

Traveller Local Plan (TLP)

Issues & Options (Regulation 18) Consultation Statement

September 2024

www.enfield.gov.uk



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Executive summary

This statement provides a summary of the Traveller Local Plan (2023) consultation which ran from September 29 to November 10, 2023. The six-week consultation met the statutory minimum and the requirements of the adopted Statement of Community Involvement in planning (2023).

To promote the consultation:

- Notifications letters were sent to 3,878 from the Enfield Local Plan consultation database.
- A dedicated web page hosted key consultation documents and provided participation details and information about drop-in session. Throughout the consultation period, the web page was regularly updated with the latest information.
- Posters and flyers were distributed across Enfield hub libraries and community hubs.
- Hard copies for the consultation documents were distributed across Enfield hub libraries
- A digital advertising campaign was launched on Facebook, Twitter, and LinkedIn which targeted residents, workers, and students in Enfield.
- The Council's newsletters widely promoted the consultation.
- Print adverts were placed in local newspapers in English, Greek, and Turkish.

Specific efforts targeted 'hard-to-reach' groups, particularly the Gypsy and Traveller communities, through focused outreach led by the Council's liaison officer for Gypsy and Traveller communities, and targeted digital advertising. A drop-in session at the Council office attracted a small number of local residents, and members of the Traveller community.

The consultation received twelve responses from statutory consultees, Duty to Cooperate bodies and specific consultation bodies, the London Gypsies and Travellers interest group and three representations from local planning authorities under the Duty to Cooperate.

Although the overall response level was lower than expected, this was anticipated. We expect a significantly higher level of feedback during the next consultation of the Traveller Local Plan in Autumn 2024, which will focus on site allocations and policies. Nonetheless, we were pleased with the engagement at the consultation drop-in session, particularly the participation from the Travelling community which we consider a significant success, given that it is a 'hard to reach' group.

The comments primarily raised concerns about the need for inclusive and comprehensive planning for Traveller sites, flood risk management, historic environment protection, crime and community safety, and collaboration with relevant authorities and community groups.

The key themes identified were:

- Inclusive consultation with Gypsy and Traveller residents and community groups.
- Emphasis on flood risk assessment and appropriate site location to mitigate constraints.

- Consideration of historic environment issues and incorporation of relevant historic preservation guidelines.
- Addressing unauthorized encampments and illegal occupations to reduce crime and enhance community safety.
- Support for policies enabling the provision of Travelling Showpeople sites and maintaining communication with crime prevention teams.
- Ensuring affordable, culturally suitable accommodation with key design requirements.

These insights will inform the development of the next local plan, specifically by:

- Enhancing consultation processes to involve Gypsy and Traveller communities and relevant stakeholders from the early stages.
- Integrating detailed flood risk assessments and criteria in site selection methodologies to ensure safe and suitable site locations.
- Including policies and references to historic environment protections and involving conservation experts in planning stages.
- Developing strategies to manage unauthorized encampments and enhance site security in collaboration with law enforcement agencies.
- Formulating policies to support Travelling Showpeople and exploring collaborative site management with neighbouring authorities.
- Ensuring the provision of affordable, culturally appropriate housing that meets the specific needs of Gypsy and Traveller communities, including considerations for sustainable and accessible design.

In response to the Council's outreach for assistance with Traveller accommodation needs, neighbouring authorities provided the following response:

- Essex County Council (ECC) clarified that it is not responsible for housing and planning for Gypsies, Travellers, and Travelling Showpeople, recommending direct engagement with Essex District and Borough Councils.
- London Borough of Redbridge indicated that it cannot assist due to its own limited capacity and a potential deficit in Traveller accommodation going forward.
- London Borough of Newham also stated its inability to help, citing challenges in meeting their housing targets and pitch needs outlined in their Regulation 18 Local Plan.

These responses highlight the constraints faced by neighbouring authorities and the necessity for Enfield to address its Traveller accommodation needs independently within its own planning framework.

For the call for sites, the Councils Property Service submitted Bulls Cross Nursery and Durant's Park, and later proposed seven additional Council-owned sites, totaling nine. The London Borough of Haringey initially submitted a site for consideration; however this was later withdrawn.

1. Introduction

- 1.1 The Council has prepared a Traveller Local Plan (TLP) to explore the Issues and Options relating to the provision of sites to meet the needs of the Traveller communities in the Borough.
- 1.2 As part of this process, the Council conducted a consultation on the Traveller Local Plan Issues and Options (2023)¹ document which formed the first stage in plan-preparation. This consultation included the following supporting documents, Integrated Impact Assessment (July 2023), Updated Traveller Site Selection Methodology (September 2023), Gypsy and Traveller Accommodation Needs Assessment (October 2020) and Equalities Impact Assessment (June 2020)².
- 1.3 Additionally, a call for sites was undertaken and both adjoining and nearby planning authorities were contacted under the Duty to Cooperate to ask if they could assist London Borough of Enfield in addressing the identified needs for Traveller accommodation.
- 1.4 The consultation ran from September 29 to November 10, 2023, in accordance with Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012, as amended.
- 1.5 This consultation statement outlines the Council's consultation process, the outcomes of the methods used, the feedback received and the Council's response. This information will guide the next stage of the placemaking process, support decision-making and justify the preferred options.
- 1.6 A total of twelve responses were received during the Regulation 18 Issues and Options consultation. This report has been produced in accordance with Town and Country Planning (Local Development) (England) Regulations 2012 (Clause 22) (1) (c) (i-iv)³. This states that a Consultation Statement has to be produced to show:
 - The bodies and persons that the London Borough of Enfield invited to made representations under Regulation 18;
 - The methods by which these bodies and persons were invited to make representations under Regulation 18;
 - A summary of the main issues raised by the representations made pursuant to Regulation 18; and
 - How any representations made pursuant to regulation 18 have been considered and addressed.

