be provided anywhere else including in the area where the applicant currently lives.
- Support from friends or relatives living in the Borough is not a ground for welfare if support is already or can be achieved in the current Borough the applicant resides in, whether through professional services or informal support which may involve travelling.
- Exceptional and specific health care will have to be evidenced by health professionals currently engaged with the applicant and will be assessed by the Council's Independent Medical Advisor.
- Applicants who need to move due to domestic abuse / actual violence or threats of violence / extreme harassment / intimidation / hate crime. This may include where a move is necessary to protect a witness to criminal acts. Evidence may be sought from professionals engaged with the applicant. Extreme violence or harassment will be verified through the Police and / or other agencies as appropriate.
- This ground is meant for exceptional and unique circumstances only.

### **BAND 6-All other eligible applicants.**

This banding will be applied to all other applicants to whom the above circumstances (in categories 1, 2, 3, 4 and 5) do not apply.

This banding will also apply to applicants that were originally assessed to have a higher banding, but who have failed to view 2 affordable pitches/plots that they were offered the chance to acquire in the last 12 months without reasonable cause and as assessed by an Allocations Officer.

## 7. ALLOCATION OF ANY AFFORDABLE PITCHES AND PLOTS CONTROLLED BY RUNNYMEDE BOROUGH COUNCIL

- 7.1 If the Council acquires any of the allocated pitches/plots for retention as affordable products, once the transfer of ownership has been completed, the pitch/plot will be allocated by the Council. It is the responsibility of the applicant to satisfy themselves at the point of viewing a property that they wish to make an offer to secure the pitch/plot.

### **Shortlisting, offering, viewing and letting of properties**

- 7.2 Once the Council has an available or vacant pitch/plot, it will consider who has the highest combined priority and banding classification when assessed against the criteria in chapters 4 and 6 of this document. On this basis, the Council will select the applicants to view the available pitch/plot. These applicants will then have the opportunity to secure the pitch/plot.

### **Bypassing of applicants:**

- 7.3 In some situations, a pitch/plot will not be offered to the applicant who has the highest combined prioritisation and banding. Applicants can be bypassed for a number of reasons and these are set out below:
- a) **Applicant is not ready to move:** Applicants may be bypassed where, they themselves decide they are not ready to move.
  - b) **Change in applicant's circumstances:** Applicants may be bypassed where there has been a change in their circumstances which makes them ineligible, including (but not limited to) change in medical requirements, or change in travelling status.
  - c) **Circumstances not confirmed:** Applicants may be bypassed where the required verification process has not been completed within the set timescales (usually 48 hours).
  - d) **No response from applicant:** Applicants may be bypassed where they have been contacted for information by the Council relating to their application and / or a potential offer of a pitch/plot and the applicant has not responded to that contact within a reasonable period of time. This may count as an unreasonable refusal, which may result in a downgrade in banding.
  - e) **Fraudulent application has been made:** An applicant may be bypassed where it has been found that false information has been given. This will usually lead to the application being disqualified from the Pitch and Plot waiting list.
  - f) **Applicant in negotiations/progressing an offer on another pitch/plot:** An applicant will be bypassed if they are in negotiations/progressing an offer for another pitch/plot which they have been offered and which has not been resolved.
  - g) **Applicant is ineligible or unsuitable for the property:** Applicants may be bypassed where their household does not meet the criteria for the property e.g. due to the household size not matching the property size.
  - h) **Anti-Social Behaviour:** Applicants may be bypassed where they or their family members have a recent history of significant antisocial behaviour.
  - i) **Rent arrears/debt (for affordable pitches only):** Applicants may be bypassed where they have current or former rent arrears and/ or other debts with any social or private landlord

which is not being satisfactorily repaid. This will usually lead to the applicant being disqualified from the Affordable Pitch and Plot waiting list. Statutory homeless applicants may be bypassed for this reason but individual circumstances will be assessed by the Council.

**j) Community safety concerns:** Applicants may be bypassed where there are community safety concerns/risks which relate to the applicant, or their household member(s) being placed in a particular pitch or area.

**k) Sensitive letting:** In exceptional circumstances, an applicant may be bypassed for a pitch/plot where they are not considered suitable due to management reasons. For example an applicant who has a history of substance dependency may be bypassed for a pitch/plot in an area where the Council is aware there are a number of other residents with substance dependency problems.

**l) Special requirement of landlord:** Some housing association landlords have very specific applicant criteria built into their allocation policies or charitable rules relating to ages of applicants or area of residence for example. These requirements will usually, but not always, be set out in the adverts and applicants who bid may need to be bypassed if the requirements are not met.

7.4 Applicants are able to request a review against being bypassed. See chapter 11 of this SPD for further details.

#### **Viewings and offers**

7.5 Once the selection of applicants is finalised (excluding any bypassed cases), viewings will be arranged by the Council for the pitches/plots in question

7.6 Only applicants made a provisional offer can view the pitch/plot, and the Council will not allow a representative to view on behalf of an applicant. An applicant can be accompanied by a representative or advocate, but notice must be given to the Council. The final decision to accept or reject a pitch/plot can only be made by the applicant. The Council will not discuss an offer of a pitch/plot or any part of an application with anyone other than the applicant unless there is written permission in place to do so.

7.7 Applicants are not allowed to informally view a pitch/plot. Arrangements for viewings need to be made with the Council directly. Viewings will only be via prior appointment, and when accompanied by an officer of the Council. The Council will not be held responsible for anyone entering a pitch/plot without an accompanied viewing appointment.

7.8 If the household with the highest combined prioritisation and banding does not want to view the pitch or plot in question, it will be offered to the household with the next highest combined priority/banding. See chapters 4 and 6 for further details on how applications are prioritised and banded by the Council.

#### **Failure to view**

For applicants who fail to view two pitches/plots which they are given the opportunity to view in a 12-month period without a reasonable cause, and as assessed by an Allocations Officer:

-An applicant will have their banding reduced to a 6 for 12 months from the date of the last failure to view.

-The reassessment to 'band 6: all other eligible applicants' will also mean a new registration date for that applicant and the loss of accrued time on the waiting list while in a previous higher banding.

- It is the responsibility of the applicant to complete a change of circumstances online to request reassessment after 12 months and the Council will not be responsible for any extended time in this lower banding due to an applicant's failure to request a reassessment.

## **8. EVIDENCE REQUIRED IN SUPPORT OF AN APPLICATION**

- 8.1 The burden is on the applicant to satisfy the Council with appropriate information and evidence that s/he is potentially eligible for an allocated pitch/plot in Runnymede. This chapter summaries the types of information that will be required to support a person's application. The supporting information is also set out within the application form itself.

### **General requirements to prove identity (all applicants)**

Applicants will be asked to provide one of the following to confirm their identity generally:  
Copy of passport, driving license, birth certificate, identity card or suitable equivalent.

Applicants will also be required to demonstrate that they have the right to enter and stay in the UK; this complies with [Immigration Rules part 1: leave to enter or stay in the UK - Immigration Rules - Guidance - GOV.UK \(www.gov.uk\)](#).

### **Local connection (all applicants)**

- 8.2 The following lists provide suggestions for the types of evidence that may be required in support of an applicant's claim that they have a local connection to the Borough:

#### **Connection for employment purposes**

- current payslips, the most recent P60 and/or bank statements to support local connection qualification through employment.
- a self-employed person (including applicants trading at fairs, shows and events), will need to provide the Council with evidence of an on-going viable venture.
- Historic (at least 12 months old) and current P45 or Payslip demonstrating the applicant's (or for the permanent adult member of the household who is seeking to demonstrate the employment link) address(es) of employment.
- Self-employment supporting statement; the applicant will be given the opportunity to provide any evidence that they feel is relevant to support their application.

#### **Connection through living in the Borough**

- Historic and potentially current utility bills demonstrating name and home address(es) of the applicant or the relevant member of the household seeking to demonstrate a local connection to the Borough on the grounds of residence.

#### **Unique or exceptional health/welfare need**

Supporting evidence from relevant and qualified health professionals which is current (less than 6 months old), relevant and specific to an applicant or a member of their permanent household's condition, who is seeking to demonstrate a local connection on this ground.

#### **Additional requirements for applicants seeking an affordable pitch or plot**



All prospective new tenants for any affordable pitches/plots will be required to supply evidence of their financial income and resources. Where applicants are not able to show current entitlement to Income Support, Housing Benefit, Council Tax Benefit (and successor Universal Credit), verification of income and savings will be required prior to applicants being offered accommodation.

Where, at the point of verification, an applicant's net income (or combined income) is greater than the income and / or savings limits as set out below, then an applicant(s) will not be eligible to access any affordable products on offer.

In order for applicants to be eligible for an affordable pitch/plot they will need to demonstrate that:

-They do not have assets (beyond their mobile home and/or touring caravan (and fairground rides/equipment in the case of Travelling Showmen)) or savings that exceed £16,000.

-They earn less than £30,000 per annum if they are a single person/couple household or £50,000 if they are a family.

Applicants may need to provide:

Current payslips, the most recent P60 and bank statements for all working members of the household.

In addition to the above, all applicants applying for an affordable pitch/plot must provide satisfactory evidence of past and current residences for themselves and all permanent household members for the past 5 years. The Council will request documentary evidence from each applicant and will conduct such further enquiries as are reasonable in the circumstances. An application will be cancelled if the applicant fails to provide documentary evidence or other information reasonably required by the Council in order to validate the application.

Specifically, applicants will need to provide details of their current address and a 5-year address history (including details of any periods living on the roadside/no fixed abode), providing details of why previous periods of occupation came to an end.

## 9. DATA PROTECTION AND PRIVACY

9.1 Data collected from applicants in their applications for the allocated pitches and plots in the Borough will be processed in line with the Data Protection Act 2018. For the purpose of the Act, Runnymede Borough Council is the “Data Controller” and so is responsible for the information held.

Applicants, when completing the application form with the intention of acquiring one of the pitches or plots on one of the allocated sites will be required to agree that the Council can share relevant information they have provided with relevant agencies and departments, both within and outside of the Council, in order to process, assess, and verify their application, and subsequently determine if they are eligible for a pitch/plot. The Council may also need to request information from these agencies and departments. This may include information held by credit reference agencies, current or former landlords, government departments, health and/or social care providers and/or a representative agency for Gypsies, Travellers and Travelling Showpeople including the Showmen’s Guild of Great Britain..

9.2 Sensitive personal data such as racial or ethnic origin, criminal offences (including alleged offences) and physical and mental disabilities are required to be recorded under the Equal Opportunities Monitoring statute. Any data provided may be disclosed in accordance with the Freedom of Information Act, although all data will be anonymised.

9.3 Outside of the permissions given to the Council as described in paragraphs 9.1 and 9.2, the disclosure of information included on the application form to a third party is prohibited except on a “need to know” basis in the following circumstances:

- For the purpose of fraud detection, the prevention of crime and the promotion of community safety.
- Where disclosure is a legal requirement.

9.4 The personal data of all applicants who are found to be eligible for a pitch/plot (when assessed against the criteria in chapters 4 and 6 of this document) will be held by the Council until all of the allocated pitches/plots have been initially disposed of. Once all the pitches/plots have been sold/occupied initially, any remaining applicants will be retained on the Council’s waiting list for future sales or re lets unless they ask to be deleted.

9.5 The Council will take disciplinary action against any employee who makes use of any information obtained in the course of their employment for personal gain or benefit, or who passes it to others who might use it in such a way. A report to the police will be made if it appears that a criminal offence has been committed.

## 10. EQUAL OPPORTUNITIES AND MONITORING

- 10.1 The Council is committed to the principle of equal opportunities in the delivery of all its services. Applicants will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require other special services as a result of visual impairment, hearing difficulties, low levels of literacy/illiteracy or for another reason.
- 10.2 Confidential interview facilities are provided at the Civic Offices. There is full access to the Civic Offices for wheelchair users. Home interview services are available for applicants who are elderly or who experience mobility difficulties or have other vulnerabilities.
- 10.3 The Council will seek to ensure that the allocation scheme set out in this SPD is being operated in a manner that is fair to all sections of the community regardless of nationality, ethnic origin, marital status, age, gender, sexual orientation, disability, gender reassignment, pregnancy/maternity and religion. The information provided will be kept confidential and treated with respect.
- 10.4 All applicants applying for a pitch/plot will be asked to provide equalities information. Provision of this information will not be obligatory and not a requirement for acceptance of an application. However, such information will help the Council monitor the number and types of equality groups seeking a pitch/plot and therefore applicants will be strongly advised to provide this information. Equalities records will be monitored regularly to ensure pitches/plots are being allocated fairly.
- 10.5 Allocation policies and any changes to them will be reviewed regularly to ensure they do not operate in ways that discriminate against or disadvantage any particular group.
- 10.6 An Equalities Impact Assessment has been completed on the entirety of this scheme and can be viewed on request.

