

Traveller Local Plan (TLP)

Meeting the needs of Gypsies, Travellers and Travelling Showpeople

Draft Plan

(Regulation 18)

September 2024

www.enfield.gov.uk



Consultation Details

Consultation on initial issues and options for the Traveller Local Plan (TLP) was undertaken in 2023. The Council has considered the consultation responses received, and prepared this Draft TLP, which proposes site allocations and draft policies to meet the identified needs of the Traveller communities in the Borough.

The following supporting documentation is also available to view and comment on:

- TLP Regulation 18 Consultation Statement 2024
- Updated Gypsy and Traveller Accommodation Assessment (GTAA) 2024
- Integrated Impact Assessment (IIA) 2024
- Equality Impact Assessment (EqIA) 2024
- Site Selection Paper (2024) – Incorporating the Final Site Selection Methodology.

All communities are now invited to submit comments on the content of this Draft Plan, and its supporting documents. More information, including the planned consultation events across the Borough, and where hard copies can be viewed, can be found on the Council's website at:

<https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

If you would like to submit a site for consideration as part of this plan-making process, please complete our [call for sites form \(PDF, 392.76 KB\)](#), 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. This can be sent to us using the email or postal address below.

How can I respond to this consultation?

Comments are now welcome on the Draft Plan and supporting documentation. Please note that any responses considered to be inappropriate will not be included as part of this consultation. Please respond by:

- Completing the online response form on our consultation portal at letstalk.enfield.gov.uk/traveller-local-plan

Alternatively, comments can be emailed to us at:

- travellerlocalplan@enfield.gov.uk

If you do not have access to the above link or email, written comments will be accepted by post at the following address:

- Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA

If you have any queries regarding this Draft Plan, or would like assistance in completing a response form, please contact a member of the Plan Making Team on travellerlocalplan@enfield.gov.uk or call 020 8379 3866. This consultation will run for a 6-week period from 23 September 2024 **until 5pm on Monday 4 November 2024.**

Further information on how your personal data will be used is given in the privacy notice. Non personal data may be published on this website in due course. More information can be found here: <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#privacy-notice-for-the-enfield-local-plan>

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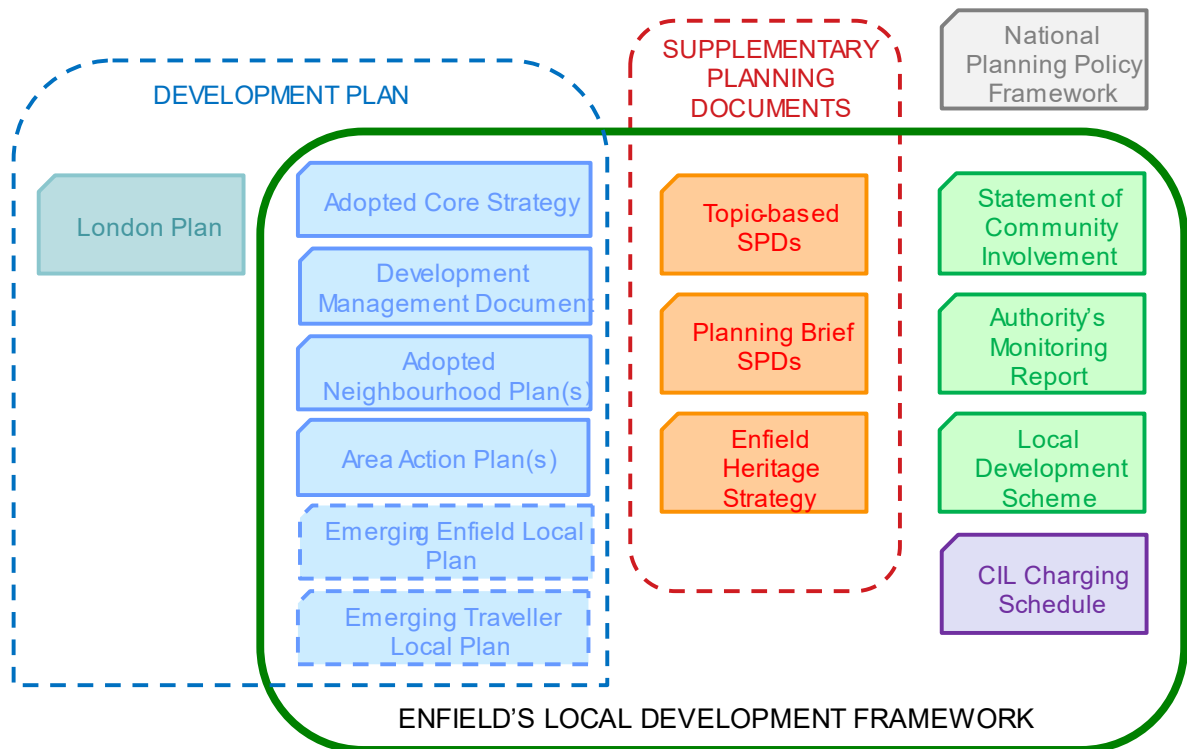
1. Introduction

- 1.1. The London Borough of Enfield (LBE), like all Local Planning Authorities, is required by Central Government to assess the accommodation needs of Gypsies and Travellers and develop a strategy to address these needs. The Traveller Local Plan (TLP) outlines how this need will be met over the next 15 years up until 2041.
- 1.2. This Draft Plan represents the next step in the plan-making process. It includes proposed site allocations and draft policies designed to meet the identified needs of the Traveller communities in the Borough. All communities are invited to submit comments on the content of this Draft Plan and the supporting documentation.

Background

- 1.3. The term 'Travellers' encompasses a diverse range of people and groups with different histories, cultures and beliefs, including English Romany Gypsies, Irish and Scottish Travellers, European Roma, 'New Age' Travellers, and Travelling Showpeople. For the purposes of this Draft Plan, any reference to 'Travellers' includes Gypsies (including Roma), Travellers and Travelling Showpeople. For ease of reference, a glossary of terms has been made available in Appendix A of this Draft Plan.
- 1.4. LBE recognises that failing to allocate sufficient land to meet the identified needs of Travellers would negatively impacts all communities in the Borough. It would make it harder to resist future speculative planning applications for temporary planning permission, and more challenging to take effective enforcement action against unauthorised encampments. Additionally, it could result in more sites being permitted through the planning appeal process.
- 1.5. Once adopted, the TLP will set out how LBE will meet the future accommodation needs of the Travelling communities. The TLP will form part of the Development Plan for Enfield (see Figure 1 below), alongside the London Plan (2021), the North London Waste Plan (2022), the Hadley Wood Neighbourhood Plan (2023), and the new Enfield Local Plan (currently at examination). The TLP will apply to the whole of the Borough of Enfield.

Figure 1: Enfield Development Framework¹



¹ Figure 1 references the adopted Core Strategy and Development Management Document. These will be superseded by the emerging Enfield Local Plan, once the emerging Enfield Local Plan has been adopted.

2. Previous Consultation (Issues and Options)

- 2.1. In Autumn 2023, LBE consulted on the issues and options for the TLP. The [Issues and options consultation document](#) outlined the purposes of the TLP, explained the plan-making process and presented a series of options for addressing the accommodation needs of the Traveller communities in the Borough.
- 2.2. Alongside the Issues and Options consultation document, the Council:
 - i) Published an [Integrated Impact Assessment](#) (IIA), which considered and reported on the likely significant sustainability issues and effects associated with the emerging TLP.
 - ii) Issued a further call for sites.
 - iii) Contacted adjoining planning authorities under the Duty to Cooperate, asking whether they could assist LBE in meeting the identified needs for Traveller accommodation.
- 2.3. Eleven consultation responses were received, including one response under the 'Duty to Cooperate'. The feedback received has been summarised in the TLP Consultation Statement, which can be viewed alongside this Draft Plan.
- 2.4. In response to the call for sites, two sites were formally submitted for consideration: Bulls Cross Nursery and Durant's Park. An additional seven sites were submitted after the issues and options consultation had concluded. All nine sites are Council owned. Further information is provided on each site in Section 6 of this Draft Plan.
- 2.5. The Consultation Statement published alongside the Draft TLP explains how the issues and options consultation was undertaken, and summarises the responses received. It also provides an overview of some of the decisions made around the preferred options (see Appendix B).