¹ [Traveller Local Plan \(enfield.gov.uk\)](https://enfield.gov.uk/traveller-local-plan)

² [Emerging plans | Enfield Council](#)

³ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2746/regs/18)

- 1.7 The Consultation Statement will assist the Inspector during the Examination in determining if the Traveller Local Plan adhered to the requirements for public participation and government guidance.
- 1.8 This report demonstrates that the borough's consultation process complied with the statutory requirements outlined in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18).
- 1.9 Furthermore, it shows that public involvement was conducted in accordance with the approach specified in the Statement of Community Involvement (SCI) in Planning (2023)⁴.

2. Consultation overview

- 2.1 Local planning authorities have significant flexibility in conducting the initial stages of plan production, as long as they comply with the specific requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Local Plan Regulations') regarding consultation and adhere to the commitments outlined in an adopted Statement of Community Involvement (SCI) in Planning.

Consultation methods and outcomes

- 2.2 The consultation was promoted through various channels, including:
 - Formal notifications of the consultation were sent via email or letter using the Council's plan-making team's mailing list. This list includes local residents, businesses, developers, agents interested in planning updates, and statutory consultees as defined in the 2012 Act. In total, 3,878 individuals and organisations from the Enfield Local Plan consultation database were contacted.
 - A dedicated web page within the Council's website publicised the TLP Issues and Options document (Regulation 18) and accompanying documentation. This page provided immediate access to the consultation documents, details on how to get involved and information about drop-in session. During the consultation period the web page was regularly updated with the latest information.
 - Hard copies of the consultation documentation were available at the Council office and Enfield hub libraries.
 - Digital newsletters featured the Traveller Local Plan in the "News from the Council" newsletter on 18 October 2023, to raise awareness of the Traveller Local Plan consultation event and questionnaire.

⁴ The [SCI](#) outlines the approach to consultation stages throughout the preparation of the Local Plan. It sets out how the community should be engaged in the Local Plan process and at what stages that involvement should take place.

- Posters and flyers were produced, printed, and distributed to Enfield Council libraries and community hubs.
- Advertisements of the Traveller Local Plan were published in the Enfield Independent, Parikiaki, and Avrupa.
- Communication messages were shared across three Enfield Council social media platforms.
- Specific engagement targeted 'hard-to-reach' groups, particularly the Gypsy and Traveller communities, through outreach by the Council's liaison officer and targeted digital advertising.
- A drop-in session held at the Council office was attended by a small number of people, consisting of some local residents (including council employees) and members of the Traveller communities.

3. Responses to the consultation

3.1 All representations received, including those under the Duty to Cooperate, were from the following:

- National Highways
- Transport for London
- Historic England
- Greater London Authority
- Canal and River Trust
- London Gypsies and Travellers
- Metropolitan Police, Environment Agency
- Essex County Council, London Borough of Haringey
- London Borough of Redbridge
- London Borough of Newham

Methods of responding to the consultation

3.2 The respondents used the following methods to respond to the consultation:

- Twelve responses were received, all by email. This includes submissions of sites, which were also sent by email.
- No responses were received from the general public.
- The majority of the responses received did not complete the consultation questionnaire. London Gypsies and Travellers were the only respondents

who completed the entire questionnaire. Although, some email responses addressed specific questions we had raised within the questionnaire.

Summary of the representations

3.3 The key issues raised by the consultation respondents are set out below, along with details of who raised the issue and a council response.

Table 1: Full schedule of representations made and the Council's response

Rep no	Respondent	Summary of the comments	Council response
001	National Highways	<ul style="list-style-type: none"> National Highways mentioned that they would be concern with proposals and policies that potentially impact the safe and efficient operation of the SRN, particularly the M25, in this consultation. They also noted that they will assess transport implications of individual proposals during the local plan development and request to be kept informed of future progress. 	<ul style="list-style-type: none"> The Council acknowledges the concerns and will ensure that National Highways is kept informed of the progress of the Local Plan. Transport implications will be assessed as part of the development process.
002	Transport for London	<ul style="list-style-type: none"> Transport for London welcomed the references in section 3.2 to areas with adequate access to public transport, community facilities (schools, health centres, shops) and active travel routes. They recommend adding active travel connections, improved public realm, and landscaping to the design requirements list in section 4.25. They also noted that parking requirements should align with London Plan policies and include provisions for cycle parking and disabled persons parking. 	<ul style="list-style-type: none"> The Council appreciates the support and will incorporate the recommendations into the design requirements. Parking provisions will be aligned with London Plan policies, including those for cycle and disabled parking.

Rep no	Respondent	Summary of the comments	Council response
003	Historic England	<ul style="list-style-type: none"> • Historic England, broadly welcomes the draft Traveller Local Plan (TLP) and supporting documents. • They support the methodology and in particular its consideration of historic environment issues. • They highlighted that while their comments are limited to the Integrated Impact Assessment Scoping Report, relevant plans, policies and programmes related to the historic environment document should reference the following: <ul style="list-style-type: none"> - Historic England Advice Note 8 – Site Allocations; - the Planning (Listed Buildings & Conservation Areas) Act 1990; - the Ancient Monuments & Archaeological Areas Act 1979; - the London Plan 2021 – Policies D3 Optimising Site Capacity through the design-led approach and HC1 Heritage conservation and growth; and - the London Borough of Enfield Heritage Strategy along with relevant conservation area appraisals and management strategies. • A strong involvement of the conservation team and archaeological advisors is also advised, throughout the preparation of the Sustainability Appraisal of the emerging Local Plan. • They also mention that these advisors are best placed to: <ul style="list-style-type: none"> - Address local historic environment issues and priorities, including access to data held in the HER (formerly SMR). - Tailor policies or proposals to minimize potential adverse impacts on the historic environment. - Design required mitigation measures. 	<ul style="list-style-type: none"> • The Council acknowledges the recommendations and will ensure that relevant historic environment documents are referenced. • Conservation and archaeological advisors will be involved in the preparation of the Integrated Impact Assessment. • The Council will consider Historic England’s advice in relation to specific proposals.