## **11. APPEALS AND REVIEWS**

- 11.1 All applicants have the right to request general information about their application, including whether they are entitled to any preferential consideration (in line with the criteria set out in chapters 4 and 6).
- 11.2 All applicants will be informed in writing of the Council's decision on their level of priority and banding (the latter only where applicants are applying for an affordable pitch or plot). The written notification will give clear grounds for the decision which will be based on the relevant facts of the case. The applicant(s) will be informed of their right to request a review of the decision.
- 11.3 The appeal and review process is open to the following individuals:
- 1-An applicant who wishes to challenge the level of priority they have been assigned (chapter 4);
- This will be because an applicant wishes to challenge one or both of the following:
- The Council's decision on whether they meet the planning definition of a Gypsy, Traveller or Travelling Showman contained in the Planning Policy for Traveller Sites (or any subsequent replacement policy published by the Government).
  - The Council's decision in terms of whether they have a local connection to the Borough.
- 2-An applicant who wishes to challenge the banding they have been assigned (chapter 6).

### **Review process**

#### **Pre-review stage:**

- 11.4 Applicants who are unhappy with a decision made under this Scheme should in the first instance contact the Council's Housing Allocation Team and explain why they think that the decision is unreasonable. At this time, the Officer will explain in more detail why an assessment has been made. If the applicant remains dissatisfied, they can progress to the formal review stage.

#### **Review process:**

- 11.5 Applicants can submit a review request within 21 days of the date of the original decision. This review will be conducted by an officer senior to the decision maker. The review request should usually be in writing and outline clearly what the applicant's reasons for a review are, and what outcome they are seeking. The applicant will usually be notified of the outcome within 56 days of the Council receiving the review request. In exceptional cases, the Council may need more time to consider a review, and the applicant will be notified of this as early as possible.
- 11.6 Applicants will be invited to submit any further evidence to support their review request, and the Council may seek any further information that it requires to make a decision, including advice from medical or other specialist advisors.

#### **Review of decision to bypass an applicant**

- 11.7 Where an eligible applicant has been bypassed for a pitch/plot, and where they believe they were the highest placed applicant, then they can request a review of the decision.
- 11.8 Applicants who wish to request a review of the decision to bypass their application should follow the same process as laid out in paragraph 11.4 to 11.6 above.

## 12. COMPLAINTS

12.1 The Council has a formal complaints procedure. Applicants can use the complaints procedure if they believe:

- Something has been done badly or incorrectly in the service delivery;
- If something has not been done that should have been done;
- If the service has not been delivered in accordance with policies and procedures;
- If they have been treated in an impolite or discourteous manner.

12.2 All applicants who make a complaint will be treated fairly and objectively. A written reply to any complaint received will be sent out within the timescales set out in the Council's Complaints Procedure, copies of which are available on the Council's website ([www.runnymede.gov.uk](http://www.runnymede.gov.uk)).

## **13. FRAUD**

13.1 The Council works in partnership with the NFI and all applications are subject to a full credit checking process using independent companies contracted to the NFI. By making an application for an allocated pitch/plot an applicant is agreeing to this process. There is also a question on the application form which an applicant is required to answer regarding sharing of information with other agencies.

13.2 The Council will refer applications for verification through Fraud Services if there is any reason to suspect fraud and/or deception and this may lead to prosecution.

### **False or misleading information**

13.3 Gypsy and Traveller pitches and plots are in short supply in the Borough. The pitches and plots being offered through this scheme will provide a much-valued opportunity for settled accommodation for those who qualify for it.

13.4 Therefore, the Council takes a strong approach to dealing with fraudulent applications and false information.

13.5 Under Section 2 and Section 3 of the Fraud Act 2006, an applicant, or someone acting on their behalf, commits an offence if:

- They knowingly or recklessly give false information, or
- They knowingly withhold information that the Council has reasonably required the applicant to give.

13.6 Applicants who are found to have given false information on their application form for the allocated pitches and plots, or in response to a request for further information in support of the application, or during review proceeding, will have their application removed immediately. Following this, an investigation will be carried out.

13.7 Applicants will be given 21 days to provide information showing that they are eligible for a pitch/plot. If they do not reply within this time, or they reply but the Council decides that they are not eligible they will be notified accordingly.

13.8 If, following the investigation the Council decides that a person has given false information or withheld information, it will take one or more of the following actions:

- a) Remove the applicant from Council's list of eligible applicants.
- b) Not allow the applicant to re-apply for one of the allocated pitches or plots for an indefinite period.
- c) Instigate criminal proceedings.

13.9 The applicant will be informed in writing of the Council's decision and action taken.

## **14. REVIEW OF THIS SCHEME**

- 14.1 This Scheme is subject to regular review, and where the Scheme requires changes which are minor in nature, or where the changes are required urgently for legal reasons, or changes in government policy and / or legislation, these changes will be approved by the Chair / Vice Chair of the Housing Committee.
- 14.2 Subject to the urgency of the change, as per paragraph 14.1 above, any major change required to the Scheme will be subject to full public consultation.
- 14.3 All changes to this Scheme will be noted within the Version Control on page 1 of this Scheme, and an updated Scheme document will be uploaded to the Council's website.



Appendix B

**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**

November 2022

- 1.1 The Town & County Planning (Local Planning)(England) Regulations 2012 sets 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 the SPD
- 1.2 Regulation 12 also requires that for the purpose of seeking representations, copies of the Statement of Consultation must be made available with the SPD with details of:
  - i) The date by which representations must be made; and
  - ii) The address to which they must be sent.
- 1.3 This document is the Statement of Consultation for the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD and sets out the persons the Council consulted in preparing the SPD and how their comments have been addressed.
- 1.4 A list of all those persons who will be consulted on the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD is set out in Appendix A (it should be noted that Appendix A lists the individuals, companies and other groups registered on the Council's Planning Policy database in September 2022. It is possible that there may be minor changes in the list of people registered between this time and the adoption of the SPD).
- 1.5 The Council consulted with the three statutory bodies (Environment Agency, Historic England, Natural England) in preparing the SPD and their responses and how these were taken into account can be found in Appendix B. The Council also consulted the statutory bodies on a Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) screening and the responses received and how they were addressed can be found in the SEA/HRA Screening Determination for the Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD (October 2022).
- 1.6 The Council is proposing to hold a public consultation on a draft SPD for just over 5 weeks from Wednesday 16<sup>th</sup> November until Wednesday 21<sup>st</sup> December 2022. The representations which are received during the period of consultation will be summarised in an updated version of this Statement and officer responses setting out how each comment has been taken into account will be inserted into Appendix C.

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

As well as the persons listed below a further 132 individuals on the Planning Policy consultation database were consulted.

Neighbourhood Planning Services	Lichfields
Brooklands College	Stroude Residents Association
Chobham Parish Council	Savills
Ottershaw Village Hall	Forest Estate Community Hub
The Ottershaw Society	UK Power Networks
Runnymede Churches South	Surrey Heartlands CCG
Iain Vellacott Associates Ltd	Muse Developments
Surrey Community Action	Historic England London and South East Region
CBRE Ltd	ASC Finance for Business
Addlestone Community Centre	The Runnymede on Thames
Barton Willmore	Halogen UK
Dhammakaya International Society Of The United Kingdom	JR Marine
Ottershaw Women's Institute	Thorpe Park (Merlin Entertainments Plc)
The Marine Management Organisation	Rainbow Day Nursery & Pre-School
Thames Water	Home Builders Federation
Co Plug	Calatec Ltd
Terence O'Rourke Ltd	Stellican Ltd
Addlestone Salvation Army	Jaspar Group
Youngs RPS	Adams Group Real Estate Ltd (on behalf of Tarmac)
Cameron Jones Planning	Fairhurst
Carter Jonas	Tarmac
Lyne Hill Nursery	Carter Planning Ltd
Anderhay	Addlestone Baptist Church
Hodders	Tetlow King Planning
Turley	The Planning Bureau Ltd
WYG	John Andrews Associates
North West Surrey Valuing People Group	Sheila Wright Planning Ltd.
Richborough Estates	SETPLAN
Blue Cedar Homes	Strutt & Parker
Vanbrugh Land	Urban Green Developments
NK Homes	DHA Planning
Surrey Wildlife Trust	Reside Developments
Planning Potential Limited	Ashill Group
JSA Architects	Woolf Bond Planning
Berkeley Homes	SSA Planning
Stride Treglown Ltd	Shanly Homes

West Addlestone Residents Association	Andrew Black Consulting
Union4 Planning	DPDS Consulting
DevPlan	Pegasus Planning
Paul Dickinson and Associates	IQ Planning Consultants
Rickett Architects	Englefield Green Village Residents Association
Runnymede Christian Fellowship	The Emerson Group
Montagu Evans LLP	Grosvenor Capital
Plainview Planning Ltd	Iceni
JP Electrical Ltd	Vail Williams LLP
Woking Borough Council	PRP
Revera Limited	Aston Mead Land & Planning
Devine Homes	Heatons
DP9 Ltd	Pegasus Group
Chertsey Museum	Quod
ST Modwen	AR Planning
Armstrong Rigg Planning	Sanders Laing
Optimis Consulting	Gladman Developments Ltd
Kinwell Property Investments Ltd	LRG
MSC Group Ltd	New Haw Residents Association
Kevin Scott Consultancy	Allied Telesis
R Clarke Planning Ltd	Glanville Consultants
Hallam Land	Avison Young obo National Grid
Meadowcroft Community Infant School	TASIS The American School in England
The Chertsey Society	Meath School
BLARA, BENRA, RRA & RAR	Philip Southcote School
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	The Kings Church
The Ramblers	Ottershaw and West Addlestone Residents Association (OWAIRA)
The Georgian Group	The Gardens Trust
Virginia Water Community Association	Turn2us
Friends families and travellers	Chertsey South Residents Association
Wentworth Residents Association	Franklands Drive Residents Association
Stonehill Crescent Residents Association Limited Company	The Twentieth Century Society
Egham Residents' Association	Virginia Water Neighbourhood Forum
Runnymede Art Society	Thorpe Village Hall
Woburn Hill Action Group	Addlestone Historical Society
RSPB England	Woodham Park Way Association
Christian Science Society Egham	Runnymede Dementia Action Alliance
Environment Agency	United Church of Egham

Penton Park Residents Association	Kennedy Memorial Trust
CMA Planning	CPRE Surrey
Theatres Trust	Woodland Trust
Thorpe Ward Residents' Association	Chertsey Good Neighbours
Runnymede Council Residents' Association	Chobham Commons Preservation Committee
Laleham Reach Residents' Association	Hants County Council
St. Paul's Church	Office of Road and Rail
WSPA	Enterprise M3 LEP
Voluntary Support North Surrey	Slough Borough Council
Spelthorne Borough Council	South East Coast Ambulance Service NHS Foundation Trust
Royal Borough of Windsor and Maidenhead	North Surrey Campaign To Protect Real Ale
Surrey County Council	International Community Church
Guildford Borough Council	Egham Women's Institute
Wokingham Borough Council	Sport England
Waverley Borough Council	Imperial College
Bracknell Forest Council	Transport for London
Tandridge District Council	Natural England
Rushmoor Borough Council	Free Schools Capital Education and Skills Funding Agency
London Borough of Hillingdon	Homes England
Mayor of London/London Plan team	Civil Aviation Authority
Elmbridge Borough Council	Ashford & St. Peter's Hospital NHS Foundation Trust
Bigbury Neighbourhood Plan Steering Group	Highways England
Windlesham Parish Council	Affinity Water
Wraysbury Parish Council	Brett Aggregates
Newlands Developments	Bellway Homes
The Oxygen Group	Danescroft
Kitewood	Abri
Bluestone Planning	Sovereign Housing Association
NHS Estates	Redrow Homes
Grade Planning	Network Rail
Surrey and Borders Partnership NHS Foundation Trust	ACS School, Egham
Thorpe Church of England primary School	Pycroft Grange School
Manorcroft Primary School	Darley Dene School
St Johns Beaumont	St Ann's Heath Junior School
St Judes C of E Junior School	New Haw Community Junior School
Ongar Place Primary School	Royal Holloway University of London
St Cuthbert's Catholic Primary School	Department for Education
Ottershaw C of E Junior School	Hythe Community Primary School
St Anne's Catholic Primary School	Lyne and Longcross CofE Primary School
Bishopsgate Primary School	Thorpe Lea Primary School
St Paul's C of E Primary School	Sayes Court School

Stepgates Community School	The Holy Family Catholic Primary School
West End Parish Council	Bisley Parish Council
North West Surrey Alliance	Epsom and Ewell Borough Council
London Borough of Richmond Upon Thames	Hart District Council
London Borough of Hounslow	Surrey Police
Mole Valley District Council	Frimley Clinical Commissioning Group
Reigate and Banstead Borough Council	Buckinghamshire Council
Surrey Heath Borough Council	London Borough of Kingston Upon Thames
City Planning	CDS Planning
Beacon Church	Basingstoke Canal Society
Surrey Scouts	Thorpe Neighbourhood Forum
Englefield Green Village Centre	Lyne Village Hall
St John's Church Egham	Longcross North Residents Association
Surrey Muslim Centre	Ottershaw Neighbourhood Forum
Disability Empowerment Network Surrey	Runnymede Foodbank
Runnymede & Weybridge Enterprise Forum	Egham Chamber of Commerce
Runnymede Muslim Society	Lyne Residents' Association
St Paul's Church Egham Hythe	Runnymede Deanery
Just a helping hand	Surrey Positive Behaviour Support Network
New Haw Community Centre	Hamm Court Residents Association
National Trust	Englefield Green Neighbourhood Forum
All Saints New Haw	Arup
Surrey Minority Ethnic Forum	The Victorian Society
Hythe Community Church	Community Life
Egham Museum	Brox Road Action Group
Chertsey Chamber of Commerce	398 Air Cadets
Surrey Chamber of Commerce	Staines and District Synagogue

**Appendix B - Consultation Responses received during the Preparation of the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD and how these were Addressed (specifically through consultation on the HRA/SEA screening document)**

<b>Persons</b>	<b>Summary of Main Issues</b>	<b>How Addressed</b>
Environment Agency (EA)	TBC	TBC
Historic England (HE)	TBC	TBC
Natural England (NE)	TBC	TBC

- 1.7 To help shape the contents of the SPD, the draft Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople was also published for an initial period of public consultation between 15<sup>th</sup> October and 26<sup>th</sup> November 2021. A summary of the comments made during this period of consultation are set out in the table below with a response provided to each to confirm where the comment had been addressed in the November 2022 version of the draft SPD (if applicable).

