

Traveller Local Plan

Site Selection Paper

June 2024

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1. Introduction

This paper sets out the site selection undertaken for gypsy, traveller and travelling showpeople and forms a part of the evidence base underpinning the draft Traveller Local Plan.

The paper sets out the objectively assessed need for gypsy and traveller sites within the London Borough of Enfield during the Traveller Local Plan period, setting out sites that have been considered to accommodate the identified need, how these sites have been assessed and the preferred sites to accommodate the identified need within the Traveller Local Plan period.

Two sites have been selected to potentially accommodate immediate permanent pitch provision. These sites are:

- Bulls Cross Nursery, Bulls Cross, Enfield, EN1 4RJ (TLP_01)
- Land Adjacent to Ridgeway, EN2 8AE (TLP_03)

Two sites have been selected to potentially accommodate future pitch provision. These sites are:

- Chase Park (Broad location) (TLP_10)
- Crews Hill (Broad location) (TLP_11)

One site has been selected to potentially accommodate transit pitch provision. This site is:

- Land at A10, N21 2PS (TLP_09)

Local Evidence of Need

The Council has prepared an updated Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTANA)(2024) which identifies the level of need for pitches within the borough of Enfield from 2020/21 to 2040/41 (See table 01).

Permanent Gypsy and Traveller Sites

Table 01: Gypsy and Traveller pitch need 2020/21 to 2040/41¹

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

There is a need for 30 permanent pitches over the Traveller Local Plan Period.

Transit provision

The updated Enfield GTNAA (2024) identifies there is a need for land for permanent stop over provision. There is a need to accommodate at least 15 caravans at one time. This need could be accommodated through a transit site or stop over location(s) identified by the local authority.

¹ Gypsy and Traveller Needs Assessment (2024)

Travelling Showpeople

The Enfield GTANA (2024) has not evidenced any need for additional Travelling Showperson plots in the Borough. However, it is recommended that the Council should respond to any emerging need over the plan period through its planning policy.

2. Identifying Sites

Identifying Sites for Assessment

The Council has run several Call for Sites (CFS) exercises as a part of the emerging Enfield Local Plan, including a Call for Sites exercise undertaken in 2022, specifically seeking sites for Gypsy and Traveller provision. However, no private site owners have come forward to promote sites for any type of gypsy and traveller provision through the Call for Sites exercises. A limited number of Council owned sites were promoted during the CFS 2022; however, these sites were unable to meet the identified need for permanent or transit provision within Enfield.

Following a recent comprehensive review of Council owned sites by Enfield Council Property Services 9 sites have been promoted and have been assessed specifically for gypsy and traveller provision.

As a part of the preparation of the emerging Enfield Local Plan (2019 – 2041), the Council has assessed over 1,200 sites for housing delivery, which are contained within the Housing and Economic Land Availability Assessment (HELAA)². Housing sites contained within the HELAA have not been considered as a part of the assessment for gypsy and traveller provision because these sites have not been promoted for this specific provision and therefore cannot be considered available.

In addition to the 9 Council owned sites, the two strategic rural place making areas; Chase Park (TLP_10) and Crews Hill (TLP_11), have been included within the assessment of sites for potential gypsy and traveller provision. These broad locations have been considered to help potentially meet the longer-term need for pitch provision, in line with emerging Local Plan Policies PL10 and PL11. It should be noted that at this stage of the assessment process, specific locations for gypsy and traveller provision within the broad locations have not been identified.

Table 02: Sites Assessed for Gypsy and Traveller Provision

Site Reference	Site name / address	Ward	Site source
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Whitewebbs	Submitted through CFS 2022
TLP_02	Durant's Park Bowling Green (EN3 5JE)	Brimmsdown	Submitted via LBE property
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	Ridgeway	Submitted via LBE property
TLP_04	Hillyfields Depot & Land (large site) (EN2 0HN)	Whitewebbs	Submitted via LBE property
TLP_05	Comreddy Close (EN2 8RN)	Ridgeway	Submitted via LBE property
TLP_06	Dove Lane, Potters Bar (EN6 2SH)	N/A – located in Hertsmere	Submitted via LBE property
TLP_07	Land Sterling Way / Weighbridge (N18 1BH)	Upper Edmonton	Submitted via LBE property
TLP_08	Land south of Dendridge Close (EN1 4PN)	Bullsmoor	Submitted via LBE property
TLP_09	Land at A10, (N21 2PS)	Bush Hill Park	Submitted via LBE property
TLP_10	Chase Park	Ridgeway/Cockfosters/Oakwood	ELP Place Making area (ELP Policy 10)
TLP_11	Crews Hill	Whitewebbs/Ridgeway	ELP Place Making area (Policy 11)