Rep no	Respondent	Summary of the comments	Council response
		<ul style="list-style-type: none"> - Identify opportunities for securing wider benefits for the future conservation and management of heritage assets. • Lastly, they noted that their advice is based on the information provided and does not affect the obligation to advise on, and potentially object to, any specific development proposal that may subsequently arise from these documents and may have adverse effects on the environment. 	
004	Greater London Authority	<p>Greater London Authority suggested the following amendments:</p> <ul style="list-style-type: none"> • To update Table 4.1, p14 to align with the London Plan 2021 by removing 'adopted' and 'local,' and revising to "The TLP would align with the London Plan 2021 (which covers the period 2019 – 2041). • To determine if the TLP should address the needs of both Travellers who continue to travel (21 pitches) and those who culturally identify as Travellers but do not travel (an additional 2 pitches), totaling 23 pitches, to ensure a more inclusive approach. • To consider exploring negotiated stopping places in consultation with neighboring authorities, as there is a demonstrated need for these. • To assess whether additional planning policies are necessary for Traveller provision, noting that London Plan Policy H14 D emphasises the need to protect existing pitch capacity and ensure new residential developments create inclusive and balanced communities. 	<ul style="list-style-type: none"> • The Council will update Table 4.1 as suggested and consider the needs of both travelling and non-travelling Travellers. • The need for negotiated stopping places and additional planning policies will be explored further in the Local Plan development.
005	Canal and River Trust	<ul style="list-style-type: none"> • The Canal and River Trust noted that based on the documents and information available, the Trust has no specific comments regarding the evidence base or the criteria-based approach, which appear 	<ul style="list-style-type: none"> • The Council acknowledges the request and will reconsult the Canal and River Trust at the next stage of the plan.

Rep no	Respondent	Summary of the comments	Council response
		<p>reasonable.</p> <ul style="list-style-type: none"> • However, they would like the opportunity to review the potential impacts of any sites within their notified area, particularly concerning land stability, access, landscaping, and drainage. They request to be reconsulted at the next stage of the plan. It should be noted that these comments do not preclude raising further issues as the plan or document develops 	<ul style="list-style-type: none"> • Potential impacts on land stability, access, landscaping, and drainage will be considered.
007	London Gypsies and Travellers	<p>London Gypsies and Travellers highlighted the following key aspects within the questionnaire:</p> <ul style="list-style-type: none"> • Gypsy and Traveller residents, especially those interested in living on a site, as well as nomadic individuals and families in the borough, should be closely consulted throughout the TLP process. Community and interest groups near potential sites should also be engaged early to foster positive relationships and understanding. • The London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) commissioned by the GLA should be considered in the next stage of TLP preparation. • Given the discriminatory nature of the PPTS 2015 definition of Travellers found by the Court of Appeal, the TLP should aim to meet an inclusive need figure of 23 pitches, considering evidence from the London-wide GTANA. • The TLP should include a policy enabling the provision of sites for Travelling Showpeople, with potential locations referenced for interested community members. • London Gypsies and Travellers supports options 1 and 3 as appropriate and sustainable. They encourage partnership with Haringey Council for potential joint delivery and management of a 	<ul style="list-style-type: none"> • The Council will ensure close consultation with Gypsy and Traveller residents and community groups. • The London-wide GTANA will be considered on an on-going bases. • Policies for Travelling Showpeople and partnerships with neighboring authorities will be explored. • Design requirements and affordable accommodation needs will be addressed, further in the Local Plan development.

Rep no	Respondent	Summary of the comments	Council response
		<p>larger site, specifically recommending the Great Cambridge Road site owned by Haringey Council.</p> <ul style="list-style-type: none"> • Any smaller sites, particularly those owned by the local authority, should be included in site allocation appraisals. Residential use sites in the Enfield Local Plan should also be considered. • Different sizes and pitch numbers should be explored to find the best fit for available sites. • The policy should ensure access to affordable, culturally suitable accommodation for Gypsy and Traveller residents, many of whom are in precarious Temporary Accommodation and cannot afford private sites. Management options for social rented accommodation are strongly supported, but private sites should also be considered if there is interest. • Key design requirements for good quality accommodation should include accessibility for multigenerational families, sustainable and affordable energy, decent homes and space standards, and sustainable digital infrastructure to combat digital exclusion. • The Enfield GTANA recommends a transit/stop over site with 6 pitches for nomadic families, alongside other options like negotiated stopping. Transit sites should be well managed with fair fees and clear access criteria. • Continued use of the negotiated stopping approach is encouraged, with suitable locations identified and resources ensured for sanitation and other facilities 	
008	Metropolitan Police	<p>Metropolitan Police Service raised the following key matters:</p> <ul style="list-style-type: none"> • Metropolitan Police Service noted that an CSIA will be conducted, as per the Crime and Disorder Act 1998 and the Police and Justice Act 2006, reviewing crime, disorder and community safety levels when developing a strategy or plan. 	<ul style="list-style-type: none"> • The Council notes the requirement to conduct a CSIA as required and keep the Designing Out Crime Unit NE informed. • The impact of unauthorised

Rep no	Respondent	Summary of the comments	Council response
		<ul style="list-style-type: none"> • Assistance in completing a CSIA can be provided by the Designing Out Crime Unit NE. • Notifiable offences in Enfield have seen a negligible decrease, with burglaries decreasing and thefts increasing. • The Traveller Local Plan is unlikely to directly affect crime levels unless related to unauthorized encampments, making future trends difficult to predict. • Without the Traveller Local Plan, there could be an increase in unauthorized developments and encampments due to a lack of allocated sites, potentially leading to tensions between Traveller and settled communities. • Increased illegal occupation at Meridian Water sites and Mollison Avenue by organized criminal gangs with Traveller links has heightened tensions with the workforce on infrastructure projects. • LB Enfield has incurred costs of over £250K to clear over 200 tons of illegally dumped waste and may need to increase security at these sites. • The importance of the Traveller Local Plan is emphasized by these recent issues. • Support for IIA objective 7 to reduce crime and increase community safety, urging continued communication with the Crime & Community Safety Team. • Support for the aims in Chapter Six Integrated Impact Assessment findings and offering services to influence positive interventions in crime prevention, reduction in fear of crime, and increased community safety 	<p>encampments and illegal occupations will be monitored.</p> <ul style="list-style-type: none"> • Support for IIA objective 7 will be considered in crime prevention and community safety measures.
009	Environment Agency	Environment Agency raised no issues with the content of the consultation documents but provided the following advice:	<ul style="list-style-type: none"> • The Council will emphasize flood risk in the plan and ensure that Traveller sites are ideally located in flood zone 1. • Flood risk will be considered as part of