3. Planning Policy and Evidence:

Planning Policy for Travellers

- 3.1. In December 2023, the Government announced that it was reverting to the definition of Gypsies and Travellers as set out within Annex 1 of the 2012 Planning Policy for Travellers (PPTS):

'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 dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling Showpeople [sic] or circus people travelling together as such.'
- 3.2. Similarly, the following definition from Annex 1 of the Guidance in respect of Travelling Showpeople is used:

'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 dependents' more localised pattern of trading,

educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.'

3.3. In addition:

'For the purposes of this planning policy, "pitch" means a pitch on a "gypsy and traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "gypsies and travellers" and mixed-use pitches for "travelling showpeople", which may/will need to incorporate space or to be split to allow for the storage of equipment.'

(DCLG Planning policy for traveller sites August 2015 Annex 1, para 5).

3.4. For the purposes of this Draft Plan, therefore, Gypsies and Travellers live on pitches within sites, whilst Travelling Showpeople live on plots within yards.

Enfield GTANA

3.5. By deciding the TLP period should extend to 2041, in alignment with the emerging Enfield Local Plan, it became necessary to extend the need forecasting within the existing Gypsy and Traveller Accommodation Needs Assessment (GTANA) by an additional two years. Importantly, extending the TLP period and associated evidence to 2041 means that the Plan will look forward at least 15-years from the date of adoption, as required by the National Planning Policy Framework (NPPF).

3.6. An update to the existing GTANA (2020) was commissioned, resulting in the GTANA (2024). This updated assessment includes 2021 Census data and removes reference to the 2015 Planning Policy for Traveller Sites 'nomadic habit of life' definition, in light of the Government's reversion to the 2012 definition following the Lisa Smith Court of Appeal judgement in 2023. The updated GTANA (2024) can be viewed alongside this Draft Plan.

London-wide GTANA

3.7. In addition to the Enfield GTANA (2024), the Greater London Authority (GLA) has commissioned a London-wide GTANA. This study is currently underway, with findings expected to be published in autumn 2024.

3.8. The main objective of the London-wide assessment is to provide a robust and reliable evidence base for policy development in relation to housing and planning. It assesses the accommodation needs for Gypsies, Travellers, Travelling Showpeople and Roma communities, across London, with a breakdown by borough. The assessment determines accommodation needs based on both the definition set out in the Department for Levelling Up, Housing and Communities' (DLUHC's) Planning Policy for Traveller Sites (PPTS) (2023), and the broader definition used in the draft London Plan (2018).

3.9. The London Borough of Enfield is working closely with the GLA on this assessment. The needs identified in the London-wide assessment are expected to align with those in Enfield's updated GTANA (2024).

Enfield Local Plan

- 3.10. The ELP sets out the amount and types of new development required in the Borough to meet the needs of local residents and businesses and allocates sites to accommodate this growth. It also includes a range of policies and guidance to manage the form and quality of new development. The ELP is anticipated to be adopted before the TLP, as the ELP has recently been submitted for independent examination.
- 3.11. Draft Policy H10 (Traveller Accommodation) within the emerging ELP (attached as Appendix C), sets out LBE's strategic commitment to meeting the identified Traveller accommodation needs through a separate TLP. Draft Policy H10 also sets out a series of assessment criteria against which proposals for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople will be assessed. The criterion cover:
- Location and connectivity;
 - Impact on the environment and heritage;
 - Occupational suitability;
 - Safe access;
 - Integration with surrounding area; and
 - On site utility provision.
- 3.12. The criteria in ELP draft Policy H10 that relate to the suitability of a site for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople (criterion a, b, c, d, and e) will only apply to sites that are not allocated in the TLP. This is because the principle of development on sites allocated in the TLP has already been established following detailed assessment of the sites, as part of the process of preparing the TLP.
- 3.13. Criterion f and g of Draft Policy H10 will apply to all proposals for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople, irrespective of whether the site is allocated in the TLP. This is because all proposals aimed at meeting Traveller accommodation needs should ensure the development is appropriately integrated with its setting, and that provision is made for on-site utilities.

4. Enfield’s updated Traveller needs:

Gypsy and Traveller pitch requirements

- 4.1. There is an overall need for 30² additional Gypsy and Traveller pitches across the Borough for the period 2020/21 to 2040/41 (see Table 1 below). Of this total, 16 pitches are required in the first five-year period (2020/21 to 2024/25) and the remaining 14 pitches are needed over the subsequent period up to 2040/41.
- 4.2. Consequently, Enfield’s current need for ‘permanent’ pitches can be summarised as follows:

Table 1: Gypsy and Traveller pitch need 2020/21 to 2040/41 (also known as permanent provision)³

Period	Pitch need
5yr Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	16
Longer-term need	
Over period 2025/26 to 2029/30 (B)	3
Over period 2030/31 to 2034/35(C)	4
Over period 2035/36 to 2040/41 (D)	7
Longer-term need TOTAL to 2040/41 (21 years) E=(B+C+D)	14
NET SHORTFALL 2020/21 to 2040/41 (A+E) (26 years)	30

Transit provision

- 4.3. Based on evidence from the 2024 GTANA and the ongoing need for transit provision, there is a need for land to accommodate permanent stopover location(s) for at least 15 caravans at one time. The GTANA (2024) suggests that this need could be met through the establishment of a transit site or designated stopover location(s) identified by the local authority. The Draft Plan should propose the allocation of at least one transit site within the Borough to address this identified need.

Travelling Showpeople plot requirements

- 4.4. Currently, there is no provision for Travelling Showperson in Enfield. The 2009 GLA GTANA identified a need for three plots for the period 2007-2017, but there have been no applications for plots since 2007. The Enfield GTANA (2024) has not evidenced any need for additional Travelling Showperson plots in the Borough. However, the GTANA (2024) recommends that the Council should respond to any emerging needs over the Plan period through its planning policy.

² The overall need identified within the Issues and Options consultation document referred to 21 pitches (to meet the PPTS need), or 23 pitches (to meet cultural need). As such, the GTANA update identifies an additional need for 7-9 pitches within Enfield.

³ Source: Table ES1 – London Borough of Enfield GTANA 2024 update – Final Report

Summary of Need

4.5. In summary, the Draft Plan seeks to allocate the following types of sites:

Table 2: Summary of overall site requirements in Enfield

Site type:	Site Quantity
Permanent shortfall (2020/21 to 2024/25) and short-term need (2029/30)	19 pitches
Permanent Longer-term need (2030/31 – 2040/41)	11 pitches
Transit need	To allocate at least one site to accommodate a minimum of 15 caravans.
Travelling Showpeople plots	None. No need identified.

4.6. In terms of the permanent need, it should be noted that the time periods used in Table 2 differ from those used in the GTANA (and Table 1 above). The time periods used in Table 2 help to more clearly differentiate between short and longer-term needs, with the short-term need running to 2029/30, and the longer-term need covering the period 2030/31 to 2040/41. The time periods used in Table 2 also more closely align with the sites available to meet the permanent pitch needs over the Plan period (with two sites identified to meet the short-term needs as defined in Table 2, and a clear strategy for meeting the longer-term needs, again, as defined in Table 2).

