**SGTCF**

**SURREY GYPSY TRAVELLER COMMUNITIES FORUM**

(Founded 1996)



www.sgtcf.uk

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 25th August 2016

Planning Policy Team,

Runnymede Borough Council,

Runnymede Civic Centre,

Station Road,

 Addlestone,

Surrey,

KT15 2AH

Dear Mr Ford,

Runnymede 2035: Issues, Options and Preferred Approaches consultation, July 2016

Thank you for giving the Surrey Gypsy Traveller Communities Forum (SGTCF) the opportunity to comment on the above Plan. There is a pressing need to meet the accommodation requirements for Gypsies and Travellers within the Borough. Whilst there is some acknowledgement of this in the document, the Forum is extremely concerned about the inadequacy of reference to the needs of Gypsies and Travellers and their contribution to the local community. The document states that ‘Runnymede has a well-established traveller population and has one of the highest proportions of travellers in England and Wales’. Given this fact, we would expect much more attention to be given to Gypsies and Travellers throughout the document and reference to their needs should form an important thread from the Borough’s vision through to site allocation. This is fundamental to sound planning as well as the delivery of community cohesion.

The SGTCF is willing to assist in any way we can in order to increase participation and awareness of planning issues within the Gypsy and Traveller Community.

The SGTCF would like to submit the following comments in response to your Issues, Options and Preferred Approaches consultation, July 2016.

CHAPTER 2: LEGISLATIVE AND PLANNING POLICY CONTEXT

1. Planning policy for traveller sites- August 2015- DCLG. Your document makes no reference to this national planning policy. Not only is this a serious omission but, later on in the document, para 5.9 makes reference to an earlier national planning document published in March 2012 which has now been superseded. This error should be rectified in the next version of the plan.

CHAPTER 3: PORTRAIT OF RUNNYMEDE

1. Runnymede has a well-established Traveller population and has one of the highest proportions of Travellers in England and Wales, yet the portrait of the Borough fails to make any reference to this fact. Gypsies and Travellers are an important part of the local community and have been for many years. This should be acknowledged within the portrait of Runnymede. This matter should be addressed in the next version of the plan.
2. Para 3.7. Given that Runnymede has one of the highest proportions of Travellers in England and Wales, figures from the 2011 census should be included here. This should be added to the next version of the plan.
3. SWOT analysis- there is no mention of Gypsies and Travellers either as a strength, weakness, opportunity or threat. Given that there is reference to the need for 188 additional pitches over the next 15 years, we consider that this is a serious oversight. This should be addressed in the next version of the plan.

CHAPTER 4: SPATIAL VISION, OBJECTIVES AND STRATEGY

1. It’s important that Gypsies and Travellers are recognised as part of the local population. Therefore, it is considered that opportunities to provide for their accommodation needs should be maximised as with other forms of housing in the objectives ‘Supporting local people’ (para. 4.5). This should be addressed in the next version of the plan.
2. Evidence base. This section fails to make any reference to the TAA. Given that the provision of 188 pitches over the next 15 years is not insignificant- it should.
3. Given that there is no reference to the need to consider the provision for Gypsy and Traveller accommodation and the associated need for land, it is difficult to see how options can be assessed when the assessment for the demand for land is incomplete. Whilst it is not within our remit to comment on the scale of housing provision generally, we fail to see why other boroughs would willingly address any lack of provision by Runnymede. We would strongly oppose such an approach should it be applied to any under provision for Gypsies and Travellers. However, clearly we cannot comment because there is no mention of provision for Traveller sites so we do not know what your intentions are.

CHAPTER 5: HOUSING

1. Para 5.9 makes reference to out of date planning guidance relating to Gypsies and Travellers.
2. Para 5.10 needs updating as some Surrey Authorities have revisited their methodology for assessing the accommodation needs.
3. Whilst the SGTCF support the reference to the needs of Gypsies and Travellers contained in paragraphs 5.28 to 5.30, we believe that their need merits significantly more attention. Reference to their needs and the implication on the provision of land should feature as a strong thread throughout the document.
4. Issue H4. The SGTCF support the preferred option H4/03.

CHAPTER 12: FLOODING

1. Para 12.17 should make specific reference to the number of Gypsy and Traveller homes and pitches that were flooded in 2013/14 as many homes and families were affected.
2. When considering the provision of new sites for Gypsies and Travellers, it’s important that these are not located in high flood risk areas where general housing would normally not be permitted. It is also important that any flood remediation measures should benefit existing Gypsy and Traveller sites.

Appendix 1

1. Whilst options for housing and employment sites have been assessed in the Sustainability Appraisal, there is no appraisal for Gypsy and Traveller sites. This is a serious omission.

We hope that you find the above comments helpful and the next version of the plan will make a much stronger reference to the Gypsy and Traveller Community who are well established in Runnymede and significantly more attention is given to meeting their future accommodation needs.

Yours sincerely,

Ann Wilson MBE,

Surrey Gypsy Traveller Communities Forum