Rep no	Respondent	Summary of the comments	Council response
		<ul style="list-style-type: none"> • Emphasis needed on flood risk in the plan as permanent residential caravans are highly vulnerable in flood risk classifications. • Traveller sites should ideally be located in flood zone 1, avoiding all areas of flood risk. • If sites are proposed in flood zone 2, the exception test and a level 2 Strategic Flood Risk Assessment (SFRA) will be required to assess the risk. • Site Selection Methodology (SSM) Table 6 should explicitly include flood risk as a factor in site allocation assessment. • For Integrated Impact Assessment (IIA) Baseline information, it would be useful to reference the Water Framework Directive 2000 and its aims for improving watercourse ecological status. • Highlight the importance of placing sites and developments at least 8m from the riparian buffer zone of watercourses to protect biodiversity and habitats. • For IIA objective 13, suggest adding: Avoid impacts on watercourses by maintaining the 8m riparian buffer zone while enhancing aquatic and riparian habitats supporting biodiversity. 	<p>the site assessments.</p> <ul style="list-style-type: none"> • References to the Water Framework Directive and the importance of the riparian buffer zone will be incorporated into the IIA.

Duty to Cooperate Representations

3.4 The Council wrote to adjoining and nearby local planning authorities to ask if they could assist the Council in addressing the identified needs for Traveller accommodation. The table below set out the issues raised and a council response.

Rep no	Respondent	Summary of the comments	Council response
010	Essex County Council	<p>Essex County Council response to whether they could assist the Council in addressing the identified needs for Traveller accommodation?</p> <ul style="list-style-type: none"> Essex County Council (ECC) clarified that they are not responsible for housing and planning provisions for Gypsies, Travellers, and Travelling Showpeople, as these responsibilities lie with the Essex District, Borough, and City Councils, as well as the unitary authorities of Southend City Council and Thurrock Council. Therefore, ECC cannot assist Enfield in meeting any unmet Gypsy and Traveller requirements. They recommended that Enfield engage directly with these councils, particularly noting Epping Forest District Council as a neighboring authority. ECC operates the "Essex Countywide Traveller Unit," which supports Gypsies and Travellers in accessing services such as education, health, and fire safety but does not have a role in planning or delivering new sites. The responsibility to plan and meet the identified needs falls under the respective Local Planning Authorities in Essex. 	Noted, that ECC cannot assist as it is not responsible for these provisions. They advised contacting relevant district and unitary councils.
011	London Borough of Redbridge	<ul style="list-style-type: none"> Redbridge indicated that they cannot assist in addressing the identified needs for Traveller accommodation from neighboring boroughs. They currently have a single council-owned Traveller site with 16 pitches, which has limited potential for expansion and is reserved for their own identified needs. The recent London GTANA has reported higher pitch needs for Redbridge than previously estimated, suggesting a potential deficit of Traveller accommodation in their borough going forward to 	Noted, that LB of Redbridge cannot assist due to limited capacity and their own needs.

Rep no	Respondent	Summary of the comments	Council response
		<p>2031.</p> <ul style="list-style-type: none"> Consequently, Redbridge may need to use a site selection methodology to identify new sites, but this will take time. Therefore, Redbridge cannot accommodate unmet needs from other boroughs. 	
012	London Borough of Newham	<ul style="list-style-type: none"> Newham stated that they are unable to assist in addressing the identified needs for Traveller accommodation from neighboring boroughs. Their Regulation 18 Local Plan consultation and subsequent housing targets reveal an inability to meet the housing goals outlined in the 2021 London Plan due to recent delays in strategic site development. The commissioned Gypsy and Traveller Accommodation Needs Assessment (2022) identified a need for 23 pitches for households not meeting the PPTS planning definition between 2022 and 2038. Newham plans to meet their own pitch needs through a small sites programme within Council-owned land, while also considering the implications of the GLA's London-wide assessment. Given their current challenges in meeting housing targets and optimizing site capacity, Newham cannot accommodate Enfield's additional need for Traveller pitches but is open to further discussion in a duty to cooperate meeting. 	Noted, that LB of Newham cannot assist due to their own housing challenges and needs.

Call for site submissions

- 3.5 In response to the call for sites, Enfield Property Services formally submitted two sites for consideration: Bulls Cross Nursery and Durant's Park. Additionally, seven more sites were proposed after the issues and options consultation concluded, making a total of nine sites under Council ownership. Separately, the London Borough of Haringey submitted a site for consideration but was later withdrawn.

4. Next steps

- 4.1 In the Autumn of 2024, we intend to publish our preferred options and proposed sites (as an additional Regulation 18 consultation TLP).
- 4.2 The responses to consultation received will inform the future stages of Local Plan development. These steps are set out in detail in the Council's adopted Local Development Scheme (available from [Local Development Scheme | Enfield Council](#)).

Appendix 1: Consultation letters/emails

Consultation Letter text to all those on the Local Plan database (with postal address):



ENFIELD
Council

Please reply to:

Email: Travellerlocalplan@enfield.gov.uk
Phone: 020 8379 3866

Date: 29th September 2023

Enfield Council's Traveller Local Plan – Issues and Options Consultation

Dear consultee,

I am writing to advise you that Enfield Council has now published a Traveller Local Plan (TLP) and supporting documentation for public consultation.

The TLP and supporting documentation is the subject of a 6-week period of formal public consultation from Friday 29th September 2023. Representations should be received no later than **5pm on Friday 10th November 2023**.

Traveller Local Plan (TLP)

Enfield Council is preparing a TLP which will set out how the accommodation needs of Gypsies and Travellers within the borough, will be met. This will be subject to an ongoing programme of engagement and consultation. When it is adopted, the TLP will form part of the development plan for the area and be used in determining planning applications.

The issues and options document forms the first stage in plan-preparation. A vital part of this process is seeking the views of residents from the travelling communities, the settled population and other interested parties on the options and questions explored in the consultation document, and also on the supporting documents.