**Comments made on Allocation Scheme during first round of public consultation on draft document**

<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 'Travellers' and 'Travelling Showpeople'. 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 and rental revenue will flow. RBC already manages a</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 characteristics. This could leave the Council</p>



	<p>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>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	<p>Thank you for consulting Waverley Borough Council on the above consultation. Having reviewed the consultation documentation we have no comments to make.</p>	<p>Noted</p>
Surrey County Council	<p>Thank you for notifying us of this consultation. Our Land &amp; Property team do not have any comments to make on this consultation.</p>	<p>Noted</p>
Private individual	<p>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>	<p>Officers responded to this email 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 prepared which was targeted at the travelling community to simplify what the consultation</p>

		<p>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, Travellers and Travelling Showpeople on the telephone, via email and face to face (with 2</p>
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		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.
Surrey Gypsy Traveller Communities Forum	<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>It is important that such sites should be clearly shown as part of the original plan, not added afterwards so that</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>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	<p>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:</p> <p>-those who are overcrowded but own no other land on which they can expand into;</p>	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, there is a banding system included which will consider whether applicants are impacted by a

	<p>-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>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, 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> On the application form, the question will be asked, “do you or have you ever owned property and/or land”. The application form will confirm that if applicants are found to provide false or misleading documents that they will be disqualified. Furthermore, all applicants will be run through a fraud search at the time of their application.</p>
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		<p>These measures will help ensure that those with land/property elsewhere are identified wherever possible.</p> <p>3-Agreed, for affordable plots, the Allocation Scheme has been amended to confirm that the value of any fairground rides owned by the applicant will not be included in the calculation of residual assets.</p>
Showmen's Guild	<p>1-concerns about speculators acquiring the plots.  2-anyone who acquires a plot should not be allowed to sell them on or sublet them for a specified period of time. Concerned about people trying to profit from the activity  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.  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>1/2- The allocation scheme has been designed to prevent speculators acquiring the allocated pitches/plots as they can only be acquired by those who are deemed to be eligible under the allocation scheme. S106 clauses/planning conditions can be used to help ensure that the pitches/plots are only occupied by eligible households. This would include through future sub lets. Additional text has been added into the SPD to confirm this point.  3-Noted. This will be addressed in the application form.  4-Request noted. The draft application 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>

**Appendix C - Summary of Representations on the draft Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD and the Council's Response**

**TABLE TO BE COMPLETED FOLLOWING SECOND PERIOD OF CONSULTATION**

Name	Response	Comment	Amend SPD?

## EQUALITY SCREENING

Equality Impact Assessment guidance should be considered when completing this form.

POLICY/FUNCTION/ACTIVITY	LEAD OFFICER
Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople	Georgina Pacey

**A. What is the aim of this policy, function or activity?** Why is it needed? What is it hoped to achieve and how will it be ensured it works as intended? Does it affect service users, employees or the wider community?

The aim of this Allocation Scheme is to clearly set out the different criteria which an applicant will need to meet in order to be eligible for a gypsy/traveller pitch or travelling showman's plot in Runnymede. This allocation scheme only relates to the pitches and plots allocated through the following adopted policies of the Runnymede 2030 Local Plan: SD9: Longcross Garden Village, SL6: Pycroft Road, Chertsey, SL7: Thorpe Lea Road North, Egham, SL8: Thorpe Lea Road West, Egham, SL10: Virginia Water South, SL11: Parcel B, Vet Labs site, Addlestone, SL12: Ottershaw East, Ottershaw, SL14: Chertsey Bittmas A, SL15: Chertsey Bittams B, SL16: Chertsey Bittams C.

Policy SL22 of the adopted Local Plan which is concerned with meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople states, *'Where traveller pitches are required to be provided on sites allocated through this Local Plan, the Council will secure their delivery through the imposition of appropriate planning conditions or obligations attached to any planning approval granted. Those obligations will include an appropriate management agreement including measures to secure [amongst other things]:*

*-Measures to ensure the site is secured in perpetuity for Gypsies, Travellers or Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance) as appropriate;*

*-A policy for Allocation (to preserve access for those with local connection);*

The Allocation Scheme has been produced to build upon and provide more detailed advice on how this part of the policy should be interpreted and applied.

It is anticipated that the adoption of an Allocation Scheme for the allocated pitches and plots will ensure that they are purchased/occupied by Gypsies and Travellers who not only meet the definition of a Gypsy/Traveller or Travelling Showperson for planning purposes as set out in the Planning Policy for Traveller Sites (PPTS) but also meet the identified accommodation needs identified in the Council's 2018 Gypsy and Traveller Accommodation Assessment (GTAA). As part of the GTAA, all of the Borough's Gypsies, Travellers and Travelling Showpeople were invited to take part in an interview with the Council's researchers to provide information about their own (and their family's where relevant) accommodation needs at the time of interview and also as predicted in the future to help the Council meet the Government's aim of ensuring that local planning authorities, working collaboratively, develop



fair and effective strategies to meet needs through the identification of land for sites.

One of the aims of the Local Plan and, the key aim of this Allocation Scheme is to meet the accommodation needs of Gypsies, Travellers and Showpeople as identified in the Council's 2018 GTAA.

In the drafting of this Allocation Scheme, the input of the Council's Housing and Legal Services teams has been sought to ensure that the Allocation Scheme is realistic and achievable. Once adopted, the Council will be able to measure whether or not the Scheme is working as intended when the next full update of its GTAA is completed. This will determine whether the accommodation needs of the Borough's Gypsies, Travellers and Travelling Showpeople have decreased since the assessment published in January 2018.

The Allocation Scheme will not affect any employees or service users on the basis of a protected characteristic(s) they have. Any effects it has on the wider Borough community, including those groups with protected characteristics is likely to be beneficial, particularly for Gypsies, Travellers and Travelling Showpeople, through the provision of permanent authorised pitches/plots to live on. It must be recognised however that it is possible that some members of the Gypsy, Traveller and Travelling Showpeople communities who would like an authorised permanent pitch or plot to live on will not be eligible for a pitch/plot which could mean that any current accommodation needs they have will remain unresolved.

**B. Is this policy, function or activity relevant to equality?** Does the policy, function or activity relate to an area in which there are known inequalities, or where different groups have different needs or experience? Remember, it may be relevant because there are opportunities to promote equality and greater access, not just potential for adverse impacts or unlawful discrimination. The Protected Characteristics are; Sex, Age, Disability, Race, Religion and Beliefs, Sexual Orientation, Marriage and Civil Partnership, Gender Reassignment, Pregnancy and Maternity.

The Allocation Scheme is relevant to equality. It relates to the allocation of pitches and plots to a group(s) who often have different accommodation needs to that of the settled community and who are known to experience inequalities. Romany Gypsies, Scottish Gypsy/Travellers and Irish Travellers have all been declared by the courts to be protected as 'races' under the Equality Act 2010.

The House of Commons committee report from 5<sup>th</sup> April 2019 titled, 'Tackling inequalities faced by Gypsy, Roma and Traveller communities found that Gypsy, Roma and Traveller people have the worst outcomes of any ethnic group across a huge range of areas, including education, health, employment, criminal justice and hate crime.

In the Equality and Human Rights Commission report 'Inequalities experienced by Gypsy and Traveller communities: A review' from 2009 found *'The lack of suitable, secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience...Evidence is now available about the extent of provision and unmet need, as a result of the requirement for housing authorities to carry out formal accommodation assessments. These highlight a considerable shortfall in the quantity of residential and transit accommodation available to Gypsies and Travellers who do not wish to reside in conventional housing...Many Gypsies and Travellers are caught between an insufficient supply of suitable accommodation on the one hand, and the insecurity of unauthorised encampments and*

*developments on the other: they then face a cycle of evictions, typically linked to violent and threatening behaviour from private bailiff companies. Roadside stopping places, with no facilities and continued instability and trauma, become part of the way of life. Health deteriorates, while severe disruptions occur to access to education for children, healthcare services and employment opportunities’.*

However, the Local Plan, and this related this Allocation Scheme is seeking to help address the known inequalities experienced by Gypsies, Travellers and Travelling Showpeople by providing a mechanism for them to access suitable, secure accommodation through the provision of permanent, authorised pitches and plots for members of the communities who have a local connection to the Borough. This is considered to be a positive step forward. The allocations themselves are considered to be in sustainable locations with good access to a range of local facilities (including healthcare and education facilities) which the Council hopes will have a positive knock-on effect in helping the travelling communities accessing these much needed services, and addressing the known inequalities that these communities face.

If the policy, function or activity is considered to be relevant to equality then a full Equality Impact Assessment may need to be carried out. If the policy function or activity does not engage any protected characteristics then you should complete Part C below. Where Protected Characteristics are engaged, but Full Impact Assessment is not required because measures are in place or are proposed to be implemented that would mitigate the impact on those affected or would provide an opportunity to promote equalities please complete Part C.

**C. If the policy, function or activity is not considered to be relevant to equality, what are the reasons for this conclusion?** Alternatively, if there it is considered that there is an impact on any Protected of Characteristics but that measures are in place or are proposed to be implemented please state those measures and how it/they are expected to have the desired result. What evidence has been used to make this decision? A simple statement of ‘no relevance’ or ‘no data’ is not sufficient.

It is concluded that this Allocation Scheme will have an impact on the Protected Characteristic of Race.

The Allocation Scheme proposed seeks to firstly ensure that any eligible applicants meet the planning definition of a Gypsy, Traveller or Travelling Showperson. The Planning Policy for Traveller Sites (PPTS) sets out the relevant definitions in Annex 1. Applicants will be given the opportunity on their application form to provide a brief supporting statement setting out why they are of the view that they meet the definition of a Gypsy, Traveller of Travelling Showman for planning purposes.

The Council’s 2018 Gypsy and Traveller Accommodation Assessment (GTAA) provides the evidence of the level of need for new pitches and plots in Runnymede, and the Local Plan seeks to meet the level of need evidenced in this document. The GTAA calculated the accommodation needs of Borough’s Gypsies and Travellers based on interviews with the Borough’s Gypsies and Travellers. It is for this reason that a local connection element has been included in the Allocation Scheme-to make sure that the new pitches and plots are meeting the needs identified in the GTAA itself.

Finally, for affordable pitches and plots, the Allocation Scheme seeks to prioritise eligible Gypsies and Travellers who are in the greatest level of need. This includes those who can demonstrate that one of the following circumstances applies:

- Welfare and hardship
- Overcrowding
- Homelessness
- Those living in unsatisfactory housing lacking basic facilities
- Those with specific medical conditions or disability

It is considered that this would help address accommodation inequalities where they are most acute.

It is recognised that Gypsy and Traveller communities face inequalities in education and the House of Commons Briefing Paper on Gypsies and Travellers from 9<sup>th</sup> May 2019 highlighted the low literacy levels in the Gypsy and Traveller communities compared with the settled community as being a barrier in many different areas and contributing to inequalities elsewhere. Therefore assistance will be offered to any interested person in completing the application form as it is recognised that some interested parties may otherwise experience a barrier to applying for one of the pitches or plots.

A six-week public consultation will be held on the proposed Allocation Scheme. This will include targeted consultation with planning agents who are known to represent Gypsies and Travellers in Runnymede, representative groups for Gypsies, Travellers and Travelling Showpeople, as well as travellers living in the Borough. In relation to the Gypsies, Travellers and Travelling Showpeople themselves, it will be ensured that consultation material is kept concise, in plain English and with it being made clear who interested parties can contact by telephone or email for more information.

Any comments made on the draft Allocation Scheme will be carefully considered by the Council before the scheme is finalised and adopted. Equality implications will also be discussed with the Council's Equalities Group to ensure that the Allocation Scheme is fully compliant with the Equality Act.