² The Housing and Economic Land Availability Assessment (2023) (HELAA) has been published as a part of the Enfield Local Plan evidence base: https://www.enfield.gov.uk/__data/assets/pdf_file/0030/54894/Housing-and-Economic-Land-Availability-Assessment-HELAA-April-2023-Planning.pdf

Site Selection methodology

A Gypsy and Traveller Site Selection Methodology³ has been prepared by the Council which sets out the approach taken to assess sites for selection. Full details of the Gypsy and Traveller Site Selection Methodology can be found in Appendix 1.

All 11 sites (9 sites and 2 broad locations) have been assessed in line with the Gypsy and Traveller Site Selection Methodology (2024) to assess their potential suitability for allocation specifically for gypsy and traveller provision.

The criteria proposed to be used for the Gypsy and Traveller Site Selection Methodology address the London Plan, assessing sites against multiple criteria which seek to ensure that identified sites are “well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood” (London Plan Para 4.14.1).

The Gypsy and Traveller Site Selection Methodology is set out over six stages, summarised below, and detailed in full in Chapter 3 of the Gypsy and Traveller Site Selection Methodology (see Appendix 1):

Stage 1: Identification and initial sift of sites

Stage one of the Site Selection methodology is formed of three stages:

- Stage 1a. Identification of sites
- Stage 1b: Assessment of absolute constraints
- Stage 1c: Size threshold

Stage 1a – Identification of sites

All sites identified have been promoted directly through the Council’s Property Services, in addition to the assessment of two strategic rural place making areas. No sites have been promoted to the Council for Gypsy and Traveller provision from private landowners.

Stage 1b – Assessment of absolute constraints

The 11 identified sites have been assessed against absolute constraints (Level 1 constraints), which are informed by national and local policy designations. A full list of absolute constraints can be viewed in table 3, below. Sites lying wholly within a Level 1 constraint area are excluded and considered not to have any reasonable development potential.

Table 03: Sites to be excluded under Stage 1b

Absolute constraints (Level 1) – To be excluded
Sites within the functional floodplain (Flood Zone 3b)
Special Areas of Conservation (SAC)
Sites of special scientific interest (SSSI)
Special Protection Area (SPA)
Ramsar sites
National Nature Reserves (NNR)
Ancient Woodland Suitable Alternative Natural Greenspace (SANG)
Grade 1 and 2 agricultural land

Stage 1c – Size Threshold and Planning History

As set out in the Gypsy and Traveller Site Selection Methodology (2024), sites that fall below 0.3ha (i.e. not capable of accommodating at least 6 pitches) have been excluded as potential allocations for gypsy and traveller provision. The Enfield GTANA (2024) notes that it is generally accepted

³ Gypsy and Traveller Site Selection Methodology (2024): See Appendix 1 of this paper.

amongst the travelling community that sites of 6 to 10 pitches are the most appropriate in size.

At this stage the planning status of the site is also assessed. The criteria exclude sites that have live planning permissions for housing, except in instances where permissions have lapsed, or where the permissions are for gypsy & traveller accommodation.

At this stage, 3 sites were omitted from further consideration for potential allocation for permanent provision as they were below the minimum size threshold for consideration:

- Hillyfields Depot & Land, EN2 0HN (TLP_04)
- Comreddy Close, EN2 8RN (TLP_05)
- Land south of Dendridge Close, EN1 4PN (TLP_08)

It should be noted that one site that falls below the 0.3ha threshold for consideration has been identified as suitable for transit provision with the capacity to provide 6 transit pitches. This site has been specifically promoted for transit provision:

- Land at A10, N21 2PS (TLP_09)

Stage 2: Promoting a Sustainable Pattern of Development

The remaining 8 sites were taken forward to Stage 2 of the site assessment, where consideration is given to their location, and whether there are existing buildings on the sites.

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

The allocation of land promoted for gypsy and traveller provision will be prioritised in the urban area, with an emphasis on brownfield sites, but will take account of the identified preferences of the travelling community identified in the GTANA. Promoted sites were assessed against prioritisation criteria, set out in Appendix 1 (table 3).

The NPPF aims to promote patterns of development which make the fullest possible use of public transport, walking and cycling, thereby minimising the need to travel.

Stage 3: Detailed Planning Assessment

Sites promoted for gypsy and traveller provision at this stage have been assessed to ensure they meet the specific requirements for Gypsy and Traveller provision.