The TLP and the supporting documentation can be viewed on our website at: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

As well as the TLP, the following supporting documents can be viewed:

- Integrated Impact Assessment (July 2023)
- Updated Traveller Site Selection Methodology (September 2023)
- Gypsy and Traveller Accommodation Needs Assessment (October 2020)

Simon Pollock
Interim Executive Director of Environment and Communities
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY
www.enfield.gov.uk

 If you need this document in another language or format contact the service using the details above.

- Equalities Impact Assessment (June 2020)
- Frequently Asked Questions (FAQs) (September 2023)

You can respond in several different ways:

- By downloading the response form from [here](#) , completing it and returning it by email to travellerlocalplan@enfield.gov.uk
- By sending comments to us by email (using the above email address) or
- By sending comments to us by post to Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA - **If you are able to respond electronically, rather than by post, that would be preferred. Thank you.**

Representations cannot be made anonymously. Please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Hard copies of the Traveller Local Plan are available to view in the Civic Centre, as well as the borough's libraries. Library locations and opening hours can be found here: <https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/>

A consultation event will be held in due course. More information on this will be provided on our website in the coming days.

As part of this consultation, we are running a '**call for sites**' exercise. A 'call for sites' is an opportunity for developers, landowners and other interested parties to put forward sites for development within the Borough that are considered suitable and available for development. We are seeking suggestions from landowners and other interested parties for sites to assist with the preparation of this TLP. If you would like to submit a site for consideration as part of this plan-making process, please complete our call for sites form which can be found in [here](#) ideally attaching a 1:1250 scale Ordnance Survey map which shows the precise boundaries of the site (although this could be hand drawn) and details of site ownership. The deadline for the submission of sites is **5pm on Friday 10th November 2023.**

Yours faithfully,



May Hope
Plan Making Manager
Plan Making Team | Strategic Planning & Design | Planning Service

We are contacting you because you have previously indicated that you would like to receive updates on the local plan. For information on data handling please see <https://new.enfield.gov.uk/privacynotice/>

Consultation Email text to all those on the Local Plan database (with email address):

Subject text: Enfield Council's Traveller Local Plan – Issues and Options Consultation

Body text:

Dear consultee,

I am writing to advise you that Enfield Council has now published a Traveller Local Plan (TLP) and supporting documentation for public consultation.

The TLP and supporting documentation is the subject of a 6 week period of formal public consultation from Friday 29th September 2023. Representations should be received no later than **5pm on Friday 10th November 2023**.

Traveller Local Plan (TLP)

Enfield Council is preparing a TLP which will set out how the accommodation needs of Gypsies and Travellers within the borough, will be met. This will be subject to an ongoing programme of engagement and consultation. When it is adopted, the TLP will form part of the development plan for the area and be used in determining planning applications.

The issues and options document forms the first stage in plan-preparation. A vital part of this process is seeking the views of residents from the travelling communities, the settled population and other interested parties on the options and questions explored in the consultation document, and also on the supporting documents.

The TLP and the supporting documentation can be viewed on our website at: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

As well as the TLP, the following supporting documents can be viewed:

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- Updated Traveller Site Selection Methodology (September 2023)
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- Equalities Impact Assessment (June 2020)
- Frequently Asked Questions (FAQs) (September 2023)

You can respond in several different ways:

- **By downloading the response form from here (add document)**, completing it and returning it by email to travellerlocalplan@enfield.gov.uk
- By sending comments to us by email (using the above email address) or
- By sending comments to us by post to Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA - **If you are able to respond electronically, rather than by post, that would be preferred. Thank you.**

Representations cannot be made anonymously. Please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Hard copies of the Traveller Local Plan are available to view in the Civic Centre, as well as the borough's libraries. Library locations and opening hours can be found here: <https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/>

A consultation event will be held in due course. More information on this will be provided on our website in the coming days.

As part of this consultation, we are running a '**call for sites**' exercise. A 'call for sites' is an opportunity for developers, landowners and other interested parties to put forward sites for development within the Borough that are considered suitable and available for development. We are seeking suggestions from

landowners and other interested parties for sites to assist with the preparation of this TLP. If you would like to submit a site for consideration as part of this plan-making process, please complete our call for sites form which can [be found in here \(add document\)](#) ideally attaching a 1:1250 scale Ordnance Survey map which shows the precise boundaries of the site (although this could be hand drawn) and details of site ownership. The deadline for the submission of sites is **5pm on Friday 10th November 2023**.

Yours faithfully,

May Hope
Plan Making Manager
Plan Making Team | Strategic Planning & Design | Planning Service

We are contacting you because you have previously indicated that you would like to receive updates on the local plan. For information on data handling please see <https://new.enfield.gov.uk/privacy-notice/>

Consultation Letter under the Duty to Co-operate:

Sent via email.

Please reply to: May Hope

Email: travellerlocalplan@enfield.gov.uk

Phone: 020 8379 3866

Textphone:

Fax:

My Ref: Duty to Cooperate – unmet needs

Your Ref:

Date: 24th October 2023

Dear Sir / Madam,

Enfield's Traveller Local Plan

As you may be aware, Enfield is in the process of preparing a new Local Plan and a separate Traveller Local Plan (TLP).

Enfield, like many other authorities, is heavily constrained which makes meeting housing needs challenging. In particular, environmental and planning constraints and lack of suitable and deliverable sites are a particular constraint on meeting the identified needs for Gypsy and Traveller pitches.

To directly address this need, as referenced above, Enfield is currently progressing work on a new Traveller Local Plan (TLP). We are currently consulting on the Issues and Options for the TLP, which you are invited to comment on. More information can be found here:

<https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan> As part of this consultation, we are also undertaking a 'call for sites' exercise.

We have been actively engaging with all of our neighbours and stakeholders under the Duty to Co-operate for several years, and now wish to extend this process as we consider how Enfield will meet its own identified Gypsy and Traveller needs.