Once adopted, the Allocation Scheme is considered to be likely to have a positive benefit for the traveller community in terms of allocating permanent pitches and plots for members of the community who meet the relevant eligibility criteria. Eligible applicants will be prioritised where they are in most need.

The Allocation Scheme is considered to be consistent and complementary to the Runnymede 2030 Local Plan, which has had a detailed EqIA undertaken at each stage of Plan preparation. The Allocations Scheme provides detailed guidance to help implement the relevant parts of policy SL22 and of policies SD9: Longcross Garden Village, SL6: Pyrcroft Road, Chertsey, SL7: Thorpe Lea Road North, Egham, SL8: Thorpe Lea Road West, Egham, SL10: Virginia Water South, SL11: Parcel B, Vet Labs site, Addlestone, SL12: Ottershaw East, Ottershaw, SL14: Chertsey Bittmas A, SL15: Chertsey Bittams B, SL16: Chertsey Bittams C. The requirements of the above listed policies have already been assessed under Local Plan EqIA to have either positive or neutral impacts on protected characteristics of the population, including Race. Continued monitoring of the Allocation Scheme will take place after it is adopted which may

reveal any positive or negative impacts that are resulting which will assist officers in providing measures that seek to mitigate any negative impacts on any of the protected characteristics through an amendment(s) to the scheme.

Overall, when considering all the elements in the round, it is considered that a full Equalities Impact Assessment is required prior to the adoption of the allocation scheme given the potential impacts of the scheme on the protected characteristics of race/ethnicity.

This screening assessment will need to be referred to the Equality Group for challenge before sign-off.

Date completed: 18.08.2021

Sign-off by senior manager: Georgina Pacey 18.08.2021. Minor amendments as shown tracked made on 17.10.2022

# EQUALITY IMPACT ASSESSMENT

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## SCOPING

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**1. What aspects of the policy function or activity are particularly relevant to equality?** Other aspects should not necessarily be excluded from the assessment, but attention should be focused on the most important areas and include which of the equality strands the policy function or activity is relevant to. Diversity within the strands should also be considered. Please consider whether any comments made in Part B of the Screening form are relevant here.

By way of introduction, the scope of this EqIA is Borough-wide as it concerns future development across different parts of the Borough. The Council recognises the duty to facilitate the traveller way of life and protect this without discrimination.

As set out in the response given to Part B of the screening assessment above, it is considered that the Allocation Scheme (now proposed to be a Supplementary Planning Document (SPD)) as a whole is relevant to equality as it relates to the allocation of pitches and plots for a group who often have different accommodation needs to that of the settled community and who are known to experience inequalities. Romany Gypsies and Irish and Scottish Travellers are recognised as having a protected characteristic under the Equality Act 2010. Equalities issues related to the protected characteristic of race have therefore been identified.

Through the implementation of the Allocation Scheme SPD, positive impacts will be experienced by Gypsy and Traveller communities who will benefit from new permanent pitches and plots. The wider settled community, including those with protected characteristics, are expected to benefit from the reduction in the need for illegal encampments; and the transparent system for the allocation of pitches and plots is further expected to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not, and to foster good relations between persons who share a relevant protected characteristic and persons who do not. This is supported by the Commission for Racial Equality who found in 2006 that 67% of local authorities reported tension between Gypsies and Travellers and other groups in their area, while 94% of these identified unauthorised encampments as the cause of the tension.

The House of Commons committee report from 5<sup>th</sup> April 2019 titled, 'Tackling inequalities faced by Gypsy, Roma and Traveller communities found that Gypsy, Roma and Traveller people have the worst outcomes of any ethnic group across a huge range of areas, including education, health, employment, criminal justice and hate crime.

In the Equality and Human Rights Commission report 'Inequalities experienced by Gypsy and Traveller communities: A review' from 2009 found *'The lack of suitable, secure accommodation underpins many of the inequalities that Gypsy and Traveller communities experience...Evidence is now available about the extent of provision and unmet need, as a result of the requirement for housing authorities to carry out formal accommodation assessments. These highlight a considerable shortfall in the quantity of residential and transit accommodation available to Gypsies and Travellers who do not wish to reside in conventional*

*housing...Many Gypsies and Travellers are caught between an insufficient supply of suitable accommodation on the one hand, and the insecurity of unauthorised encampments and developments on the other: they then face a cycle of evictions, typically linked to violent and threatening behaviour from private bailiff companies. Roadside stopping places, with no facilities and continued instability and trauma, become part of the way of life. Health deteriorates, while severe disruptions occur to access to education for children, healthcare services and employment opportunities'.*

However, the Local Plan, and this related Allocation Scheme SPD is seeking to help address the known inequalities experienced by the Gypsy and Traveller communities by providing a mechanism for them to access suitable, secure accommodation through the provision of permanent, authorised pitches and plots for members of the communities who have a local connection to the Borough. This is considered to be a positive step forward. The allocations themselves are considered to be in sustainable locations with good access to a range of local facilities (including healthcare and education facilities) which the Council hopes will have a positive knock-on effect in helping the travelling communities accessing these much needed services.

Within the scheme itself, equalities issues are also potentially raised by the Council's proposal to prioritise the pitches and plots for members of the travelling communities who continue to lead a nomadic way of life, or who have only ceased to travel temporarily (falling with the Priority A category as described at paragraph 4.11 of the Allocation Scheme SPD). This could disadvantage older/retired members of the travelling community who have a local connection to the Borough but who have ceased to travel for work permanently. Such applicants would be known as Priority B applicants (see para 4.11 of the Allocation Scheme), and would only be eligible to acquire the allocated pitches and plots if there was insufficient take up of them by Priority A applicants. Case law has established that 'travelling' in the context of applying the planning definition of a gypsy, traveller or travelling showperson will only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence (see Runnymede Gypsy and Traveller Accommodation Assessment 2018 (GTAA), pages 11 and 12). Further equalities matters have therefore been identified related to the protected characteristic of age. This is a new equalities matter identified beyond the original Equalities screening.

**2. Set out the available evidence that will help you assess the impact of this policy function or activity on equality.** This could include service-level monitoring data, analysis of complaints/enquiry records, existing user feedback, data obtained from external sources and information about the local community. You may find it useful to compare your service-user statistics against the [Runnymede population profile](#).

The 2030 Local Plan allocates permanent pitches and plots for Gypsies and Travellers. The Allocation Scheme SPD sets out how the Council will assess who is eligible for these pitches and plots. In short, the Allocation Scheme SPD proposes that the pitches and plots will be prioritised for Gypsies, Travellers and Travelling Showpeople who meet one of the planning definitions set out in the PPTS, and who have a local connection to Runnymede. In terms of the evidence that will help assess the impact of the Allocation Scheme SPD on equality, the following studies have been analysed:

**The 2018 Runnymede GTAA<sup>1</sup>** confirmed that at the time of assessment, there were 10 unauthorised sites/yards in Runnymede containing 46 pitches/plots. A further 5 private sites/yards only had temporary planning consent for the 11 pitches/plots contained. 12 households were living a roadside existence. The GTAA sets out the level of needs for pitches and plots who meet the planning definition of a traveller up to 2030. The Runnymede 2030 Local Plan is based on the evidence of need in the GTAA and concludes that there is a need for 83 pitches and 19 plots between 2015 and 2030 to meet current and future needs of the Borough's travelling community. The local plan allocates 35 new pitches and 10 plots to help meet these needs. In summary, the GTAA concludes that there is a significant level of unmet need for pitches and plots in the Borough. Analysis of the household interviews reveals that much of the need for new pitches is from existing families (as opposed to a future need from teenagers who in the coming years will be forming their own households). Specifically, there is a current need for pitches/plots from 32 unauthorised pitches and 23 pitches for concealed or doubled-up households or adults. For plots, out of the needs identified, 7 plots were concluded to be required for concealed or doubled-up households or adults, suggesting an immediate need. This is why the Local Plan sets out in policy SL22 that of the needs identified, the majority of pitches and plots would ideally be provided by 2022 (71 pitches and 16 plots).

Furthermore, the GTAA also includes an assessment of the accommodation needs of Traveller households that do not meet the planning definition. This assessment is included for illustrative purposes to provide the Council with information on levels of need and to help meet requirements set out in the Housing and Planning Act (2016).

The GTAA states that, *'it is evident that whilst the needs of the 38 households who do not meet the planning definition will represent only a very small proportion of the overall housing need, the Council will still need to ensure that arrangements are in place to properly address these needs – especially as many identified as Romany Gypsies and may claim that the Council should meet their housing needs through culturally appropriate housing'*. Overall, over the Plan period, there is a need for an additional 45 pitches for Gypsies and Travellers and 1-2 plots for Travelling Showpeople who do not meet the planning definition. 38 of these pitches were identified as being needed within the first 7 years of the plan period (2015-22). Pitches and plots acquired by Priority B applicants would help reduce these needs for culturally appropriate housing for this group.

To conclude, the GTAA shows that there is an urgent and pent-up need for new traveller pitches and plots in the Borough for Gypsies and Traveller who meet the planning definition and for those who have ceased to travel, but who still require culturally appropriate accommodation.

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<sup>1</sup> [Planning policy evidence based documents – Runnymede Borough Council](#)

As an urgent need for pitches and plots has been established in the Borough, studies have been reviewed which have looked at the inequalities faced by Gypsy, Traveller and Showpeople communities in England, including relating to the effects that their living conditions (including not having an authorised place to live) and factors in other areas of their lives have, for example on health outcomes. Some key findings are listed below:

**'Inequalities experienced by Gypsy and Traveller communities: A review'** from 2009 (see relevant text in response to question 1 above.

**-Friends, Families and Travellers Briefing: Lack of increase in Affordable Pitches for Gypsies and Travellers in England, December 2017**<sup>2</sup> states that: There is a recognised national shortage of sites for Gypsies and Travellers. Quotes the Better Housing Briefing Paper 261 which found that Romany Gypsies and Irish Travellers have the highest rate of housing deprivation of any minority ethnic group in the UK and are 7.5 times more likely to experience housing deprivation than other groups. This means that many families do not have a place to stop or call home. This has serious health and social implications for Gypsy and Traveller families, many of whom cannot access basic water and sanitation and experience difficulties in accessing services such as education and healthcare. Due to the lack of available pitches families are forced to camp in public spaces, where they are often the victim of hate crime, and the existence of roadside camps can lead to damaging relationships with the settled community.

**The Better Housing Briefing Paper 10: Gypsies, Traveller and Accommodation (2009)**<sup>3</sup> found that, 'Ensuring access to appropriate accommodation is key to engaging with the diverse inequalities and barriers to service provision experienced by Gypsies and Travellers'.

**-Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health (2016)**<sup>4</sup>: This report was commissioned by the Department of Health to inform the work of the National Inclusion Health Board. The report found that current and historical accommodation insecurity negatively impacts on Gypsies and Travellers physical and mental health. Effectively addressing accommodation insecurity/provision of sites will have a direct and positive 'knock-on' effect not just on community members' health, but also on the wider social determinants that impact on their intergenerational health and wellbeing (education, employment etc)

**The Equality and Human Rights Commission (2010)**<sup>5</sup> assessed local authorities' progress in meeting the accommodation needs of the Gypsy and Traveller communities found that it will take councils approximately 27 years to meet their five year pitch target requirements at the rate of progress achieved in 2006-2009.<sup>52</sup> The EHRC concluded that the overall rate of progress on site provision needs to increase more than fivefold to meet the five-year pitch shortfall, where pitches are provided with permanent planning permissions.

In conclusion therefore, the Runnymede GTAA confirms that there is an urgent and significant need for new pitches and plots in the Borough. The provision of the new permanent pitches and plots, as allocated through the Local Plan would help meet these identified needs. The Allocation Scheme SPD would help ensure that the allocated pitches were prioritised for those with a local connection to the Borough and initially, within this group, for Gypsies, Travellers

<sup>2</sup> [Lack-of-increase-in-affordable-pitches-report-Dec-2017-FINAL.pdf \(gypsy-traveller.org\)](#)

<sup>3</sup> [Gypsies, Travellers and accommodation. Briefing 10 \(raceequalityfoundation.org.uk\)](#)

<sup>4</sup> [Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health \(publishing.service.gov.uk\)](#)

<sup>5</sup> EHRC, 2010, Assessing local authorities' progress in meeting the accommodation needs of Gypsy and Traveller communities in England and Wales: 2010 update, Executive Summary, p.ix [RR68a Assessing Local G & T\\_EXEC\\_SUMM\\_FR.indd \(equalityhumanrights.com\)](#)



and Travelling Showpeople who meet one of the relevant planning definitions. In terms of data gaps, there is limited information in the GTAA on protected characteristics that it would be helpful to reference in this Equalities Assessment. There is also limited information on the financial circumstances of those with identified accommodation needs in the GTAA.