5. Approach to meeting Identified Needs

Gypsy and Traveller pitches (permanent need)

- 5.1. Having established the need to provide for 30 permanent Traveller pitches and at least one new transit site with a capacity to accommodate a minimum of 15 caravans, the Council has explored the available options for meeting these identified needs.
- 5.2. As there are currently no existing permanent or transit sites within the Borough, the Council do not have the option to consider expanding or refurbishing any existing facilities.
- 5.3. Adjoining authorities have been and will continue to be approached under the Duty to Co-operate. However, the one response to date from Redbridge Borough Council confirmed that they do not have the capacity to meet any unmet need arising from Enfield⁴.
- 5.4. The Council has conducted several Call for Sites exercises as a part of the emerging ELP, including a specific Call for Site exercise undertaken in 2022, for Gypsy and Traveller provision. No private site owners came forward to promote sites for any type of Gypsy and Traveller provision. A limited number of Council owned sites were promoted during the Call for Sites in 2022, but these sites were unable to meet the identified need for permanent provision within Enfield.
- 5.5. Following a recent comprehensive internal review by Enfield Council's Property Services, nine council-owned sites have been put forward and assessed specifically for Gypsy and Traveller provision. Some of these sites are new sites, whilst others had been promoted previously and have had their availability re-confirmed.
- 5.6. As a part of the preparation of the emerging ELP, the Council has assessed over 1,200 sites for housing delivery, documented within the Housing and Economic Land Availability Assessment (HELAA)⁵. Many of these sites have been taken forward to help meet the London Plan housing target. Sites within the HEELA not considered suitable for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be unsuitable for meeting Traveller accommodation needs. In addition, these sites have not been promoted for meeting Traveller accommodation needs, and therefore are not considered available.
- 5.7. In addition to the nine Council owned sites, the two strategic rural placemaking areas; Chase Park and Crews Hill, have been included in the assessment for Traveller provision. These broad locations are considered for long-term delivery in line with the emerging Enfield Local Plan Policies PL10: Chase Park and PL11: Crews Hill. At this stage, specific locations for Gypsy and Traveller provision within these broad areas have not been identified.

⁴ Contact was made in September 2023 noting the need identified within the 2020 GTANA. Further contact will be made as part of this additional Regulation 18 consultation.

⁵ The HELAA can be viewed at: enfield.gov.uk/data/assets/pdf_file/0030/54894/Housing-and-Economic-Land-Availability-Assessment-HELAA-April-2023-Planning.pdf

- 5.8. Crews Hill and Chase Park are large, strategic allocations that will require further masterplanning work following adoption of the ELP. It is too premature to identify specific sites at Crews Hill and/ or Chase Park to meet Traveller accommodation needs, as these strategic allocations need to be planned comprehensively. However, given the scale of planned development and the objective of creating new mixed communities, there is clear scope to identify sites through the masterplanning processes for Crews Hill and Chase Park, if necessary, to accommodate the long-term need for permanent pitches.
- 5.9. The TLP and ELP policies also provide a framework for assessing proposals for permanent pitches on sites not allocated in the TLP. This provides flexibility, and should such sites come forward, it may reduce or remove the need for permanent pitch provision at Crews Hill and/ or Chase Park.

Travelling Showpeople plot requirements

- 5.10. As detailed within the TLP Consultation Statement and Enfield GTANA (2024), there is currently no evidence of need for Travelling Showpeople plots. Consequently, a decision was made not to allocate a site for Travelling Showpeople. Similarly, it was decided not to create a separate TLP policy for assessing any future proposals for Travelling Showpeople sites. Instead, Policy H10 (with draft Proposed Main Modifications), along with proposed TLP Policy T2, provide an appropriate policy framework for assessing any planning applications that do come forward for Travelling Showpeople sites.

Transit provision

- 5.11. Currently there is no transit site provision in Enfield. However, LBE has an effective negotiated stopping policy in place. In addition, the use of Sanctuary Stopping is being explored.
- 5.12. The updated GTANA (2024) confirms an ongoing need for spaces where people can stop safely. These protocols will continue to be used alongside the TLP's proposed allocation of a transit site to accommodate at least 15 caravans at any one time.

6. Site Assessments:

- 6.1. Comprehensive details of the full site assessments are provided in the Traveller Site Selection Paper, which can be viewed alongside this Draft Plan. The Council has prepared a Traveller Site Selection Methodology (2024), outlining the approach taken to assess and select sites. Full details of this methodology can be found in Appendix 1 of the Traveller Site Selection Paper. The methodology was subject to public consultation at the issues and options stage in 2023.
- 6.2. All 11 sites (the nine sites promoted by Enfield Council Property Services, and two strategic allocations – Crews Hill and Chase Park) have been assessed in line with the Traveller Site Selection Methodology (2024) to determine their suitability for Traveller provision.
- 6.3. Eight of the nine sites promoted by Enfield Council Property Services are located within the Green Belt or are designated as Metropolitan Open Land (MOL) (which has the same status as the Green Belt). The exception being Land at A10 site. All of Chase Park and most of Crews Hill, are currently designated as Green Belt land, but the ELP proposes releasing land from the Green Belt within these strategic allocations to enable the delivery of planned development.
- 6.4. Any sites proposed for allocation in the TLP on land currently designated as Green Belt or MOL will require full justification, including demonstration of the necessary “exceptional circumstances” for removing land from the Green Belt or de-designating MOL.
- 6.5. The Gypsy and Traveller Site Selection Methodology is set out over six stages:

Stage 1: Identification and initial sift of sites:

- Stage 1a – Identification of sites
- Stage 1b – Assessment of absolute constraints
- Stage 1c – Size Threshold and Planning History

Stage 2: Promoting a Sustainable Pattern of Development

- Stage 2a: Sites considered on a sequential approach directing growth to specific locations

Stage 3: Detailed Planning Assessment

- Stage 3a – Consideration of Technical Constraints
- Stage 3b – Consideration of other non-absolute constraints

Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)

Stage 5: Deliverability

Stage 6: Overall Conclusion

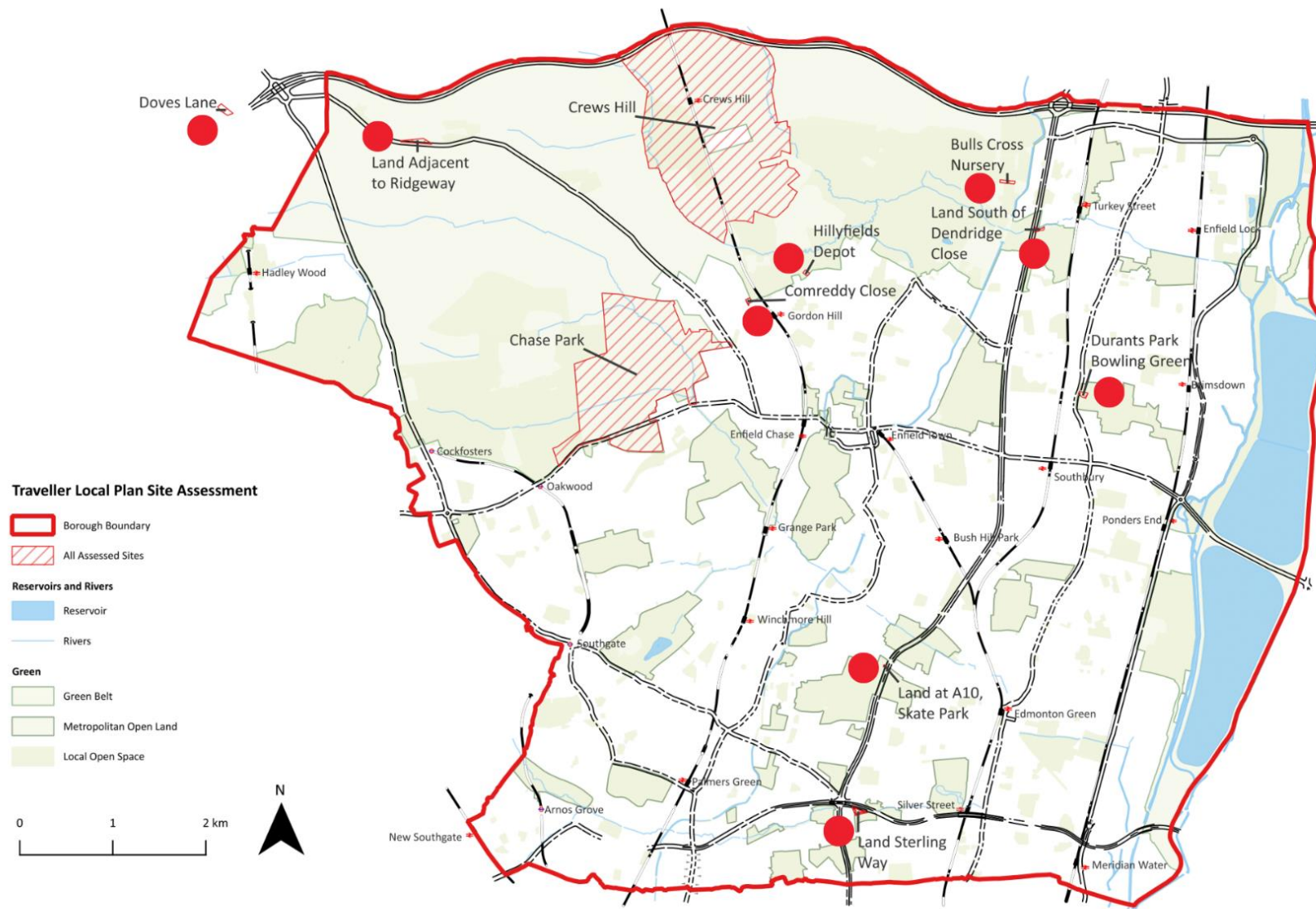
6.6. Whilst the nine sites promoted by Property Services have defined boundaries and can be assessed based on their site-specific characteristics, a different approach is required for Crews Hill and Chase Park. The Masterplanning process for these two placemaking areas, as part of a comprehensive planning approach, will determine the most appropriate location(s) for permanent pitch provision, should such provision be required (see paragraphs 8.14 to 8.17 below).