A Gypsy and Traveller Accommodation Needs Assessment (GTANA) was published in 2020. The assessment found that the overall need is for 23 pitches, of which 21 pitches are from households who meet the Traveller definitions set out in PPTS. The assessment did not evidence any need for additional Travelling Show person plots in the Borough. Provision of a transit site/stop over site with capacity for 6 pitches was also recommended (to accommodate up to 12 caravans at one time). The assessment stated that the Council could also consider a negotiated stopping policy to manage unauthorised encampment activity across the Borough.

In addition, the Council has prepared a draft Traveller Site Selection Methodology which we are also seeking comments on as part of the Issues and Options TLP consultation. This methodology sets out how any potential sites for Traveller development might be assessed. The suggested methodology has been adapted from the methodology used to assess housing and economic sites through the Housing and Employment Land Availability Assessment (HELAA) that supports the emerging Enfield Local Plan. Once the methodology has been finalised, the Council will use it to prepare a Traveller Land Availability Assessment (TLAA). The TLAA will utilise any sites submitted to the 'TLP Call for Sites' exercise, as well sites in the Housing and Economic Land Availability Assessment (HELAA), and will assess these sites against the finalised Traveller Site Selection Methodology.

As you will be aware, Enfield is a constrained borough with around 40% of its area covered by Green Belt and a further 300 hectares (5%) designated as Strategic Industrial Location (SIL). Other

significant constraints such as SSSI, MOL, Registered Parks and Gardens and Ancient Woodland affect large areas of the borough.

The purpose of this letter therefore is to seek confirmation of your Council's current Local Plan position regarding meeting your identified needs for Gypsies, Travellers and Travelling Showpeople, and to formally ask if your council would be in a position to assist Enfield in meeting any of its potentially unmet Gypsy and Traveller requirements.

We are expecting to publish the next stage of the TLP in Spring 2024 and thus there is some degree of urgency for us in understanding whether or not your council would be in a position to take any of Enfield's potentially unmet Gypsy and Traveller needs. **Accordingly, I would be grateful for a response to this letter by 10th November 2023.**

In the meantime, if you feel you need more information, including detailed evidence or would like to discuss the matter with us before formally responding please let me know as soon as possible so that we can arrange a meeting in early November.

For your information, a similar request has also been sent to all neighbouring authorities and other authorities within our Housing Market Area.

Yours sincerely

May Hope
Plan Making Manager
Plan Making Team | Strategic Planning & Design | Planning Service

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to **www.enfield.gov.uk/connecte**

Acknowledgement text for automated email replies:

Dear respondent,

Thank you for your response on the draft Traveller Local Plan consultation. We can confirm that your response has been received.

Your comments will be considered as part of the next stages of Traveller Local Plan development, and comments will be published on the Council's website in due course. To view our Privacy Notice, please visit [here](#).


If you would like your contact details to be added to the Local Plan database please respond to this email to let us know. This will ensure that you are kept up to date as the Traveller Local Plan progresses.

Regards,

Plan Making Team

Appendix 2: Webpage

The Council's dedicated webpage announced the latest updates regarding the Issues and Options consultation over the six-week period from Friday, 29 September 2023, to its closure at 5 pm on Friday, 10 November 2023.

Newsletter Login/Register Accessibility tools

Search this site for information, advice and more...

All services

Home > Services > Planning and building > Emerging plans

Emerging plans

- New Local Plan
- Call for sites
- Neighbourhood planning
- Traveller Local Plan**

Traveller Local Plan

Latest news

The consultation on the Regulation 18 Issues and Options consultation has now closed.

Thank you to everyone who took the time to comment. The council are working through the responses received.

More information on the next stage of the Traveller Local Plan will be available in due course.

Preparation of the Traveller Local Plan

We are preparing a Traveller Local Plan which will set out how the accommodation needs of Gypsies and Travellers within the borough, will be met.

This will be subject to an ongoing programme of engagement and consultation. When adopted, the Traveller Local Plan will form part of the development plan for the area and be used in determining planning applications.

The [Issues and Options document \(PDF, 1553.37 KB\)](#) forms the first stage in plan-preparation. A vital part of this process is seeking the views of residents from the travelling communities, the settled population and other interested parties on the options and questions explored in the consultation document, and also on the supporting documents.

The Issues and Options consultation ran for a period of 6 weeks from **Friday 29 September 2023 and closed at 5pm on Friday 10 November 2023.**

Documents can be viewed below:

- [Traveller Local Plan - Issues and Options Consultation Document \(September 2023\) \(PDF, 1553.37 KB\)](#)
- [Integrated Impact Assessment \(July 2023\) \(PDF, 4174.91 KB\)](#)
- [Updated Traveller Site Selection Methodology \(September 2023\) \(PDF, 1904.9 KB\)](#)
- [Gypsy and Traveller Accommodation Needs Assessment \(October 2020\) \(PDF, 1448.85 KB\)](#)
- [Equalities Impact Assessment \(June 2020\) \(PDF, 282.78 KB\)](#)
- [Call for Sites submission form \(PDF, 392.76 KB\)](#)
- [Consultation Response Form \(PDF, 711.59 KB\)](#)
- [Frequently Asked Questions \(September 2023\) \(PDF, 682.09 KB\)](#)

Council news directly to you

The latest news in your inbox every week. Council news, community updates, local events and more.

Sign up

Appendix 3: Consultation posters & flyers and newspapers

Posters and flyers were produced, printed, and distributed to Enfield Libraries and Community Hubs. Also print adverts were published in Enfield Independent, Parikiaki and Avrupa.

Posters and flyers

HAVE YOUR SAY

TRAVELLER Local Plan

We're seeking views from the travelling communities, as well as the wider community, about the issues and options to feed into the **Traveller Local Plan**.

Come along to our consultation event to find out more:

Wednesday 1 November 2023
1-6pm
Civic Centre, Silver Street
Enfield EN1 3XA

We are also asking for site suggestions from landowners and other interested parties to assist with the preparation of this plan.

Closing date for submissions and comments is Friday 10 November 2023, 5pm.