The remainder of studies analysed demonstrate the profound impacts that a lack of secure accommodation has on gypsy, traveller and showmen communities. On this basis, the provision of new permanent pitches and plots in the Borough and their allocation to Gypsies, Travellers and Travelling Showpeople who can demonstrate a local connection to the Borough is considered to have positive impacts on the protected characteristic of race. Given the clear links between insecure accommodation and impacts on the health and other indicators, it is recommended that the allocated pitches and plots are prioritised for those families who do not have a permanent authorised place to live, whether the pitches are market or affordable products. This ties in with the Council's duty to prevent or relieve homelessness.

**3. What consultation and involvement has been undertaken in relation to this (or a similar) policy, function or activity and what are the results? If none have been carried out, what consultation will be needed?** Data may be available from recent consultation activities on a related policy or Equality impact assessment.

A six week consultation on the draft Pitch and Plot allocation scheme took place in Autumn 2021 and has now concluded. Seven representations were received during the period of consultation and the comments made at a meeting with the Showmen's Guild and verbally by other members of the travelling community have also been summarised. A summary of the comments received is set out as follows:

1-Concern about lack of control. To that end, retention of ownership of the pitches by a public authority is essential. Effective control (enforcement), should the need arise, will be less troublesome dealing with a tenant rather than a landowner. RESPONSE: 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 be reflected in the S106 legal agreements for the allocated sites.

2-Concerns about speculators acquiring the pitches/plots. RESPONSE: The Allocation Scheme SPD has been designed to prevent speculators acquiring the allocated pitches/plots as they can only be acquired by those who are deemed to be eligible under the Allocation Scheme. S106 clauses/planning conditions can be used to help ensure that the pitches/plots are only occupied by eligible households.

3-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. We strongly support the creation of new sites, including ones placed on larger new housing sites. RESPONSE: Support welcomed.

4- If RBC decides to continue down the dubious path of private sale of these plots, stronger control of the ownership of the plots is requested (beyond what can be achieved through S106 agreements). RESPONSE: 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.

5-Understand that some families within the wider gypsy and traveller communities do not mix well. To avoid lack of harmony, a recognition of this in the allocation process is desirable. RESPONSE: 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 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 this point.

6-The consultation is hard to understand. Most Gypsies, especially the older generation do not read. Concern that subsequent allocation schemes have been unsuccessful in providing new pitches. RESPONSE: Efforts were made by the Council 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. 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.

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.

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.

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 allocation scheme and construction of pitches/plots can be relayed.

7-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.  
RESPONSE: Comments noted. Through its adopted Local Plan and Allocation Scheme SPD, the Council is seeking to increase the number of authorised and permanent pitches and plots in Runnymede for the travelling community.

8- For the market plots, the Council should introduce some form of prioritisation to recognise that some travellers are in more need for the new plots than others. Request that the Council gives priority to the following families in particular:

- 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;
- for Showmen, those who are currently unable to store and maintain their equipment on land that they own alongside their living accommodation.

RESPONSE: This Equalities Impact Assessment 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, 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.

9- Request that the Council should seek to verify that families who are applying for the pitches/plots do not actually own other land where they would have the ability to meet their own needs. RESPONSE: The application process will contain a "Disqualified Persons" criterion which will cover property ownership: *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.* On the application form, the question will be asked, "do you or have you ever owned property and/or land". The application form will confirm that if applicants are found to provide false or misleading documents that they will be disqualified. Furthermore, all applicants will be run through a fraud search at the time of their application. These measures will help ensure that those with land/property elsewhere are identified wherever possible.

10-Suggestion that anyone who acquires a pitch/plot should not be allowed to sell them on or sublet them for a specified period of time. Concerned about people trying to profit from the activity.

RESPONSE: The Allocation Scheme has been designed to prevent speculators acquiring the allocated pitches/plots as they can only be acquired by those who are deemed to be eligible under the allocation scheme. S106 clauses/planning conditions can be used to help ensure that the pitches/plots are only occupied by eligible households. This would include through future sub lets. Additional text has been added into the SPD to confirm this point.

11-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.

RESPONSE: Request noted. The draft application 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.

Please note that the above commentary may not respond to every comment made during the period of consultation, however a comprehensive summary of all comments received and a response to each will be published alongside the amended Allocation Scheme when it goes before the Planning Committee in the Council’s Statement of Consultation.

**4. Are there any gaps in the information established from the consultation and involvement undertaken and referred to in Part 3? If so, set out how these gaps will be filled?**

None identified in relation to equalities matters

Where it is not possible to fill information/data gaps in time to inform this assessment, specific action points will need to be included in the action plan section Part 10 below, with a focus on monitoring the actual impact of the policy function or activity.

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## ASSESSING IMPACT

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It is essential to consider not just the intended consequences of the policy but also any unintended consequences and barriers that might prevent it being effective for people within any of the Protected Characteristic groups.

Please use the Grid included below to assess the impact of the Policy/function/action on each of the Protected Characteristics. When completing the assessment, please bear in mind the following questions;

1. **What are the main findings of your consultation and involvement activities, and do they demonstrate problems that need to be addressed? For example, could the policy, function or activity outcomes differ according to people’s ethnic group, disability, gender, religion/belief, sexual orientation, or age?** For instance, there might be evidence of higher or lower participation/uptake by different groups.
  
2. **If there is a disproportionate impact on one group, is it appropriate and consistent with the objective?** For instance the policy may include lawful positive action or other methods to address particular needs or may be considered to be a proportionate means of achieving a legitimate aim

Protected Characteristic	Positive		Neutral	Negative		Comments
	High	Low		High	Low	
Age					√	<p>As has been identified through this Equalities Impact Assessment, there is concern that the Allocation Scheme SPD, by prioritising Gypsies and Travellers who meet the planning definition, could have a negative impact on older members of the Gypsy and Traveller communities who are less likely to travel for work (due to retirement for example). However the definitions being relied on are contained within national planning policy and it is those Gypsies and Travellers who lead a nomadic way of life that the PPTS requires the Council to prioritise in terms of meeting accommodation needs.</p> <p>It is considered relevant however that the Allocation Scheme SPD confirms that if there are not sufficient applicants with a local connection to Runnymede and who meet the planning definition for a traveller, the pitches and plots would then be used to provide culturally appropriate accommodation for Gypsies and Travellers with a</p>

					local connection who have ceased to travel permanently.
Disability		√			The permanent pitches and plots allocated in the Local Plan, and to which the Allocation Scheme SPD relates, are located in sustainable, urban area locations where residents will have better access to a range of facilities including healthcare facilities. This is considered to benefit those with disabilities, particularly when this is contrasted to members of the community who live a roadside existence or have insecure accommodation and who are likely to be disadvantaged in terms of having access to continuous, consistent healthcare.
Gender Reassignment		√			The permanent pitches and plots allocated in the Local Plan, and to which the Allocation Scheme SPD relates, are located in sustainable, urban area locations where residents will have better access to a range of facilities including healthcare facilities. This is considered to benefit those who are undergoing gender reassignment, particularly when this is contrasted to members of the community who live a roadside existence or have insecure accommodation and who are likely to be disadvantaged in terms of having access to continuous, consistent healthcare.
Marriage / Civil Partnership			√		It is considered that the Allocation Scheme SPD is likely to be a neutral impact for married couples or those in a civil partnership, as those applicants who are in these types of relationship will be treated in the same way as single people (including those who are divorced or widowed).
Pregnancy / Maternity		√			The permanent pitches and plots allocated in the Local Plan, and to which the Allocation Scheme SPD relates, are located in sustainable, urban area locations where residents will have better access to a range of facilities including healthcare facilities. This is considered to benefit those who are pregnant or have babies, particularly when this is contrasted to members of the community who live a roadside existence or have insecure accommodation and who are likely to be disadvantaged in terms of having access to continuous, consistent healthcare.
Race	√				It is considered that the Allocation Scheme SPD will have significant positive impacts for the protected characteristic of race by allocating new permanent pitches and plots to Gypsies and Travellers who can demonstrate a local connection to the Borough. Given the significant disadvantages that travelling communities face in a number of areas including in terms of their ability to access permanent, secure accommodation, the Allocation Scheme SPD will have a positive effect overall.

Religion / Belief		√			The permanent pitches and plots allocated in the Local Plan, and to which the Allocation Scheme SPD relates, are located in sustainable, urban area locations where residents will have better access to a range of facilities including religious venues. This is considered to benefit those who wish to share their beliefs and/or practice a religion with like-minded members of the community, particularly when this is contrasted to members of the community who live a roadside existence or have insecure accommodation and who are likely to be disadvantaged in terms of having settled domestic arrangements and regular access to places of worship/affiliated schools etc.
Sex			√		It is considered that the Allocation Scheme SPD is likely to have a neutral impact for the protected characteristic of sex as the scheme will treat men and women equally when they apply for a pitch or plot.
Sexual Orientation			√		It is considered that the Allocation Scheme SPD is likely to have a neutral impact for the protected characteristic of sex as the scheme will not distinguish between, or give preference/ disadvantage to any applicant based on their sexual orientation.

**5. Does the policy, function or activity miss potential opportunities to promote equality or positive attitudes to (and between) different Protected Characteristics or communities?**

No, it is considered that the Allocation Scheme SPD takes all available opportunities to promote equality and, based on the research carried out and which is presented in this assessment, improve relationships between the settled and travelling communities in the Borough.

## ADDRESSING THE IMPACT: ACTION PLANNING, MONITORING AND REVIEW

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**6. Does the policy, function or activity require reconsideration or amendment?** If not, explain the reasons for this conclusion. If an adverse impact has been identified, you will need to set out the justification for continuing the policy, function or activity or outline measures to mitigate the impact.

It is recommended, as set out earlier in this assessment, that the Allocation Scheme SPD is amended to:

-ensure that the SPD is clear that groups of Travellers (for example family groups) can acquire multiple pitches/plots on a site for their own occupation as long as all individual households are assessed by the Council to be eligible to acquire them at the time of their offer on an allocated pitch/plot.

-Include additional text to set out the Council's requirements when pitches and plots are proposed to be sub-let.

- To prevent the pitches and plots by speculators, and to retain control over the occupation of the pitches/plots, include additional text to confirm that, *'Local Plan Policy SL22 requires the Council to implement measures to ensure that the allocated pitches and plots are secured in perpetuity for Gypsies, Travellers and Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance). This wording in Policy SL22 means that the allocated pitches and plots will be prioritised initially and in the longer term for those Travellers who still lead a nomadic way of life specifically through travelling for employment purposes (even if travelling has paused for a temporary period), and for those who have a local connection to the Borough. To comply with these policy requirements, a suitably worded planning condition or obligation will be attached/secured for each of the allocated sites to secure the aims and objectives of Policy SL22 and this SPD. This condition/obligation would be enforceable by the Local Planning Authority if a breach occurs'*.

Whilst a potential minor adverse impact has been identified for the protected characteristic of age, the Council is following the national approach set out in the PPTS in relation to, *'setting pitch targets for Gypsies and Travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area'* (para 9). Annex 1 contains the relevant definitions which relate to travellers who lead a nomadic way of life or who have only stopped travelling temporarily. Whilst this could potentially disadvantage older/retired gypsies, travellers and travelling showpeople, the Allocation Scheme SPD has been amended to confirm that Gypsies and Travellers who have a local connection to the Borough but who have ceased travelling permanently would be priority B applicants who be offered the allocated pitches and plots if there was insufficient interest from members of the community who have a local connection to Runnymede and still lead a nomadic way of life. This approach is considered important as Romany Gypsies, Irish and Scottish Travellers may be able to claim a right to culturally appropriate accommodation under the Equality Act (2010). In addition, provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district/borough with respect to the provision of sites on which caravans can be stationed.



**7. What actions have you identified as a result of this equality impact assessment?** These might include improving data collection in order to give a clearer picture of your service-users, physical adjustments to a building, arranging for information to be sent out to individuals in alternative formats or languages, or consulting with a wider group of people to understand the impact of the policy.

The need to engage with the representative agencies for the Gypsy and Traveller communities in drafting the application form and any accompanying written material to maximise the chances of it being as accessible to as many members of the travelling community as possible.

This responds to comments made during the consultation period about the difficulties experienced in the gypsy and traveller communities with literacy. These comments are further supported by published studies including the CLG report titled Progress Report by the Ministerial Working Group on tackling inequalities experienced by Gypsies and Travellers(2012)<sup>6</sup> which found that in 2011, just 25% of Gypsy, Roma and Traveller pupils achieved national expectations in English and Mathematics at the end of their primary education, compared with 74% of all pupils. At the end of secondary education, just 12% of Gypsy, Roma and Traveller pupils achieved five or more good GCSEs, including English and Mathematics, compared with 58.2% of all pupils. Many Gypsies and Travellers leave the education system before the age of 16 with poor literacy and numeracy skills.

The Council will also offer assistance with the application process, recognising that some households may be reluctant to specify that they have literacy challenges.

In addition, once the application forms are about to go live, the Council will work with representative groups with the aim of disseminating information about the allocation scheme to members of the community by word of mouth, with phone numbers being provided for Council officers who can provide further detail.

Site visits to the Borough's unauthorised sites may be carried out where appropriate to discuss the Allocation Scheme SPD (either a Council officer or an appropriate person appointed by the Council) and make the community aware of the new provision coming forward in the Borough.