6.7. The following sites have been assessed as part of this Draft Plan:

- Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)
- Durant's Park Bowling Green (EN3 5JE)
- Land Adjacent to Ridgeway (EN2 8AE)
- Hillyfields Depot & Land (large site) (EN2 0HN)
- Comreddy Close (EN2 8RN)
- Dove Lane, Potters Bar (EN6 2SH)
- Land Sterling Way / Weighbridge (N18 1BH)
- Land south of Dendridge Close (EN1 4PN)
- Land at A10 (N21 2PS)
- Chase Park
- Crews Hill

6.8. Each of the sites are identified within Map 1 below.

Figure 1: All sites assessed.



Integrated Impact Assessment

- 6.9. An Integrated Impact Assessment (IIA) has been carried out to support the development of this Draft Plan. The IIA promotes sustainable development by assessing how well the Draft Plan, when judged against 'reasonable alternatives', will achieve relevant environmental, economic and social objectives. The IIA evaluates alternative site allocation options and draft policies, using a similar approach to that used for the emerging Enfield Local Plan.
- 6.10. The IIA incorporates the Strategic Environmental Assessment (SEA) Regulations⁶, which implement the requirements of the European Directive 2001/42/EC⁷. External consultants have been appointed to carry out the IIA which incorporates the Sustainability Appraisal, Strategic Environmental Assessment, Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment for the Draft Plan.
- 6.11. The IIA summarises the likely overall cumulative effect of the Traveller Local Plan in relation to a range of objectives, including in relation to reducing carbon emissions and addressing climate change, improving health and wellbeing, improving access to facilities and services and protecting the natural and built environment. Whilst for a number of the objectives, the TLP was considered to have a positive or negligible effect, the IIA does identify that the proposed site allocations will have a significant negative effect in relation to minimizing the need to travel and supporting a modal shift away from the private vehicle. This is because the sites proposed for allocation have poor access to public transport, and some are not located in close proximity to a major, district or local centre.
- 6.12. The Council is fully aware of this issue, but the site options available to the Council are very limited, despite several call for sites.
- 6.13. The IIA also includes recommendations in relation to draft Policies TLP1 and TLP2. These recommendations mainly relate to further detail that could be added to the Policies (or related supporting text), and the Council will consider and respond to these recommendations in preparing the next version of the TLP.
- 6.14. The IIA is now subject to consultation with Historic England, Natural England and the Environment Agency and is available to view on the Council's website alongside this Draft Plan.

Site Assessment Summaries

- 6.15. Further to the sites being assessed and the findings of the IIA, Table 3 below sets out whether each site is to be allocated or discounted.

⁶ <https://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

⁷ <https://www.legislation.gov.uk/eudr/2001/42/adopted>

Table 3: Site Assessment Summaries

Site Reference	Site name / address	Estimated pitch capacity ⁸	Overall conclusion
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	10	Allocate - subject to exceptional circumstances paper.
TLP_02	Durant's Park Bowling Green (EN3 5JE)	10	Discount - Greenfield site within the urban area. This site is located within MOL and would result in the loss of Local Open Space. Restrictive covenant on-site preventing change of use.
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	22	Allocate - subject to exceptional circumstances paper.
TLP_04	Hillyfields Depot & Land (large site) (EN2 0HN)	4	Discount - Accessible greenfield site located within the Green Belt. This site is within an area of conservation, MOL, Local Open Space and Metropolitan SINC (insurmountable constraint).
TLP_05	Comreddy Close (EN2 8RN)	5	Discount - Accessible greenfield site located within the Green Belt. Below the minimum site size threshold, inefficient to deliver. The site is currently designated as HRA (Housing Revenue Account, or Housing Service land). The site is also in a built-up residential area.
TLP_06	Dove Lane,	18	Discount - Accessible greenfield site within

⁸ Approximate estimate is based upon the Traveller Site Selection methodology, assuming 6 pitches per 0.3ha. This is subject to specific site constraints and further detailed work will be required by the land promoter.

Site Reference	Site name / address	Estimated pitch capacity ⁸	Overall conclusion
	Potters Bar (EN6 2SH)		the Green Belt, adjacent to an established private GRT site. This site would be subject to Duty to Cooperate with Hertsmere Council.
TLP_07	Land Sterling Way / Weighbridge (N18 1BH)	11	Discount - Accessible greenfield site within the urban area. The site is within an area of Flood Risk and covered by a borough SINC (insurmountable constraint).
TLP_08	Land south of Dendridge Close (EN1 4PN)	6	Discount - Accessible greenfield site located within the Green Belt. The site is located within borough SINC (insurmountable constraint) and MOL.
TLP_09	Land at A10, (N21 2PS)	6 (Transit only)	Allocate - Promoted for transit only
TLP_10	Chase Park	10+	Allocate to potentially help meet long term need - Large strategic site with scope for accommodating mixed communities, including permanent pitch provision (subject to further masterplanning work). Potential for good access to new facilities, services and public transport (as wider development is delivered).
TLP_11	Crews Hill	10+	Allocate to potentially help meet long term need - Large strategic site with scope for accommodating mixed communities, including permanent pitch provision (subject to further masterplanning work). Potential for good access to new facilities, services and public transport (as wider development is delivered).