Stage 3a – Consideration of Technical Constraints

This stage involves consideration/assessment of the physical and environmental constraints of promoted sites in accordance with Planning Practice Guidance.

At this stage where significant environmental and/or physical constraints are identified, sites will not be taken forward for further consideration.

Stage 3b – Consideration of other non-absolute constraints

The assessment of sites at this stage comprises of the consideration of several key criteria including Green Belt, flood risk, and highways. In addition, the potential impact on landscape, historic assets ecological designations, utilities, education, and health facilities also needs to be considered.

The Gypsy and Traveller Site Selection includes assessment criteria of non-absolute constraints, which identify the sites specific suitability of Gypsy and Traveller provision. Sites will be assessed against how they perform against the various criteria and whether constraints can be overcome for

each site. This approach ensures selecting sites that will meet the specific needs of the Gypsy and Traveller community. A full list of assessment considerations can be found in Appendix 1, table 4 and includes consideration given to:

- Access to Road networks (good vehicle/pedestrian access from highway);
- Site access – including no overhead cables, side access width;
- Access to health services, schools, shops and public transport;
- Access to utilities (mains water, electricity, sanitation on site or able to be provided);
- Acoustic privacy.

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

The Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of the Traveller Local Plan and is a key part of the evidence base of the Traveller Local Plan. The SA is integrated in the Integrated Impact Assessment (IIA) which will also include the following assessments:

- Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)
- Habitat Regulations Assessment (HRA)
- Equalities Impact Assessment (EqIA)
- Health Impact Assessment (HIA)
- Community Safety Impact Assessment (CSIA)

Sites have been considered against the objectives included in the Regulation 19 IIA (2023). The full list of IIA objectives are set out in Appendix 1 of the Traveller Local Plan Site Selection Methodology, located under its Appendix 3.

Sites taken forward for potential allocation have been fully informed by the overall outcomes of the IIA testing as a qualitative assessment in addition to other evidence that emerges through or outside of the site assessment process.

Stage 5: Deliverability

At this stage sites have been considered for their deliverability within the Traveller Local Plan period, including timescales and phasing of delivery, full details of this stage can be found in Appendix 1, Traveller Local Plan Site Selection Methodology. The assessment includes consideration of:

- Land ownership (e.g. private site put forward for Gypsy and Traveller use);
- Site infrastructure and delivery issues (e.g mitigation measures required to meet specific site requirements such as utilities);
- Barriers to delivery (e.g the site has been identified as a suitable site allocation for housing - specifically gypsy and traveller provision);
- Delivery approaches;
- Site capacity taking into account constraints and other relevant factors (e.g that sites are likely to be delivered within the timeframes of the GTANA 2024 or within the Traveller Local Plan Period).

At this stage, Durant's Park Bowling Green, EN3 5JE (YLP_02) was identified as not deliverable due to legal issues associated with the site and could no longer be considered available. Appendix 3, Table 9 sets out the full list of assessed excluded sites.

Stage 6: Overall Conclusion

The final stage of the process is to draw conclusions and to make recommendations about the suitability of each site for inclusion as a proposed allocation in the Traveller Local Plan. These will be based on professional judgement and take account of:

- Suitability;
- Whether the land is previously developed land, and/or in the urban area;
- Accordance with the emerging spatial strategy;
- Sustainability Appraisal;
- Emerging Draft Local Plan Policy requirements;
- Deliverability of Sites; and
- Any other relevant factors.

Table 04, below, sets out the preferred sites for gypsy and traveller provision.

Table 04: Full list of preferred sites for allocation

Site Reference	Site name / address	Approximate estimated pitch capacity ⁴	Overall conclusion
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (<i>EN1 4RJ</i>)	10	Allocate - subject to exceptional circumstances.
TLP_03	Land Adjacent to Ridgeway (<i>EN2 8AE</i>)	22	Allocate - subject to exceptional circumstances.
TLP_09	Land at A10 (<i>N21 2PS</i>)	6 (Transit only)	Allocate - Promoted for transit only
TLP_10	Chase Park	10+	Allocate a pitch requirement – with delivery subject to pitch need not being met via other means.
TLP_11	Crews Hill	10+	Allocate a pitch requirement – with delivery subject to pitch need not being met via other means.

⁴ Approximate estimate is based upon the Gypsy and Traveler 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.