**8. Action Plan (where applicable): Who will be responsible for completing these actions and in what timescale? How will you review the actual impact of this policy function or activity?**

Provide details of timescale and actions for review, and details of how the actions will be evaluated to measure if expected outcomes are achieved in practice. You may have identified 'triggers' that would indicate a problem with the policy, function or activity and suggest a revision is be needed.

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<sup>6</sup> [Progress report by the ministerial working group on tackling inequalities experienced by Gypsies and Travellers \(publishing.service.gov.uk\)](http://publishing.service.gov.uk)

Once the Allocation Scheme SPD has been approved in its final form, its implementation will largely fall to the Council's Housing Allocations team. It is intended that the application process will be live in Spring 2023. Liaison with the representative groups regarding the format and contents of the application form and publicity of the scheme will take place prior to this.

Chapter 10 of the Allocation Scheme SPD provides information on equalities and monitoring, stating that,

*'The Council will seek to ensure that the allocation scheme set out in this SPD is being operated in a manner that is fair to all sections of the community regardless of nationality, ethnic origin, marital status, age, gender, sexual orientation, disability, gender reassignment, pregnancy/maternity and religion. The information provided will be kept confidential and treated with respect. The Council believes it is important to understand the different communities who apply for a pitches/plots and it is only by asking these questions can the Council check that it is operating a fair system.'*

*All applicants applying for a pitch/plot will be asked to provide equalities information. Provision of this information will not be obligatory and not a requirement for acceptance of an application. However, such information will help the Council monitor the number and types of equality groups seeking a pitch/plot and therefore applicants will be strongly advised to provide this information. Equalities records will be monitored regularly to ensure pitches/plots are being allocated fairly.*

*Allocation policies and any changes to them will be reviewed regularly to ensure they do not operate in ways that discriminate against or disadvantage any particular group'.*

Chapter 14 of the Allocation Scheme SPD also confirms the review mechanism for the Allocation Scheme SPD. The next review of the scheme is considered most likely to be required on the adoption of the next iteration of the Local Plan if additional pitches and plots are allocated for Gypsies and Travellers. The specific details of the monitoring process that will be put in place have not been identified at the time of writing this Equalities Assessment.

Furthermore, the Council will update its Gypsy and Traveller Accommodation Assessment approximately every 5 years. This will identify the accommodation needs of the Borough's Gypsies and Travellers and it will be possible to monitor the effectiveness of the Allocation Scheme SPD in terms of whether the level of need is falling in the Borough following the occupation of the allocated pitches and plots.

This assessment will need to be referred to the Equality Group for challenge.

**Date completed: 17.10.2022**

**Sign-off by an authorised Officer/Manager:**

**Runnymede Borough Council**

**Runnymede Pitch and Plot Allocation Scheme for Gypsies,  
Travellers and Travelling Showpeople  
Supplementary Planning Document (SPD)**

**Strategic Environmental Assessment (SEA)**

Screening Statement - Determination under Regulation 9 of the SEA Regulations 2004

**Habitats Regulations Assessment (HRA)**

Screening Statement – Determination under Regulation 105 of the Conservation of Habitats  
and Species Regulations 2017

October 2022

## **Introduction**

- 1.1. This draft Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening determination has been undertaken by Runnymede Borough Council in their duty to determine whether the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople: Supplementary Planning Document (SPD) requires SEA or HRA. This screening assessment is based on the draft SPD dated November 2022.
- 1.2. Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to determine whether or not a Strategic Environmental Assessment is required for certain plans, policies or programmes. This statement also sets out the Borough Council's determination as to whether Appropriate Assessment is required under Regulation 105 of the Conservation of Habitats & Species Regulations 2017.
- 1.3. Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plans that set the framework for the future development consent of projects or which require Appropriate Assessment must be subject to an environmental assessment.
- 1.4. There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- 1.5. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Borough Council must determine if a plan requires an environmental assessment. In accordance with Article 6 of the Habitats Directive (92/43/EEC) and Regulation 105 of the Conservation of Habitats & Species Regulations 2017, the Borough Council is the competent authority for determining if a plan requires Appropriate Assessment.

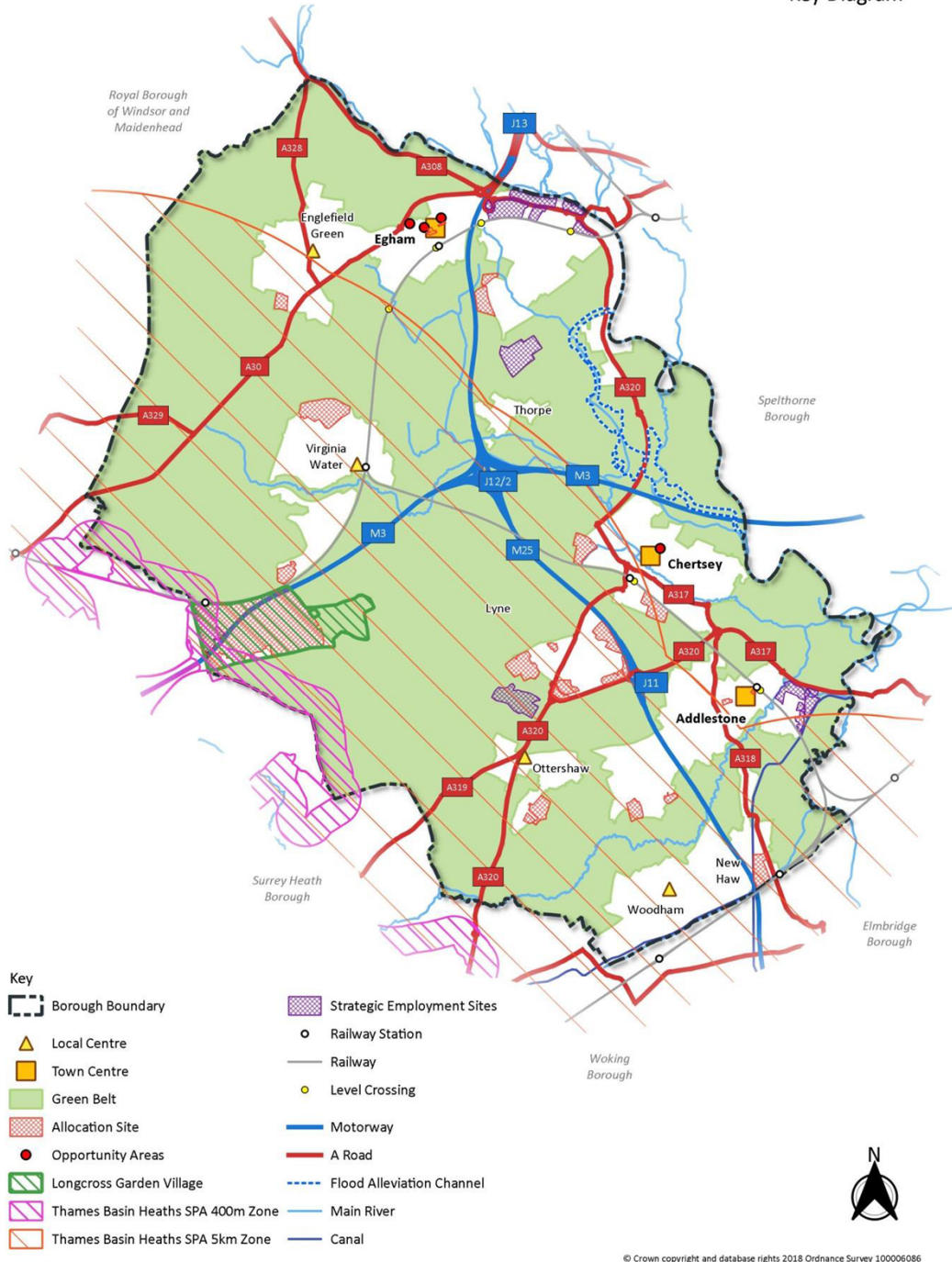
## **Background to the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD**

- 1.6. The Planning & Compulsory Purchase Act 2004 (as amended) makes provision for local authorities to prepare and adopt Local Development Documents which can include SPD's. However, an SPD does not form part of the Development Plan for an area as set out in Section 38 of the Planning & Compulsory Purchase Act 2004 (as amended) but it is a material consideration in taking planning decisions.
- 1.7. An SPD is required to be consulted on and adopted by the Borough Council and once implemented sets out additional planning guidance that supports and/or expands upon the Policies of a Local Plan.
- 1.8. The proposed Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD covers all of the area within the jurisdiction of Runnymede Borough Council and contains the urban areas of Addlestone, Chertsey, Englefield Green, Egham, Ottershaw, Woodham & New Haw and Virginia Water. Interspersed between the urban areas is designated Green Belt holding numerous wooded copses, golf courses and businesses as well as small pockets of development, agriculture and equestrian uses. The M25 and M3 motorways bisect the Borough north-south and east-west respectively and effectively cut the Borough into four quarters. There are six rail stations in Runnymede Borough offering direct

services to London Waterloo, Reading & Woking. A plan of the designated area is shown in Plan 1-1.

**Plan 1-1: Map of Runnymede Borough**

Runnymede Borough  
Key Diagram



1.9. There are numerous areas of woodland/copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat as well as

swathes of woodpasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include areas of lowland meadows, lowland heathland, and lowland fens. There are five SSSIs located in the Borough area, Basingstoke Canal, Langham Pond, Thorpe Haymeadow, Thorpe no.1 Gravel Pit and Windsor Forest.

- 1.10. Unit 2 of the Basingstoke Canal SSSI lies to the south of the Borough and is in an unfavourable, no change status which does not meet the PSA target of 95% in favourable or unfavourable recovering status. Status reasons are extent of habitat, lack of plant diversity and poor water quality.
- 1.11. Langham Pond SSSI is formed of 3 units. 100% of the SSSI is in a favourable or unfavourable recovering status, meeting the PSA target. The Thorpe Haymeadow SSSI is formed of one unit in a favourable condition, which also meets the PSA Target.
- 1.12. The Thorpe no.1 Gravel Pit SSSI is formed of one unit and is in a favourable condition status meeting the PSA target. The SSSI also forms part of the wider South West London Water Bodies Special Protection Area (SPA) and Ramsar, an internationally designated site for nature conservation importance.
- 1.13. The Windsor Forest SSSI is formed of 22 units with units 10, 11 and 16 within or partly within Runnymede. The SSSI is in 100% favourable condition status and meets the PSA target of 95%. The SSSI also forms part of the Windsor Forest & Great Park Special Area of Conservation (SAC) another internationally designated site for nature conservation importance.
- 1.14. Other internationally designated sites, whilst not within the Borough but within 5km include, the Thames Basin Heaths Special Protection Area and Thursley, Ash, Pirbright & Chobham SAC.
- 1.15. The Borough also lies within 12km of the Mole Gap to Reigate Escarpment SAC, 12.2km from Burnham Beeches SAC, 13km of the Richmond Park and Wimbledon Common SACs, 20km from the Chiltern Beechwoods SAC, 23km from the Wealden Heaths Phase I SPA and its component parts (including Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar) and 30km from the Wealden Heaths Phase II SPA.
- 1.16. There are also over 30 Sites of Nature Conservation Importance (SNCIs) in the Borough as well as two Local Nature Reserves at Chertsey Meads and Riverside Walk in Virginia Water. The Borough lies within the River Wey and Tributaries catchment and there are large areas of the Borough, including within its urban areas which lie within flood risk zones 2 and 3 including functional floodplain.
- 1.17. From a heritage perspective, the Borough contains numerous statutorily listed or locally listed buildings and structures most notably the Grade I Royal Holloway College building in Englefield Green. There are 6 Conservation Areas in the borough as well as 6 scheduled ancient monuments, 48 areas of high archaeological potential and four historic parks and gardens.
- 1.18. The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD does not form part of the Development Plan for the area and does not allocate any sites for development or propose policies for the use of land but is a material consideration in decision making. The 2030 Local Plan which is the document which allocates sites and contains policies concerning land use has been the subject of Sustainability Appraisal (including the requirements for Strategic Environmental Assessment) as well as Habitats Regulations Assessment (HRA).

- 1.19. Local Plan Policy SL22: Meeting the Needs of Gypsies, Travellers and Travelling Showpeople states the following:

*Where traveller pitches are required to be provided on sites allocated through this Local Plan, the Council will secure their delivery through the imposition of appropriate planning conditions or obligations attached to any planning approval granted. Those obligations will include an appropriate management agreement including measures to secure:*

- *Phasing of site delivery and trigger points to secure early delivery, proportionate to the site delivery;*
- *Measures to ensure the site is secured in perpetuity for Gypsies, Travellers or Travelling Showpeople (in accordance with the relevant definition from the Planning Policy for Traveller Sites, or any replacement guidance) as appropriate;*
- *A policy for Allocation (to preserve access for those with local connection); and,*
- *Further to Policy SL20, consideration of delivery of a proportion of the pitches or plots at below market rate, as affordable housing, based on evidence of need as set out in the Council's latest GTAA and viability at the time of the application. This consideration applies to both the provision of pitches or plots on site and in cases where provision is proposed off site.*

- 1.20. The Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD seeks to provide further guidance on how this part of the policy should be interpreted.