7. Selecting the preferred sites

- 7.1. In selecting the preferred sites for inclusion in this Draft TLP, the Council has considered feedback from the Issues and Options consultation, the findings of the site assessment work, and the conclusions from the IIA. Despite several calls for sites, no privately owned land has been promoted for Traveller provision. Consequently, the Council has proactively identified several sites within its own ownership that may be suitable for Traveller provision, but nonetheless, the pool of available sites remains relatively small. The available sites have been assessed within this context.
- 7.2. Sites TLP_04 (Hillyfields Depot & Land), TLP_07 (Land Sterling Way / Weighbridge) and TLP_08 (Land south of Dendridge Close) have been discounted due to insurmountable (absolute) constraints⁹.
- 7.3. Site TLP-06 (Dove Lane, Potters Bar) is owned by the Council but located within Hertsmere. Pursuing this option would require demonstrating that Hertsmere cannot meet their own need.
- 7.4. Site TLP_02 (Durant's Park Bowling Green) has a restrictive covenant preventing any change of use and the Council has confirmed that the site is no longer available.
- 7.5. Site TLP- 05 (Comreddy Close) performs well within the assessment but is below the minimum site size threshold and within a built-up residential area. The site is considered to be inefficient in terms of delivery. The site is currently designated as HRA (Housing Revenue Account, or Housing Service land). The site is also in a built-up residential area. Whilst there are good examples of sites within the urban area, many Gypsies and Travellers express a preference for a rural location which is on the edge of or closely located to a large town or city consistent with traditional lifestyles and means of employment. For the above reasons, this site has been discounted.
- 7.6. As a result of discounting the above sites, four sites have been identified to potentially accommodate the identified permanent pitch need. These sites are:
 - TLP_01: Bulls Cross Nursery
 - TLP_03: Land Adjacent to Ridgeway
 - TLP_10: Chase Park
 - TLP_11: Crews Hill
- 7.7. One site has been selected to potentially accommodate transit pitch provision. This site is:
 - TLP_9: Land at A10, (space for a minimum of 15 caravans).
- 7.8. Table 4 summarises the preferred sites for Gypsy and Traveller provision. The approximate estimated pitch capacity is based on a standard formula (see footnote 7b

⁹ The SINC review provides the evidence base to inform the requirements as outlined in the National Planning Policy Framework and the London Plan to protect, enhance and restore sites of biodiversity value and to promote a strategic approach to maintain and enhancing ecological networks so that they more resilient to current and future pressures. More information can viewed here: : <https://www.enfield.gov.uk/services/planning/evidence-base#blue-and-green-enfield>

below). As explained in Section 8 below, the actual pitch capacity will depend on site-specific constraints and opportunities, considering the optimum number of pitches to best meet the Traveller community's needs.

Table 4: Preferred sites selected for Gypsy and Traveller Provision

Site Reference	Site name / address	Proposed use	Approximate estimated pitch capacity ¹⁰
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Permanent pitch provision	8-10
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	Permanent pitch provision	Up to 22
TLP_10	Chase Park	Permanent pitch provision	10+
TLP_11	Crews Hill	Permanent pitch provision	10+
TLP_09	Land at A10, (N21 2PS)	Transit pitch provision	6 (estimated to accommodate between 12 – 18 caravans and vehicles).

¹⁰ Approximate estimate is based upon the Traveller Site Selection Methodology, assuming 6 pitches per 0.3ha. This is subject to specific site constraints and further detailed work will be required by the land promoter.

8. Proposed Site Allocations

- 8.1. The TLP is committed to facilitating the delivery of accommodation to meet the needs of the Travelling community. One of the key responsibilities of the TLP is to determine the quantity, distribution and type of new sites to be provided.
- 8.2. The Council has determined that, to meet the identified Traveller need in the Borough, it will be necessary to manage the amount of planned development and redevelopment on land currently designated as Green Belt.
- 8.3. The Council has tried through several call for sites exercises to identify a range of available and suitable sites to meet Traveller accommodation needs, but the only sites put forward are Council owned sites. Land at A10 (TLP_09), is not within the Green Belt and is not designated as MOL and is considered suitable for transit pitch provision (further site information is provided below).
- 8.4. In terms of meeting the permanent pitch need, the only available and most suitable sites for addressing the shortfall and short-term need (2020/21 – 2029/30) are in the Green Belt (Bulls Cross Nursery, TLP_01, and Land Adjacent to Ridgeway, TLP_03). The Council will give further consideration to the necessary exceptional circumstances for amending the Green Belt boundary to meet the permanent pitch needs, but the key components of the exceptional circumstances case are likely to include:
 - The need for sites to meet Traveller accommodation needs;
 - The lack of available alternative (non-Green Belt sites); and
 - The limited contribution the sites make to Green Belt purposes, and the limited impact on the overall function of the Green Belt in these areas.
- 8.5. To ensure the longer-term need (2030/31 – 2040/41) for permanent pitch provision is met, the Draft TLP proposes allocating a pitch requirement to the broad areas of TLP_10 (Chase Park) and/ or TLP_011 (Crews Hill). As set out above, the masterplanning processes for Crews Hill and Chase Park are expected to be capable of identifying suitable land for permanent pitch provision, although importantly, these pitches will only need to be delivered if alternative provision has not been secured in the meantime. As explained in more detail below, there is potentially scope for additional pitches to be accommodated on the Bulls Cross Nursery Site and on Land Adjacent to the Ridgeway, or indeed, planning applications may be submitted for pitches on land not allocated in the TLP.

Bulls Cross Nursery (TLP-01)

- 8.6. Following the site assessments, the Council is keen to promote Bulls Cross for permanent Traveller accommodation to deliver at least 8 pitches. This would contribute towards meeting some of the shortfall, as well as the short-term need (2020/21 – 2029/30).
- 8.7. Bulls Cross, a Council owned site, would provide between 8 and 10 pitches based on provisional plans. It is anticipated that a planning application will be submitted in 2025 alongside the formal submission of the TLP.

- 8.8. Although Bulls Cross is within the Green Belt, the pressing need to provide sites for the shortfall and short-term need, combined with the lack of other available options is considered to outweigh the impact on the Green Belt. The site is well connected to the road network and has substantial established screening, ensuring privacy for its end users.
- 8.9. As set out within the Traveller Site Selection Paper, the site is within reasonable distance to health and education services, as well as shops and public transport.

Land adjacent to Ridgeway (TLP_03)

- 8.10. The Council is keen to promote this site adjacent to Ridgeway to deliver up to 22 permanent pitches. This would contribute towards meeting some of the shortfall, as well as the short-term need (2020/21 – 2029/30).
- 8.11. It is anticipated that a planning application will be submitted in 2025 alongside the formal submission of the TLP.
- 8.12. Although the site is within the Green Belt, the pressing need to provide sites for the shortfall and short-term Traveller accommodation, coupled with the lack of other available options, is considered to outweigh the impact on the Green Belt. The site is well connected to the road network and offers a substantial area, with the potential to be split into two separate sites. It is well connected to the road network.
- 8.13. It is recognised that this site is relatively isolated, however as noted within the Traveller Site Selection Paper, there is a bus service within 2 minutes' walk of the site which would provide access to health and education services, as well as shops.

Chase Park (TLP_10) and Crews Hill (TLP_11)

- 8.14. The Council has taken the decision to include these two broad locations for potential pitch provision, to help ensure that the identified need for pitches in the period to 2041 is capable of being met in full. Although proposed allocations TLP_01 (Bulls Cross Nursery) and TLP_03 (Land adjacent to Ridgeway) could potentially meet the entire identified need for the Plan period (30 pitches), the true capacity of each site is currently unknown.
- 8.15. Therefore, the TLP proposes setting a pitch requirement for Chase Park and Crews Hill, that will need to be planned for and delivered unless the longer-term permanent pitch need is able to be delivered through additional capacity at TLP_01 and TLP_03, or an alternative site (or sites) comes forward either as part of the TLP, or through a windfall planning application.
- 8.16. ELP Policies PL10 (Chase Park) and PL11 (Crews Hill) support this approach, with reference to the need for traveller pitch provision to be explored on each strategic allocation, subject to the policies and proposals to be set out in the Enfield Traveller Local Plan. It is envisaged that the required masterplanning processes for Chase Park and Crews Hill will identify land suitable for pitch provision, but this pitch provision will only need to be delivered if there is an outstanding longer-term need (i.e. it has not been possible to deliver additional capacity on TLP_01 and TLP_03, and no alternative

site (or sites) have come forward either as part of the TLP, or through a windfall planning application).

8.17. It should be noted that at present, these broad locations cannot be considered available (and are not therefore suitable to meet the identified short-term need) as neither private landowners nor the Council's Property Services have promoted land parcels within these areas.

Land at A10 (TLP_09)

8.18. The Council is keen to promote this site for permanent use as a transit site, providing space for up to 15 caravans. The Traveller Site Assessment Topic Paper states that the site has capacity for up to six pitches. While formal pitches are not required for a transit allocation, the site must be able to accommodate at least 15 caravans and their vehicles. It is estimated that each pitch could accommodate between 2-3 caravans. As such, the site is considered to have the capacity for 12 – 18 caravans and their vehicles.