3. Selecting preferred sites

As no private landowners have promoted sites for Gypsy and Traveller provision, the Council has taken a proactive approach and identified several sites within its own ownership. Two sites have been identified to potentially accommodate the identified immediate permanent pitch need, and one site has been identified to potentially accommodate the identified immediate transit need within the Borough. A further two broad locations have been identified to potentially meet future pitch need within the Borough (should the longer-term pitch need not be met through other means).

The two sites selected to potentially accommodate immediate permanent pitch provision are:

- Bulls Cross Nursery, Bulls Cross, Enfield, EN1 4RJ (TLP_01)
- Land Adjacent to Ridgeway, EN2 8AE (TLP_03)

Land Adjacent to Ridgeway, EN2 8AE (TLP_03) is a relatively isolated site, however, it has the capacity to deliver a significant proportion of the immediate need for pitch provision, and the available alternative options are limited. In addition, the site will have improved access to amenities once the Crews Hill and Chase Park Place Making areas come forward.

Two sites have been selected to potentially accommodate future pitch provision. These sites are:

- Chase Park (Broad location) (TLP_10)
- Crews Hill (Broad location) (TLP_11)

One site has been selected to potentially accommodate transit pitch provision. This site is:

- Land at A10, N21 2PS (TLP_09)

Chase Park and Crews Hill have been identified as preferred 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. Therefore, it is proposed to set 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) come forward either as part of the TLP, or through a windfall planning application.

Table 04: Preferred Sites selected to meet immediate Gypsy and Traveller Provision

Site Reference	Site name / address	Proposed use	Approximate estimated pitch capacity ⁵
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Permanent pitch provision	10
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	Permanent pitch provision	22
TLP_09	Land at A10 (N21 2PS)	Transit pitch provision	6 (Transit only)

⁵ Approximate estimate is based upon the Gypsy and Traveler 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.

Table 05: Preferred sites selected to potentially meet longer-term Gypsy and Traveller needs

Site Reference	Site name / address	Proposed use	Approximate estimated pitch capacity ⁶
TLP_10	Chase Park	Permanent pitch provision / Transit pitch provision	10+
TLP_11	Crews Hill	Permanent pitch provision / Transit pitch provision	10+

⁶ Approximate estimate is based upon the Gypsy and Traveler 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.

London Borough of Enfield

Traveller Site Selection Methodology (update)

September 2024

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Traveller Site Selection Methodology (SSM) Consultation

This document sets out the supplementary criteria to be used at each stage of the Site Selection process for the identification of land suitable to deliver Gypsy and Traveller accommodation to meet the identified need in Enfield.

These criteria will be used to identify potential sites for allocation in the emerging Traveller Local Plan (TLP).

A full list of the supplementary criteria to be used in assessing the suitability of sites for Gypsy and Traveller can be viewed at Appendix 1. The table sets out a full list of Housing and Economic Land Availability Assessment (HELAA) criteria that will form the assessment of sites alongside supplementary criteria to identify site potential suitability of land for Gypsy and Traveller site allocations.

The consultation is specially to review assessment criteria that will be used to identify land suitable for Gypsy and Traveller Site Allocations in the New Local Plan. The HELAA criteria noted in Appendix 1 has been consulted on and has been included to form a comprehensive overview and picture of information that will support the assessment process at each assessment stage.

Comments should be submitted to the council via email to travellerlocalplan@enfield.gov.uk.

What comments do you have on the proposed supplementary criteria to be used to assess the suitability of land for Gypsy and Traveller pitches at:

- **Stage 1;**
- **Stage 2; and**
- **Stage 3.**

Are any 'material planning considerations' that would be relevant to the development of Gypsy and Traveller accommodation that are not captured as part of the proposed G&T SSM.

Are there any proposed criteria in the G&T SSM that are unnecessary and could jeopardise the selection of sites for the Gypsy and Traveller community verses the settled community?