- 1.21. In particular, the Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD which has been drafted for public consultation the SPD seeks to provide further detailed guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward.

### **Sustainability Appraisal**

- 1.22. The Planning and Compulsory Purchase Act 2004 and associated Regulations (as amended), requires a local authority to carry out a Sustainability Appraisal (SA) for their Local Plan documents. This considers the social and economic impacts of a plan as well as the environmental impacts. SPDs are not Local Plan documents and therefore a Sustainability Appraisal is not required.

### **Habitats Regulations Assessment (HRA) – Screening**

#### **Assessment Process**

- 1.23. The need to undertake an Appropriate Assessment as part of an HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 105 of the Conservation of Habitats and Species Regulations 2017. The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.

- 1.24. The European Habitats Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. The Habitats Directive states that any plan or project not connected to or necessary for a site's management, but likely to have significant effects thereon shall be subject to appropriate assessment. There are four distinct stages in HRA namely: -

**Step 1: Screening** – Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant. Following the decision of the ECJ in the *People Over Wind & Sweetman v. Coillite Teoranta (C-323/17)* case, avoidance and/or mitigation measures cannot be taken into account at the screening stage and it is purely an exercise to determine if possible pathways for effect exist and whether these can be ruled out taking account of the precautionary principle. It is the opinion of this HRA screening assessment and in light of the Planning Practice Guidance Note on Appropriate Assessment that adopted policies of the current development plan cannot be taken into account at this stage of HRA where they are proposing mitigation for European Sites. Similarly, any HRA undertaken for other development plan documents which have not been through Examination in Public (EiP) and found sound should only be given limited weight. However, it is considered that greater weight can be attributed to screening undertaken in HRAs which support development plan documents found sound at examination. In this respect, this screening assessment takes account of the Runnymede 2030 Local Plan HRA where it indicates that effects can be screened out in the absence of avoidance/mitigation.

**Step 2: Appropriate Assessment** – consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential avoidance and/or mitigation measures.

**Step 3: Assessment of Alternative Solutions** – Assessing alternative ways of achieving the objectives of the plan/project which avoids impact, if after Step 2 significant effect cannot be ruled out even with avoidance or mitigation measures; and

**Step 4: Assessment of Compensatory Measures** – Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.

- 1.25. Should step 1 reveal that significant effects are likely, or effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effect even with avoidance and/or mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

### **Step 1 - Screening**

- 1.26. There are four stages to consider in a screening exercise: -

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;



Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects.

#### Stage 1

- 1.27. It can be determined that the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD is not directly connected with or necessary to the management of a European site.

#### Stage 2

- 1.28. Information about the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD can be found in paragraphs 1.6 to 1.21 of this screening assessment. Table 1-1 lists those other plans and projects, which may have in-combination impacts.

**Table 1-1: Other Key Plans/Projects**

<p><b>Plan/ Project</b></p>	<p><b>National Planning Policy Framework (2021):</b> High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p><b>South East Plan 2009:</b> Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p><b>London Plan 2021:</b> Contains planning policies for the development of land across the wider London area including housing and employment allocations with a target of 52,000 new homes per annum (2019/20 – 2028/29).</p> <p><b>Runnymede 2030 Local Plan:</b> Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 7,920 dwellings over the Plan period and allocations for residential, employment and retail development.</p> <p><b>Thorpe Neighbourhood Plan 2021:</b> Sets policies for development proposals which come forward within the Thorpe Neighbourhood Area.</p> <p><b>Other Local Authority Local Plans within 10km or adjoining sites identified in paras 1.8 to 1.12:</b> Housing target for areas around European sites set out in Table 1-2.</p> <p><b>Large Scale Projects within 10km or adjoining European Sites:</b> Large scale projects within 10km are subsumed in the consideration of ‘Other Local Authority Local Plans’ above.</p> <p><b>Thames Basin Heaths Joint Delivery Framework 2009:</b> Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p><b>Environment Agency, Thames River Basin District Management Plan (2015):</b> Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.</p> <p><b>Environment Agency, Thames Catchment Flood Management Plan (2009):</b> Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p><b>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019):</b> identifies the Wey having restricted ‘Water available for licensing’.</p> <p><b>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009):</b> Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
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**Table 1-2: List of Local Authority Housing Targets within 10km of European Sites**

Site	Local Plan Area	Housing Target
<b>Thames Basin Heaths SPA*</b>		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Runnymede Borough	7,920
	Elmbridge Borough	3,375
	Bracknell Forest Borough	11,139
	Windsor & Maidenhead	14,260
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	6,208
<b>Total</b>		<b>95,108</b>
<b>Windsor Forest &amp; Great Park SAC</b>		
	Runnymede Borough	7,920
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Spelthorne Borough	3,320
	Elmbridge Borough	3,375
	Windsor & Maidenhead Borough	14,260
	Bracknell Forest Borough	11,139
	Slough Borough	6,250
	South Bucks District	2,800
	LB Hillingdon	10,830
	LB Hounslow	17,820
<b>Total</b>		<b>85,918</b>
<b>South West London Water Bodies SPA &amp; Ramsar</b>		
	Runnymede Borough	7,920
	Elmbridge Borough	3,375
	Spelthorne Borough	3,320
	Epsom & Ewell Borough	3,620
	Mole Valley District	3,760
	Windsor & Maidenhead Borough	14,260
	Slough Borough	6,250
	Bracknell Forest Borough	11,139
	South Bucks District	2,800
	LB Hillingdon	10,830
	LB Hounslow	17,820
	LB Ealing	21,570
	LB Kingston	9,640
	LB Richmond	4,110
<b>Total</b>		<b>120,426</b>

\* Also includes the Thursley, Ash, Pirbright & Chobham SAC

### Stage 3

- 1.29. Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Runnymede Pitch and Plot Allocation Scheme for

Gypsies, Travellers and Travelling Showpeople SPD can be found in Tables 1-3 to 1-6 and 1-7. All other European Sites were screened out of this assessment at an early stage as it was considered that their distance from the Borough area meant that there is no pathway or mechanism which would give rise to significant effect either alone or in combination. In this respect regard has been had to the 2030 Local Plan HRA specifically paragraphs 2.1-2.2.

**Table 1-3: Details of Thames Basin Heaths SPA and Potential Effects Thereon**

European site:	Thames Basin Heaths Special Protection Area (SPA).
Site description:	The Thames Basin Heaths SPA was proposed in October 2000, and full SPA status was approved on 9 March 2005. It covers an area of some 8,274 ha, consisting of 13 Sites of Special Scientific Interest (SSSI) scattered from Surrey, to Berkshire in the north, through to Hampshire in the west. The habitat consists of both dry and wet heathland, mire, oak, birch acid woodland, gorse scrub and acid grassland with areas of rotational conifer plantation.
Relevant international nature conservation features:	Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season: <ul style="list-style-type: none"> <li>- Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);</li> <li>- Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997);</li> <li>- Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).</li> </ul>
Environmental conditions which support the site	<ul style="list-style-type: none"> <li>• Appropriate management</li> <li>• Management of disturbance during breeding season (March to July)</li> <li>• Minimal air pollution</li> <li>• Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species</li> <li>• Maintenance of appropriate water levels</li> <li>• Maintenance of water quality</li> </ul>
Potential Effects arising from the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

Showpeople SPD	
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**Table 1-4: Details of Thursley, Ash, Pirbright & Chobham SAC and Potential Effects Thereon**

International site:	Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)
Site description:	The Thursley, Ash, Pirbright & Chobham SAC covers an area of some 5,154 ha with areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water.
Relevant international nature conservation features:	The Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats. The qualifying Annex 1 habitats are: <ul style="list-style-type: none"> <li>- Wet heathland with cross-leaved heath</li> <li>- Dry heaths</li> <li>- Depressions on peat substrates</li> </ul>
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> <li>• Appropriate management;</li> <li>• Managed recreational pressure;</li> <li>• Minimal air pollution;</li> <li>• Absence or control of urbanisation effects such as fires and introduction of invasive non-native species;</li> <li>• Maintenance of appropriate water levels;</li> <li>• Maintenance of water quality.</li> </ul>
Potential Effects arising from the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

**Table 1-5: Details of Windsor Forest & Great Park SAC and Potential Effects Thereon**

International site:	Windsor Forest & Great Park SAC
Site description:	The Windsor Forest & Great Park SAC covers an area of some 1,680 ha with Atlantic acidophilus beech forests with Ilex and sometimes Taxus. It is one of four outstanding locations in the UK for oak woods on sandy plains and is one of only three areas in the UK for Limoniscus violaceus (violet click beetle).

Relevant international nature conservation features:	Annex I habitat of oak woods on sandy plain which is the primary reason for designation with Atlantic beech forests.
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> <li>• Loss of trees through forestry management</li> <li>• Urbanisation</li> <li>• Managed recreational pressure</li> <li>• Air Quality</li> </ul>
Potential Effects arising from the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

**Table 1-6: Details of South West London Water Bodies SPA & Ramsar and Potential Effects Thereon**

International site:	South West London Water Bodies SPA & Ramsar
Site description:	The South West London Water Bodies SPA & Ramsar covers an area of some 825 ha and is formed from 7 former gravel pits and reservoirs which support overwintering populations of protected bird species.
Relevant international nature conservation features:	Supports overwintering populations of:- Gadwall Shoveler
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> <li>• Managed recreational pressure</li> <li>• Water quality</li> <li>• Water abstraction</li> </ul>
Potential Effects arising from the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

Showpeople SPD	
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Stage 4

1.30. The consideration of potential effects is set out in Table 1-7.

**Table 1-7: Assessment of Potential Effects**

<p>Indirect effect from recreational disturbance and urbanisation.</p>	<p>The likely effects of recreational disturbance have been summarised in the Underhill-Day study for Natural England and RSPB (2005); this provides a review of the urban effects on lowland heaths and their wildlife. The main issues relating to the conservation objectives and the integrity of the SPAs and SAC's effected by recreational disturbance and urbanisation as a whole are: fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment), prevention of management, off-roading, vandalism and trampling.</p> <p>Natural England has advised that recreational pressure, as a result of increased residential development within 5km of the Thames Basin Heaths SPA &amp; Thursley, Ash, Pirbright &amp; Chobham SAC (or sites of 50 or more dwellings within 7km), is having a significant adverse impact on the Annex I bird species. Woodlark and Nightjar are ground nesting and Dartford Warblers nest close to the ground. They are therefore sensitive to disturbance, particularly from dogs, but also from walkers, and cyclists etc. They are, in addition, vulnerable to other effects of urbanisation, in particular predation by cats.</p> <p>Joint work involving Natural England and the authorities affected by the SPA/SAC have agreed a mechanism to avoid impacts to the SPA/SAC from recreational activities in the form of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management &amp; Monitoring (SAMM) and from the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA.</p> <p>In terms of the Windsor Forest &amp; Great Park SAC the Runnymede 2030 Local Plan HRA states that forestry management and recreational impacts has the potential for loss of trees and damage to trees from burning (arson).</p> <p>For the South West London Water Bodies SPA &amp; Ramsar threats arise through unmanaged recreational activities such as use of motorboats and fishing.</p> <p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates</p>
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	<p>to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward. However, the SPD does not in itself, allocate or safeguard any land for development that could give rise to increased recreation or urbanisation impacts.</p> <p>As such, there are no pathways for effect for impacts either alone or in-combination with other plans and projects and it is considered that the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD would not give rise to likely significant effects on any of the European Sites in terms of recreation or urbanisation, such that an Appropriate Assessment is required.</p>
<p>Atmospheric Pollution</p>	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, Thursley, Ash, Pirbright &amp; Chobham SAC or the Windsor Forest &amp; Great Park SAC, given the findings of the Council's air quality evidence.</p> <p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward. However, the SPD does not in itself, allocate or safeguard land for development.</p> <p>Overall, the SPD by itself or in-combination with other plans and projects is unlikely to give rise to significant effects on any of the European Sites in terms of air quality, such that an Appropriate Assessment is required.</p>



Water Quality & Resource	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effects to European sites as a result of water quality or abstraction.</p> <p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward. However, the SPD does not in itself, allocate or safeguard land for development.</p> <p>The SPD, either by itself or in-combination with other plans and projects is unlikely to give rise to significant effects on any of the European Sites in terms of water quality, such that an Appropriate Assessment is required.</p>
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## Conclusion

- 1.31. It is the conclusion of this updated HRA that following a screening assessment it can be ascertained, in light of the information available at the time of assessment and even in the absence of avoidance and mitigation measures that the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD **will not** give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects. Given the findings of the screening assessment it is considered that a full appropriate assessment is not required.