8.19. The site is previously developed land, with existing hard standing, which is essential for transit needs, and it includes an existing building that could be repurposed as an amenity building.

8.20. To support the allocation of 30 permanent pitches and one transit site, the following Planning Policy is proposed:

POLICY TLP1:	Sites for Travellers
	<ol style="list-style-type: none"> 1. The TLP will provide at least 30 pitches, and 1 transit site in the plan period 2020 – 2041. 2. Sites TLP-01 (Bulls Cross Nursery), TLP-03 (Land Adjacent to the Ridgeway) and TLP-09 (Land at A10) are allocated for traveller use. Sites TLP_10 (Chase Park) and TLP_11 (Crews Hill) are allocated a pitch requirement that should be planned for through the required Masterplanning processes for each strategic site, but the delivery of these pitches will only be required if it has not been possible to meet the long-term pitch needs through other means. 3. The sites allocated to meet traveller needs are defined on the Policies Map below. The sites have been selected on the basis of a methodology which prioritises the development of brownfield sites. 4. Criteria within Policy H10 (Traveler Accommodation) within the emerging ELP, should be applied alongside Policy TLP2 (below) for Traveller sites coming forward either as part of this TLP or as windfall / speculative planning applications. 5. Further information on site allocations is presented on the site proformas in Appendix D. The proformas carry the status of policy and indicate key requirements and considerations that need to be considered as sites come forward for development.

Figure 2: Policies Map showing sites to be allocated.



9. Design of new Traveller Sites

- 9.1. Good design is a key aspect of sustainable development. Although there is limited guidance on the design of new Traveller sites, paragraph 26 of the Planning Policy for Traveller Sites (PPTS) states that sites should be well planned or soft landscaped to positively enhance the environment and increase its openness, with adequate landscaping and play areas for children. It advises against enclosing sites with hard landscaping, high walls or fences.
- 9.2. Detailed guidance was given in ‘Designing Gypsy and Traveller Sites’ (DCLG, 2008)¹¹ although this document was withdrawn in 2015. Nonetheless, it contains useful material on site layout, access and orientation of both permanent and transit sites, as well as site services and facilities. For example, it is essential that each pitch has an amenity building with access to mains water, electricity, a toilet/bathroom, a kitchen and a dining area. It is also important that sites provide visual and acoustic privacy for both people living on the site and those living nearby.
- 9.3. ‘Places we’re proud of’¹² is a short guide to providing and managing sites for Gypsies and Travellers. It explains why high-quality sites are needed, highlights key success factors, and provides examples of good site design in practice.
- 9.4. The option to have a design policy within the TLP was supported at the Issues and options stage. Consequently, the following policy is proposed:

POLICY TLP2:	Design and Site Layout
<p>All sites to be considered through this TLP subsequent planning applications will be required to comply with Policy T1 and the following in so far as they are relevant to the site and its location:</p> <p><u>Access and parking</u></p> <ol style="list-style-type: none"> 1 Provide safe vehicle and pedestrian access from the site to the highway 2 Ensure that there is sufficient turning space within the site to allow for safe vehicular movement 3 Minimise conflict between pedestrians and vehicles on site 4 No vehicle over 3.5 tonnes shall be stationed, parked or stored on site, unless necessary for the use of a Travelling Showpersons site. <p><u>Environmental</u></p> <ol style="list-style-type: none"> 5 Avoid boundary treatment that has a detrimental visual impact on the character of the site and locality 6 Must provide green buffers to the street and the site perimeter to reinforce the 	

¹¹ <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>

¹² <https://www.gypsy-traveller.org/resource/national-policy-advisory-panel-places-were-proud-of/>

- boundary of the site and to provide screening of views into/out of the site;
- 7 Must include communal green with provision for a children's play space, which should be in a central overlooked area
 - 8 Must embed noise mitigation measures into the site design
 - 9 Should provide a horseshoe or circular layout (where this can be achieved)
 - 10 Ensure that the site and the layout proposed on it, would not cause harm to the significance or setting of heritage assets or biodiversity interests.

General

- 11 All permanent pitches must include:
 - Space for touring caravan, mobile home and 2no. cars
 - Private garden to rear of each pitch.
 - Storage space and amenity building with living room, kitchen, WC.
 - Green border demarcating plots
- 12 Transit pitches must include:
 - Space for 2 touring caravans, a mobile home and parking for 2no. cars
 - A utility building with W/C, utility room, kitchen and living room
- 13 Must include a community building and site managers office
- 14 Provide details of wastewater infrastructure and surface water drainage incorporating SUDS where possible
- 15 Ensure that waste is stored appropriately for disposal and able to be collected in an efficient manner
- 16 No commercial activities shall take place on the land, including the storage and sorting of materials, other than as necessary for the use as a travelling showpersons site.
- 17 Minimise external lighting to avoid a detrimental impact on the surrounding locality

In addition to the above, plots for travelling showpersons should have adequate space for the storage and maintenance of equipment and be laid out to avoid conflict between vehicles and residents.

10. Implementation and Monitoring

- 10.1. To support the accommodation needs of the travelling community, the Council will actively monitor the supply of sites and pitches to ensure that a five-year supply of deliverable sites is maintained, as required by legislation. The Council will also regularly review and update the data related to the supply of traveller accommodation through the Authority Monitoring Report which is accessible at: <https://new.enfield.gov.uk/services/planning/monitoring>. This work is supplemented by the bi-annual caravan count.
- 10.2. The monitoring framework at Appendix E outlines how the policies will be monitored, reflecting the objectives expressed in both the Council's strategy and the IIA.

11. Next Steps

- 11.1. After the consultation period, we will collate and review all comments received, which will inform the next stage of the TLP. Any additional sites put forward as part of the 'TLP call for sites' will be evaluated against the agreed Traveller Site Selection Methodology (2024).
- 11.2. In the Spring of 2025, we intend to publish our Regulation 19 Draft Plan. The formal submission of the TLP for examination is anticipated to be in early Summer 2025.

Appendix A: Definitions

Caravans:	Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.
DCLG:	Department for Communities and Local Government; created in May 2006. Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).
Gypsies and Travellers:	<p>Defined by DLUHC Planning policy for traveller sites (December 2023) as:</p> <p><i>“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 or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”</i></p> <p>The planning policy goes on to state that:</p> <p><i>“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:</i></p> <ul style="list-style-type: none"> <i>a. whether they previously led a nomadic habit of life</i> <i>b. the reasons for ceasing their nomadic habit of life</i> <i>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.”</i>
Irish Traveller:	Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (O’Leary v Allied Domecq).
Mobile home:	Legally a ‘caravan’ but not usually capable of being moved by towing.
Negotiated Stopping:	Negotiated stopping is a balanced and humane approach to managing roadside camps, based on a mutual agreement between the local authority and Gypsy and Traveller families on what short term accommodation is appropriate, fair and in the best interests of all residents.
Pitch:	Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. DLUHC Planning policy for traveller sites

	(December 2023) states that “For the purposes of this planning policy, “pitch” means a pitch on a “Gypsy and Traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “Gypsies and Travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment”.
Plot:	See “Pitch” above.
PPTS:	Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions)
Roadside:	Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.
Romany:	Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (CRE V Dutton).
Sheds:	On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/pitch. Some contain a cooker and basic kitchen facilities.
Site:	An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or 'sheds'. An authorised site will have planning permission. An unauthorised development lacks planning permission.
Slab:	An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans).
Stopping places:	A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.
Trailers:	Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.
Transit site:	A site intended for short-term use while in transit. The site is usually

	permanent and authorised, but there is a limit on the length of time residents can stay.
Travelling Showpeople:	Defined by DLUHC Planning policy for traveller sites (December 2023) as “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 dependent’s more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.”
Unauthorised development:	Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not unauthorised encampments in that they cannot trespass on their own land – they are therefore unauthorised developments and enforcement is always dealt with by Local Planning Authorities enforcing planning legislation.
Unauthorised encampment:	Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner’s consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the landowner to take enforcement action in conjunction with the Police.
Wagons:	This is the preferred term for the vehicles used for accommodation by Showpeople.
Yards:	Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as ‘winter quarters’. These ‘yards’ are now often occupied all year around by some family members.