For full details, please visit www.enfield.gov.uk/travellerlocalplan

ENFIELD Council

Enfield Independent

4 OPINION

October 25, 2023

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Newspaper Sales & Subscriptions
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 Tel: 0800 363 0227

General Enquiries
 Tel: 01288 516216

Call for medical aids
 ANNE Mackiewicz is a glamorous 60-year-old lady who has had to be established in Ukraine for the last 18 months. She has lost her job, her home and her family. She has had to be established in Ukraine for the last 18 months. She has lost her job, her home and her family. She has had to be established in Ukraine for the last 18 months. She has lost her job, her home and her family.

Mobility aids desperately needed for amputees injured in Ukraine
 Small amount of money could help with mobility aids for amputees injured in Ukraine. Mobility aids desperately needed for amputees injured in Ukraine. Small amount of money could help with mobility aids for amputees injured in Ukraine.

Blood donors needed
 O NEGATIVE and B negative blood stocks are currently low. We are encouraging our amazing donors in London to please come for a blood donation. Blood donors needed. O NEGATIVE and B negative blood stocks are currently low. We are encouraging our amazing donors in London to please come for a blood donation.

Fertility week
 We are very much looking forward to Fertility Week (Monday, October 30) this year. Fertility week. We are very much looking forward to Fertility Week (Monday, October 30) this year.

Stroke support
 DASH research highlights people who stroke a stroke only affects older people. Stroke support. DASH research highlights people who stroke a stroke only affects older people.

Have your say
 We're seeking views from the travelling communities, as well as the wider community, about the issues and options to feed into the Traveller Local Plan. Have your say. We're seeking views from the travelling communities, as well as the wider community, about the issues and options to feed into the Traveller Local Plan.

Traveller Local Plan

Wednesday 1 November 2023
1-6pm
Civic Centre, Silver Street
Enfield EN1 3XA

We are also asking for site suggestions from landowners and other interested parties to assist with the preparation of this plan.

Closing date for submissions and comments is Friday 10 November 2023, 5pm.

For full details, please visit www.enfield.gov.uk/travellerlocalplan

ENFIELD Council

Parikiaki

ΠΑΡΟΙΚΙΑ

Επίσκεψη του Επισκόπου Μεταίτης στην Ι. Μητρόπολη Κιτίου

Το ελληνικό παροικιακό σχολείο του Αιθιώτη γιορτάζει το «ΟΧΙ»

Εορτασμός 28ης Οκτωβρίου 1940 στο Ανεξάρτητο Ελληνικό σχολείο St Mary's

HAVE YOUR SAY

TRAVELLER Local Plan

Wednesday 1 November 2023
1-6pm
Civic Centre, Silver Street
Enfield EN1 3XA

We are also asking for site suggestions from landowners and other interested parties to assist with the preparation of this plan.

Closing date for submissions and comments is Friday 10 November 2023, 5pm.

For full details, please visit www.enfield.gov.uk/travellerlocalplan

ENFIELD Council

Avrupa

Özgür Filistin anonsu yapan malikist isten attı

DAHA İLERİ FİLİSTİNİN KATLEDİLMESİ GEREKİYOR





Türk Eczanesi Sigarayı Burada Bırakın ÜCRETSİZ


Sigarayı Bırakmak mı istiyorsunuz?

ENFIELD Council


Appendix 4: Digital newsletters

Latest Enfield News [View this email online](#)




Your October 2023 Improving Enfield Newsletter





First Council residents move in to new homes at Meridian Water

The first residents at Meridian Water were delighted to attend the opening of the recently completed council homes. Homes were allocated to local residents which included some family-sized and accessible properties for disabled tenants. The 20 council homes completed in September are the first of 300 being delivered at Meridian One and kick-start the 10,000 homes being delivered at Meridian Water overall. You can read the full story on [Enfield Council's website](#) and find out more about the project at [Meridian Water's website](#).



Engagement begins on Traveller Local Plan

Enfield Council has launched a Traveller Local Plan, which sets out how to accommodate the needs of Gypsies and Travellers within the borough. This will be subject to an ongoing programme of engagement and consultation exercises. In addition, we are running a 'call for sites', which is an opportunity for developers, landowners and others to put forward sites for development. Suggestions will help in the preparation of the Traveller Local Plan. All details can be found in the [planning and building section of our website](#).



Appendix 5: Social media

Communication messages were published across three Enfield Council social media platforms. Below illustrates how far the messages reached and the level of engagement.

Table 2: Social media engagement

Interactions	Twitter	Facebook	LinkedIn	TOTAL
Impressions	2,353	2,233	2,327	6,913
Link clicks	13	0	41	54
Engagement	29	69	62	160
TOTAL	2,395	2,302	2,430	

*LinkedIn's analytics does not track the number of link clicks, just post clicks which have been included in the number of engagement figures as with the other social platforms.

Appendix 6: Issues and Options consultation feedback and decisions made

Table 3: Consultation feedback and decisions made:

Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
Consultation	Question 1: Do you know of any specific individuals or groups that the Council should directly consult with as part of this TLP process?	<p>None put forward.</p> <p>Consultation database to remain as it is.</p> <p>Continue to liaise with Enfield G&T Liaison Officer to engage directly with the Travelling community.</p>
Evidence to support the TLP	Question 2: Have we correctly identified the evidence needed to support the TLP, or is additional evidence required?	The updated definition should be considered when assessing need. GTANA was updated to ensure TLP is based on robust evidence. Reference should be made to the London wide GTANA. Note reference in para 3.7 – 3.9 of this Draft Plan.
	<p>Question 3: Do you have any specific comments on the following evidence base documents:</p> <ul style="list-style-type: none"> • GTANA • Draft Traveller Site Selection Methodology • IIA • EqIA 	<p>It was recommended that the London-wide GTANA should be used (or noted). See above.</p> <p>Two respondents provided comments on the IIA. These were passed onto the IIA technical consultants for consideration (and to be inputted into the next draft of the IIA).</p> <p>A request was made for the Site Selection methodology to include flood risk. This has been included.</p> <p>No comments received on the EqIA.</p>
TLP Aims and Objectives	Question 4: Are the proposed aims appropriate for the TLP, or are there additional / alternative aims which need to be considered?	The plan should aim to meet the cultural need as well as the PTS need. This is now the case (see updated GTANA and increased overall need).
	Question 5: Are the proposed objectives appropriate for the TLP, or are there additional / alternative objectives which	Objectives were considered to be appropriate but should include measures for addressing unauthorised encampments and ensuring affordable,

Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
	<p>need to be considered? Please provide information if so.</p>	<p>culturally suitable accommodation. Objectives have not been amended however these points will directly derive from the delivery of the TLP. See the Policy on Design (TLP2) and the monitoring section.</p>
<p>TLP Plan Period</p>	<p>Question 6: Which end date should the council proceed with, or is there an alternative plan period which should be considered? If so, please explain.</p> <ul style="list-style-type: none"> • Option 1: Plan end date of 2036 • Option 2: Plan end date of 2039 • Option 3: Plan end date of 2041 	<p>Option 3 was preferred: Plan end date would be (existing) NPPF compliant and align with both the adopted London Local Plan and the emerging Enfield Local Plan.</p>
<p>Cultural and PPTS need (for permanent provision)</p>	<p>Question 7: Should the TLP seek to only provide for the accommodation needs of those who still travel (21 pitches) or should it also seek to include the needs of those who culturally identify themselves as Travellers but who are not travelling (a further 2 pitches) giving a total requirement of 23 pitches.</p>	<p>Due to the change in the NPPF (and PPTS) definition in 2023, further to the Lisa Smith Case, the Council should now plan to meet for cultural need. Note that the GTANA has been updated accordingly, which has increased the overall permanent pitch need to 30 pitches for the Plan period.</p>
<p>Travelling Showpeople need</p>	<p>Question 8: Should the TLP provide a criteria-based policy for Travelling Showpeople plots?</p>	<p>Although there is no identified need within the Borough at present, the Plan should provide a framework for decision making for this type of application, should they come forward. See Policy TLP1.</p>
<p>Policy options to deliver the identified permanent need</p>	<p>Question 9: Which of the identified policy options above are most appropriate for the TLP? Please explain your answer.</p> <ul style="list-style-type: none"> • Option 1: Allocate small new sites • Option 2: Allocate one large site 	<p>Options 1 and 3 were preferred.</p> <p>3 responses were received as part of the Duty to Co-operate correspondence. All confirmed that they would not be able to meet any of Enfield's identified need.</p>

Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
	<ul style="list-style-type: none"> • Option 3: Provide pitches as part of a large housing development • Option 4: Liaise with Neighbouring Local Authorities to address the identified need • Option 5: Do nothing 	
	<p>Question 10: Are there any other potential policy options that have not been considered above? If so, please provide details.</p>	<p>No comments received.</p>
<p>Location of new traveller sites</p>	<p>Question 11: Are there specific urban or rural locations or sites specifically within the east or the west of the Borough which the TLP should consider? Please provide further information if so.</p>	<p>No comments received. Draft Plan will seek further views when proposing site allocations.</p>
	<p>Question 12: If allocating more than one site, how should these be distributed across the Borough? Please explain your answer</p>	<p>No comments received. Draft Plan will seek further views when proposing site allocations.</p>
<p>Site Type, Size, Tenure and Management</p>	<p>Question 13: If allocating more than one site to meet the identified permanent need, what would be an appropriate site size (in hectares) to allocate? Please explain your answer.</p> <p>Question 14: If allocating more than one site to meet the identified permanent need, how many pitches should be allocated per site? Please explain your answer.</p>	<p>No comments received. Draft Plan will seek further views when proposing site allocations.</p> <p>6 – 8 pitches were ideal where appropriate.</p>
	<p>Question 15: Should the TLP consider including a rural exception sites policy? If so, please explain your answer.</p>	<p>No comments received. Rural exceptions policy not considered necessary to progress.</p>

	<p>Question 16: Which of the management options below is preferred? Please explain your answer.</p> <p>Option 1: Allocated land is sold to Travellers who then have the responsibility of equipping the site in the same way that this happens on privately owned sites at present.</p> <p>Option 2: Allocated sites form part of the affordable housing provided on a private housing development. In such cases the developer would in all probability put in access, land drainage, sewerage, water and electricity as a minimum. Pitches could be sold or rented but would have to remain affordable. This is usually achieved by the involvement of a Registered Social Landlord but there may be other ways of achieving this.</p> <p>Option 3: The Council or Registered Social Landlord buys allocated land, provides the facilities as per option 2 above and then sells or rents the site to the occupants. The Council or Registered Social Landlord retains a role in site management if the site is rented to the occupants.</p> <p>Option 4: The land is privately owned and rented to the occupants with or without facilities. The site owner is most likely to manage the maintenance of the site if it remains in his/her ownership.</p> <p>Option 5: A variety of means of tenure could be spread across the allocated sites.</p>	<p>The preferred management option was for the Council to manage the site(s). Further information on this will be provided as the TLP progresses towards delivery.</p>
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Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
Design of New Traveller Sites	Question 17: Should the TLP contain a policy relating to design requirements for new Traveller sites? If so, what matters should be included?	Yes. The policy should focus on accessibility and sustainability. See draft Policy TLP2 as written.
Transit site/stop over site and negotiated stopping place	Question 18: Should the TLP provide for a transit site / stop over site, and if so, what size is considered suitable?	The need for transit sites should be assessed based on current and projected demand. Note that the need for a transit site was reflected within the GTANA update. See proposed allocation (Land at A10) to meet this need.
	Question 19: Are there specific locations or areas within the Borough that the TLP should consider for the Transit site / stop over site? Please explain your answer.	No comments received. Draft Plan will seek further views when proposing site allocations.
	Question 20: Should the TLP explore negotiated stopping places in consultation with neighbouring authorities?	Yes. Section 5 of this Draft Plan refers to negotiated stopping places.
	Question 21: Are there any other issues and options or matters concerning provision for travellers that should be dealt with by way of additional planning policies?	No comments received. Draft Plan will seek further views when proposing site allocations.
Monitoring	Question 22: Do you have any comments on monitoring of the TLP, or any suggested monitoring indicators?	No comments received. Draft Plan will seek further views when proposing site allocations.