## Strategic Environmental Assessment-Screening

### The Assessment Process

- 1.32. The process for determining whether or not an SEA is required is called 'screening'. For some types of plan or programme SEA is mandatory and includes the following:
- Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
  - Plans which have been determined to require an assessment under the Habitats Directive (this has already been screened out as set out in paragraph 1.31 above).
- 1.33. However, the main determining factor when considering whether a plan or programme requires SEA is whether it will have significant environmental effects.

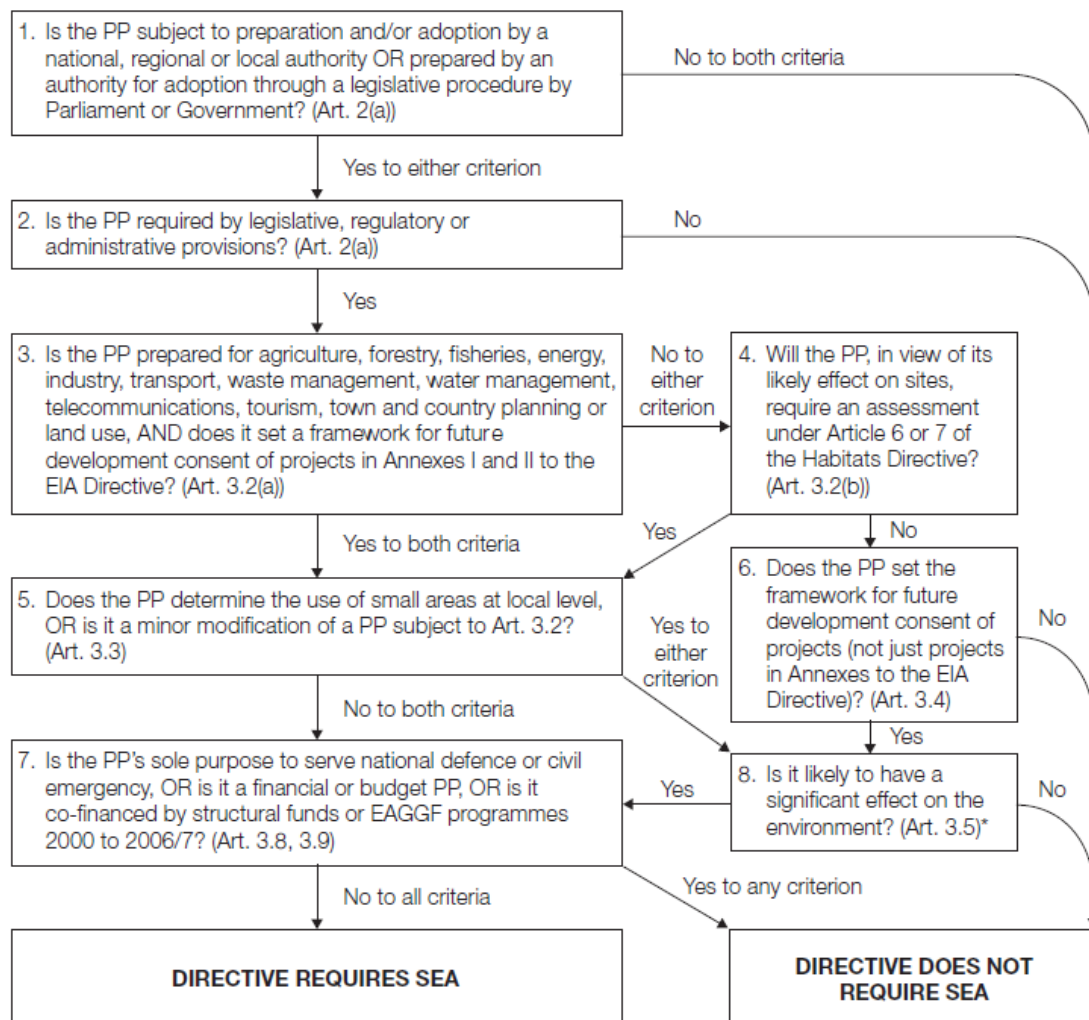
- 1.34. Within 28 days of making its determination, the determining authority must publish a statement, such as this one, setting out its decision. If it is determined that an SEA is not required, the statement must include the reasons for this.

This Screening Report sets out the Council’s determination under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not SEA is required for the Runnymede SPD. The Borough Council must consult with the three statutory bodies (Environment Agency, Historic England, Natural England) and take their views into account before issuing a final determination.

- 1.35. The determination is based on a two-step approach, the first of which is to assess the plan against the flowchart as set out in government guidance A Practical Guide to the Strategic Environmental Assessment Directive<sup>1</sup>. The flow chart is shown in Figure 1.

**Figure 1:**

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



<sup>1</sup> A Practical Guide to the SEA Directive [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274047/SEA-Directive-Practical-Guide.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274047/SEA-Directive-Practical-Guide.pdf). \*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

- 1.36. The second step is to consider whether the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD will have significant environmental effects when considered against the criteria set out in Annex II of the Directive and Schedule I of the Regulations. The findings of step 1 and step 2 are shown in Tables 1-9 and 1-10.

**Table 1-9: SEA Screening Step 1**

Stage in Flowchart	Y/N	Reason
1. Is the plan/programme subject to preparation and/or adoption by a national, regional or local authority or prepared by an authority for adoption through a legislative procedure by parliament or Government? (Article 2(a))	Y	The provision to prepare and adopt a Local Development Document is given by the Planning & Compulsory Purchase Act 2004 (as amended). The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD will be prepared and adopted by Runnymede Borough Council. The preparation and adoption procedure is set out in the Town & Country Planning (Local Development)(England) Regulations 2012. Whilst not forming part of the Development Plan the SPD will be a material consideration in planning decisions. <b>Move to Stage 2</b>
2. Is the plan/programme required by legislative, regulatory or administrative provisions? (Article 2(a))	N	There is no mandatory requirement to prepare or adopt Supplementary Planning Documents and if adopted it will not form part of the Development Plan for Runnymede. <b>As answer is No, flowchart identifies end to screening process, but move to Stage 3 for completeness.</b>

Stage in Flowchart	Y/N	Reason
3. Is the plan/programme prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	N	Whilst the plan is prepared for town & country planning, the SPD does not set the framework for future development consents for projects in Annex I or II to the EIA Directive.  <b>Move to Stage 4.</b>
4. Will the plan/programme, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))	N	The HRA screening undertaken in paragraphs 1.23 to 1.31 of this assessment has determined that Appropriate Assessment is not required. <b>Move to Stage 6.</b>
5. Does the plan/programme determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Article 3.3)	N/A	The SPD will not form part of the Runnymede Development Plan and does not therefore determine the use of small areas at a local (or any) level.  The plan is not a minor modification of an existing plan.  <b>Move to Stage 6</b>
6. Does the plan/programme set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	N	The SPD does not allocate any land or sites for development or set a framework for future development consents.  <b>As answer is No, flowchart identifies end to screening process, but move to Stage 8 for completeness.</b>
7. Is the plan/programme's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF	N	The sole purpose of the SPD is not to serve national defence or civil emergency. It is also not a budget plan or programme.

Stage in Flowchart	Y/N	Reason
programmes 2000 to 2006/7? (Article 3.8, 3.9)		
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	Effects on the environment and whether these are significant are considered in Table 1-10. <b>No Significant Effects identified in Table 1-10, so determine that SEA is not required.</b>

**Table 1-10: SEA Screening Step 2**

<b>Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)</b>		<b>Response</b>	
<b>Characteristics of the plan or programme</b>			<b>Significant Effect?</b>
(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD does not set out policies against which development proposals in the Runnymede area will be considered, although it will be a material consideration in decision making.</p> <p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward.</p> <p>The SPD will be applied as guidance rather than policy and as such it does not set a distinct framework for projects or other activities.</p>		N
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD does not influence other plans or programmes but is itself influenced by other plans (i.e. the Runnymede Local Plan and the NPPF). It does not influence any plans in a hierarchy.</p>		N

<b>Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)</b>	<b>Response</b>	
(c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	<p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward.</p> <p>It is the Runnymede 2030 Local Plan itself which has set the development allocations for Runnymede. Through the Examination of the Local Plan, the allocations have been found to be sound, and in accordance with the NPPF which has at its heart, the presumption in favour of sustainable development.</p> <p>As the SPD does not allocate any land for development, its impact to the integration of environmental considerations could not in itself, be regarded as significant.</p>	N
(d) Environmental problems relevant to the plan or programme.	<p>Environmental problems include potential recreational or urbanising impacts, atmospheric pollution and water resources to European sites. Paragraphs 1.23 to 1.31 of this assessment set out the effects of the SPD on European sites and has determined no significant effects.</p>	N
(e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the	<p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople is considered to have limited relevance to the implementation of Community legislation on the environment.</p>	N

<b>Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)</b>	<b>Response</b>	
environment (for example, plans and programmes linked to waste management or water protection).		
<b>Characteristics of the effects and of the area likely to be affected</b>		
(a) The probability, duration, frequency and reversibility of the effects.	<p>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward.</p> <p>It does not however allocate any land or sites for development or go beyond the requirements of the 2030 Local Plan. Therefore the probability of any effect is low. Duration of any effects would likely be long term (beyond 2030) given that there is an expectation in the Local Plan that one established, the traveller pitches/plots will be safeguarded, with their loss to other uses resisted unless it can be demonstrated that there is a surplus of traveller pitches and plots for Gypsies and Travellers in the Borough. Effects are expected to be generally positive but unlikely to be easily reversible. On the whole, effects are not considered to be significant.</p>	N
(b) The cumulative nature of the effects	The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and	N



Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	<p>Travelling Showpeople SPD provides further detailed guidance on how the part of Policy SL22 which relates to sites already allocated in the Runnymede 2030 Local Plan, and which will contain traveller pitches/plots, should be interpreted. In particular it provides guidance on how the Council will assess whether an applicant has a local connection to the Borough and sets out how the Council will assess if an applicant meets the planning definition of a Gypsy, Traveller or Travelling Showperson (as contained in the Planning Policy for Traveller Sites (PPTS) (2015). The SPD sets out how applicants will be prioritised for the allocated pitches and plots, with further detailed guidance being provided for any affordable pitches and plots which come forward.</p> <p>The SPD does not allocate or safeguard any land for development.</p> <p>In combination with the assessed impacts of the Runnymede 2030 Local Plan and the mitigation measures set out therein, it is considered that the cumulative effects of the SPD remain low and not significant.</p>	
(c) The transboundary nature of the effects	Given the scope of the SPD it is considered that no transboundary effects will arise.	N
(d) The risks to human health or the environment (for example, due to accidents)	None.	N
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD will cover the whole of the geographic area of Runnymede in Surrey. The area covered is 78km <sup>2</sup> with a population of around 83,448. Given the nature of the SPD it is considered that effects will not be significant.	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
<p>(f) The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> <li>i) Special natural characteristics or cultural heritage;</li> <li>ii) Exceeded environmental quality standards or limit values;</li> <li>iii) Intensive land-use.</li> </ul>	<p>Given the nature of the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD:</p> <p>i) The area covered by the SPD contains 5 SSSIs with the majority in a favourable condition status which meets the PSA target of 95% in favourable or unfavourable recovering condition status. The Basingstoke Canal SSSI is in an unfavourable no change status which does not meet the PSA target. The Runnymede area contains numerous statutorily or locally listed buildings and structures as well as conservation areas, scheduled ancient monuments and areas of high archaeological potential. The area is a mixture of urban and Green Belt and contains features such as green spaces, wooded copses and golf courses. However, the SPD does not in itself allocate any land for development and therefore significant effects on natural characteristics and cultural heritage are unlikely.</p> <p>ii) There are two Air Quality Management Areas (AQMAs) in the Runnymede area, along the entire length of the M25 which runs through the Borough and the other in Addlestone at the High Street and Station Road junction. Air quality standards are exceeded at 5 air quality monitoring sites in the Runnymede area<sup>2</sup>. The Environment Agency has identified the Wey catchment as having restricted water available for licensing.</p> <p>However, the SPD does not in itself allocate any land for development and therefore significant effects on air quality and water availability/quality are unlikely.</p> <p>iii) Intensive land use occurs in the urban areas (built development), but the SPD does not in itself, allocate any land for</p>	<p>N</p>

<sup>2</sup> Runnymede 2017 Air Quality Annual Status Report (2017) RBC, Available at: <https://www.runnymede.gov.uk/airquality>

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	development. As such significant effects are unlikely.	
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	The effects on European Sites for Nature Conservation are dealt with in (d) above. There are no landscapes which have recognised national, community or international protection status in the Runnymede area.	
<b>Conclusion</b>	<b>The Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD is unlikely to give rise to significant environmental effects and as such an SEA is not required.</b>	

1.37. On the basis of the Screening process it is determined that the Runnymede Pitch and Plot Allocation Scheme for Gypsies, Travellers and Travelling Showpeople SPD does not require a SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because: -

- The SPD is unlikely to give rise to significant environmental effects given that it does not allocate sites for development; and
- The content of the SPD when taken as a whole and in combination with policies in the emerging 2030 Local Plan will not give rise to significant effects.

1.38. This assessment was made on the 17<sup>th</sup> October 2022.