Appendix B: Issues and Options summary of decisions made and justification.

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 need to be considered? Please	Objectives were considered to be appropriate but should include measures for addressing unauthorised encampments and ensuring affordable, culturally suitable accommodation.

Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
	provide information if so.	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.
TLP Plan Period	<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 	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.
Cultural and PPTS need (for permanent provision)	<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>
Travelling Showpeople need	<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>
Policy options to deliver the identified permanent need	<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>

Topics / Issues	Consultation questions / Options:	Consultation feedback and decisions made.
	<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>

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.

Appendix C: Draft Policy H10 within the emerging ELP

ENFIELD DRAFT LOCAL PLAN
REGULATION 19 MARCH 2024

DEVELOPMENT MANAGEMENT POLICY

H10: TRAVELLER ACCOMMODATION

1. The Council will meet the identified need of at least 21 pitches over the plan period, for Traveller accommodation through the Traveller Local Plan.
2. Proposals for both transit and permanent provision including plots for Travelling Showpeople, will be required to demonstrate the following:

Location and connectivity

 - a. the site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;
 - b. the site provides convenient access to health care, retail and education school facilities with available capacity;

Impact on environment and heritage

 - c. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

Occupational suitability

- d. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

Safe access

- e. the site can be safely accessed by pedestrians, caravans and other vehicles;

Integration with surrounding area

- f. the layout and boundary treatments of the development aim positively integrate with the adjacent townscape/communities; and

On site utility provision

- g. The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.

3. Due to the nature of this housing need, the Council will maintain continuing cooperation with neighbouring local planning authorities to identify the appropriate need and facilitate necessary provision.



EXPLANATION

- 8.76 Travellers are an integral part of the diverse community within the Borough, and their particular housing needs must be addressed. To proactively plan for and address these needs, a separate Traveller Local Plan is currently being prepared. This plan is informed by the Gypsy and Traveller's Accommodation Assessment (GTAA) 2020, which identifies a cultural need of 23 pitches (of which 21 align with the PPTS's⁴⁷ requirement of 21 pitches) over the plan period. The Traveller Local Plan Issues and Options consultation was consulted on between September – November 2023. Responses are currently being considered and the Traveller Local Plan will be updated accordingly. The next anticipated round of consultation is due to start in Spring 2024, which will explore the potential allocation of sites to meet the identified need and justify the preferred options going forward.
- 8.77 While the Traveller Local Plan is in preparation, it is crucial to provide policy guidelines to consider planning applications that may be submitted before the Traveller Local Plan is adopted. In line with best practices outlined in the PPTS, locally specific criteria should be used to guide both the allocation of sites in plans and formulating policies to assess planning applications which come forward on unallocated sites.

⁴⁷ Planning Policy for Traveller Sites - <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

Policy H10 of the Regulation 19 Enfield Local Plan is copied below, with possible amendments shown. Any amendments to Policy H10 would be at the direction of the Inspector (or Inspectors) presiding over the ELP Examination.

Text that could be deleted is shown as ~~strikethrough text~~, and new text that could be added, is shown in **bold and underlined**.

The possible changes to Policy H10 would update the Policy to reflect the latest evidence (GTANA 2024). The possible changes would also address some drafting issues and ensure alignment between the ELP and TLP.

ELP Policy H10: Traveller Accommodation

1. The Council will meet the identified need of at least 24 **30** pitches over the plan period, for Traveller accommodation through the Traveller Local Plan.
2. **Unless on a site allocated in the Traveller Local Plan, P**proposals for both transit and permanent provision (~~including plots for Travelling Showpeople~~), will be required to demonstrate the following:

Location and connectivity

- a. the site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;
- b. the site provides convenient access to health care, retail and education school facilities with available capacity;

Impact on environment and heritage

- c. **the impact on the landscape, heritage assets, biodiversity or visual character and amenity of the area, particularly the Green Belt is carefully considered to ensure no harm is caused** ~~the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;~~

Occupational suitability

- d. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

Safe access

- e. the site can be safely accessed by pedestrians, caravans and other vehicles;

3. **All proposals (including on sites allocated in the Traveller Local Plan) for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople will be required to demonstrate the following:**


Integration with surrounding area

- f. the layout and boundary treatments of the development aim **to** positively integrate with the adjacent townscape/**landscape and** communities; and

On site utility provision


- g. The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.
- 4.** Due to the nature of this housing need, the Council will maintain continuing cooperation with neighbouring local planning authorities to identify the appropriate need and facilitate necessary provision.

Appendix D – Site Allocation Proforma – TLP_01

Bulls Cross Nursery	
	
Existing site information	
Address	Bulls Cross Nursery, Bulls Cross, Enfield (approximate postcode EN1 4RJ)
Site Area	0.479ha
Existing use(s)	Vacant site
Current ownership(s)	LBE
Site considerations	
Flood Zone	No
PTAL	0
Heritage considerations	None
Impacts on Archaeological Priority Area	Within the Archaeological Priority Area

Proposal			
Land Use Requirements	Permanent Gypsy and Traveller pitch provision		
Implementation			
Timeframe(years)	0-5 (Insert TLP year)	5-10 (Insert TLP year)	10+(Insert TLP year)
Approximate Estimated Pitch capacity	10		
Proposal			
Delivery requirements			
Design Principles	See Draft Policy T2.		

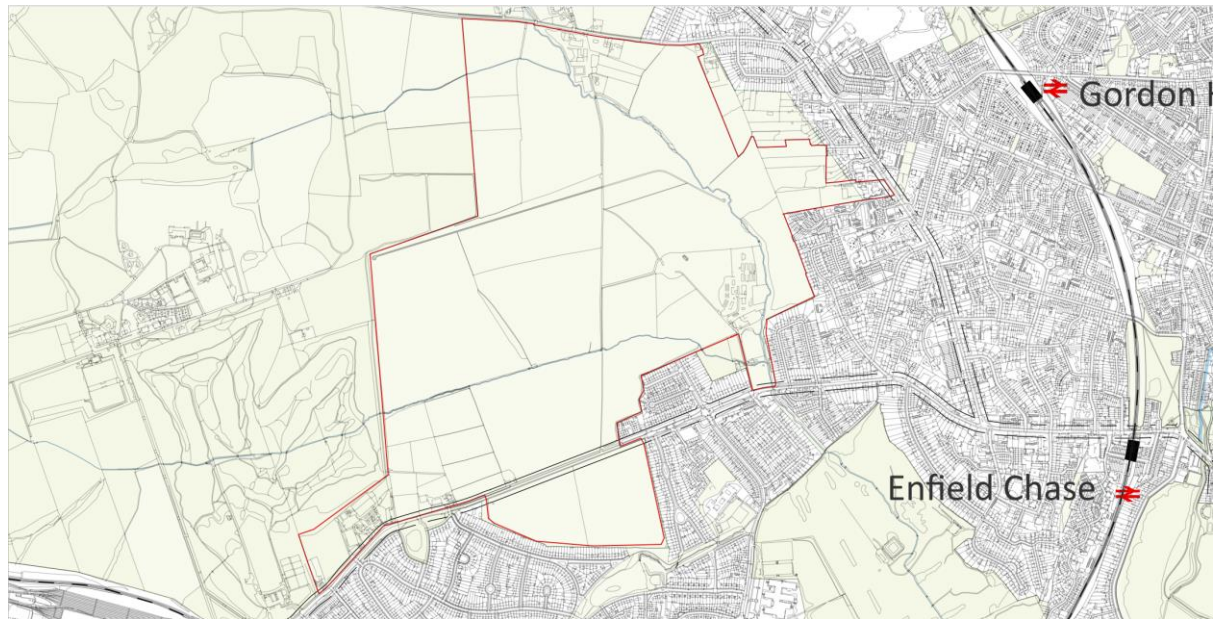
Appendix D – Site Allocation Proforma – TLP_03

Land Adjacent to Ridgeway	
	
Existing site information	
Address	Land Adjacent to Ridgeway (approximate postcode EN2 8AE)
Site Area	1.095ha
Existing use(s)	Vacant site
Current ownership(s)	LBE
Site considerations	
Flood Zone	No
PTAL	1a
Heritage considerations	None
Impacts on Archaeological Priority Area	Within the Archaeological Priority Area

Proposal			
Land Use Requirements	Permanent Gypsy and Traveller pitch provision		
Implementation			
Timeframe(years)	0-5(Insert TLP year)	5-10 (Insert TLP year)	10+(Insert TLP year)
Approximate Estimated Pitch capacity	22		
Proposal			
Delivery requirements			
Design Principles	See Draft Policy T2.		

Appendix D – Site Allocation Proforma – TLP_10

Chase Park



Existing site information

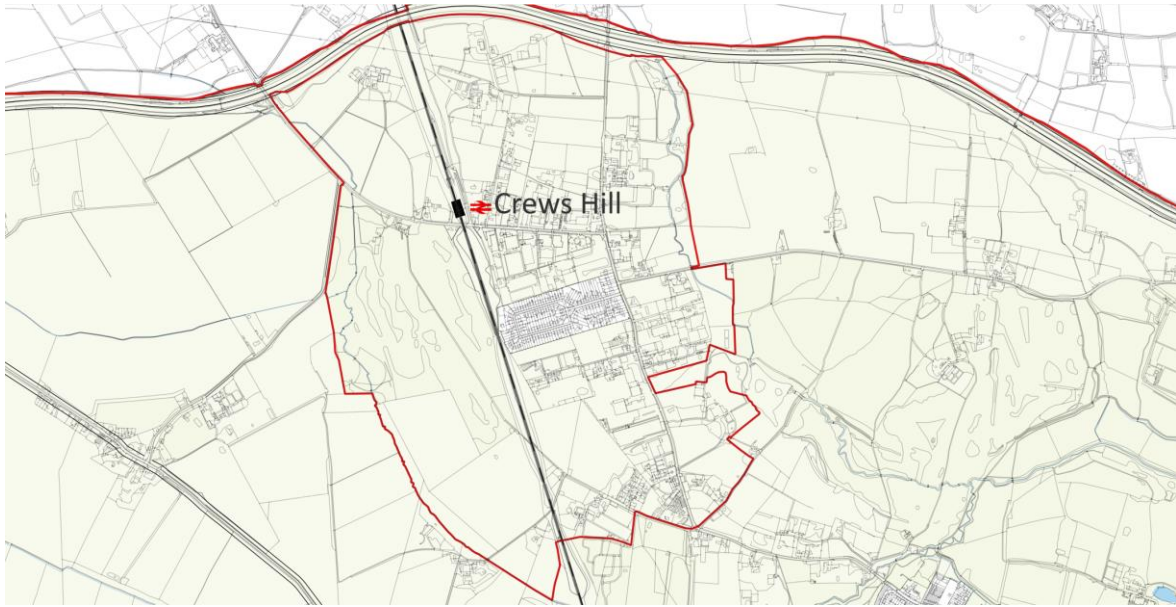
Address	Chase Park (Placemaking Area)
Site Area	167ha
Existing use(s)	Mixed use
Current ownership(s)	Multiple

Site considerations

Flood Zone	Partial Flood Zone 2 and 3
PTAL	Mixed 0, 1a, 1b, and 2
Heritage considerations	<p>Adjacent to Trent Park Conservation Area</p> <p>Trent Park is a Grade II listed Park and Garden</p> <p>Southwest corner is close to Oakwood Underground Station which is Grade II* listed</p> <p>16 Locally Listed Heritage Assets fall within or 500m</p>


	from the Chase Park boundary		
Impacts on Archaeological Priority Area	The Placemaking Area is designated as an Archaeological Priority Area together with the wider rural landscape.		
Proposal			
Land Use Requirements	Potentially 10+ pitches		
Implementation			
Timeframe(years)	0-5(Insert TLP year)	5-10 (Insert TLP year)	10+(Insert TLP year)
Approximate Estimated Pitch capacity			10+
Proposal			
Delivery requirements	We are allocating pitch provision to Chase Park with the site or sites for permanent pitch provision to be determined through the required masterplanning work for this strategic site.		
Design Principles	See Draft Policy T2.		

Appendix D – Site Allocation Proforma – TLP_011

Crews Hill	
	
Existing site information	
Address	Crews Hill (Placemaking Area)
Site Area	279.3ha
Existing use(s)	Mixed use
Current ownership(s)	Multiple
Site considerations	
Flood Zone	Partial Flood Zone 2 and 3
PTAL	Mixed 0, 1a, and 1b
Heritage considerations	<p>Clay Hill Conservation Area is adjacent to the Crews Hill placemaking area with Forty Hill and Trent Park in near surroundings.</p> <p>Three Grade II listed parks and gardens are found in the southwest and east.</p>
Impacts on Archaeological	The Placemaking Area is designated as an

Priority Area	Archaeological Priority Area together with the wider rural landscape.		
Proposal			
Land Use Requirements	Potentially 10+ pitches		
Implementation			
Timeframe(years)	0-5(Insert TLP year)	5-10 (Insert TLP year)	10+(Insert TLP year)
Approximate Estimated Pitch capacity			10+
Proposal			
Delivery requirements	We are allocating pitch provision to Crews Hill with the site or sites for permanent pitch provision to be determined through the required masterplanning work for this strategic sites.		
Design Principles	See Draft Policy T2.		

Appendix D – Site Allocation Proforma – TLP_09

Land at A10	
	
Existing site information	
Address	Land at A10 (approximate postcode N21 2PS)
Site Area	0.17ha
Existing use(s)	Vacant plot
Current ownership(s)	LBE
Site considerations	
Flood Zone	No
PTAL	2
Heritage considerations	Close to locally listed sites (Edmonton cemetery and Cemetery House)
Impacts on Archaeological Priority Area	None

Proposal			
Land Use Requirements	Transit pitches for Gypsy and Traveller provision		
Implementation			
Timeframe(years)	0-5(Insert TLP year)	5-10 (Insert TLP year)	10+(Insert TLP year)
Approximate Estimated Pitch capacity	6 ¹³ (12 -18 caravans)		
Proposal			
Delivery requirements			
Design Principles	See Draft Policy T2		

¹³ Based on the Traveller Local Plan Site Selection Methodology this site could provide 6 pitches would each have the capacity for 2-3 caravans.

Appendix E: Monitoring Framework

The Monitoring Framework sets out how the delivery of the policies will be monitored. The key aims of the policy (target/direction) are listed against how it will be monitored (indicator), and where the information will come from. The performance of policies will be reported as part of the Authority Monitoring Report (AMR) at the end of each monitoring year (1st April to 21st March).

Policy T1: Sites for Travellers		
Spatial Objective / Council Strategy Outcome		IIA Objectives
Housing, Environment, Health and Happiness, Business		Building Communities, Housing, Transport, Health, Economy and Employment, Landscape and Soils
TARGET / DIRECTION	INDICATOR	SOURCE
Provide enough sites to meet the identified need.	Number of sites allocated, granted permission or completed for the identified use	The primary data will be derived from the London Kibana Datahub and published within the AMR.

Policy T2: Design and Site Layout		
Spatial Objective / Council Strategy Outcome		IIA Objectives
Housing, Environment, Health and Happiness, Business		Building Communities, Housing, Transport, Health, Economy and Employment, Landscape and Soils
TARGET / DIRECTION	INDICATOR	SOURCE
All sites allocated or granted permission are done so in line with the policy criteria.	Number of sites allocated or granted permission for the identified use that comply with the policy requirements.	The primary data will be derived from the London Kibana Datahub and published within the AMR.