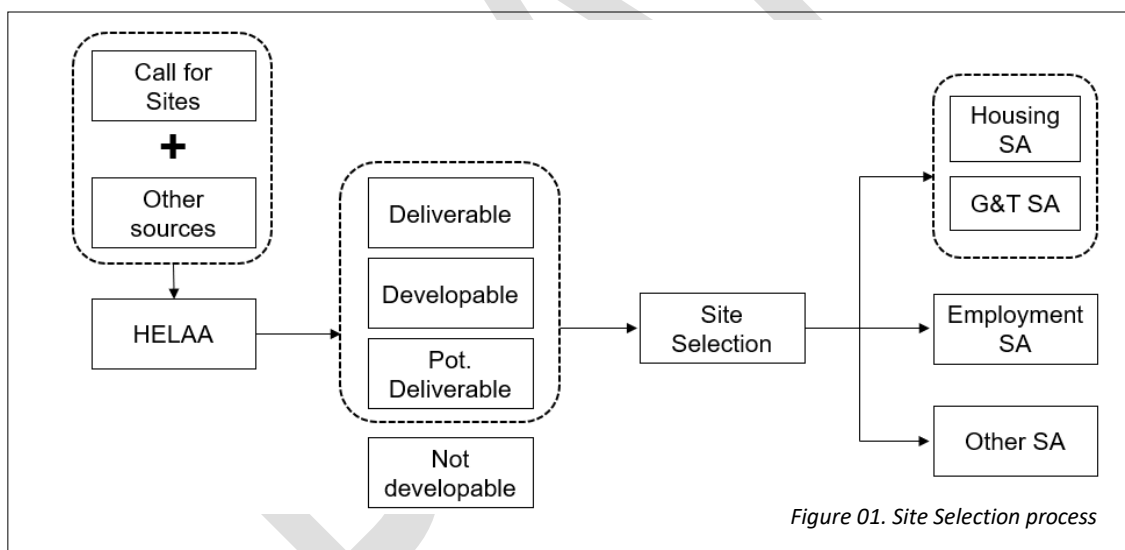
Could any proposed G&T criteria be combined and/or simplified to streamline the process of assessing sites for Gypsy and Traveller accommodation?

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1. Introduction

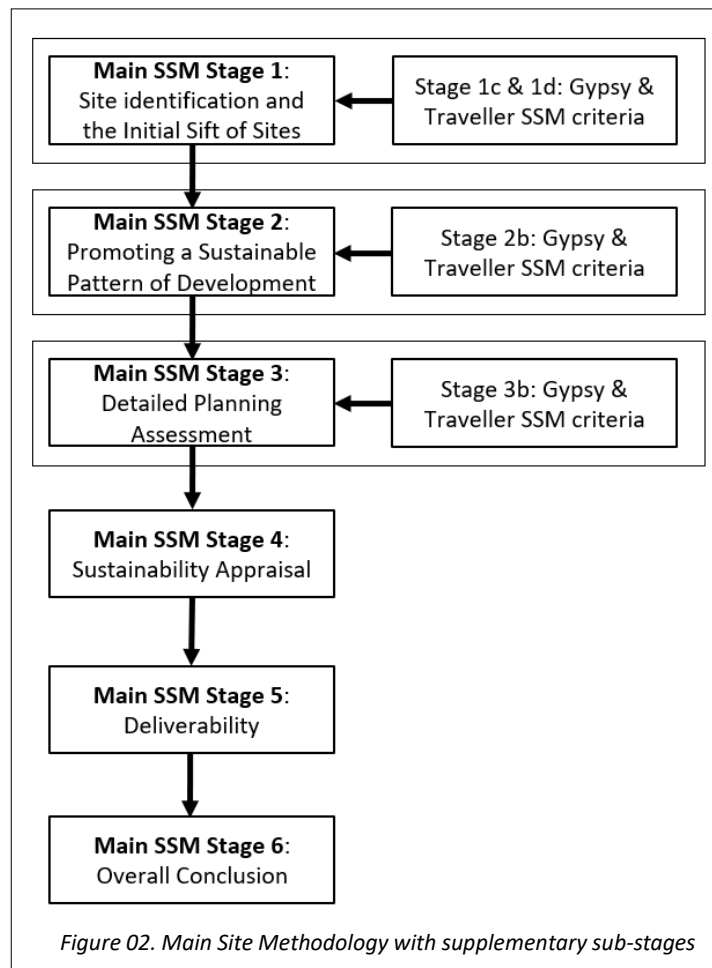
- 1.1 Enfield Council is currently preparing a new Local Plan. Once adopted the policies and proposals within the plan will guide development and help to decide on planning applications and other planning related matters during the plan period up to 2039.
- 1.2 The new Local Plan will identify how much development the borough needs throughout the plan period and where this should be located. The new Local Plan will be required to allocate sufficient land in appropriate locations to meet the identified housing need - including for Gypsies and Travellers - as well as for employment and other needs.
- 1.3 As a part of the Enfield Local Plan evidence base, the Council has published its Gypsy and Traveller Needs Assessment (GTANA) (2020) which sets out the quantity and type of Traveller accommodation needed within the borough over its plan period.
- 1.4 This document sets out the proposed methodology that will be used to identify sites for their suitability to deliver Gypsy and Traveller accommodation in Enfield over the plan period. The Gypsy and Traveller Site Selection Methodology (G&T SSM) will be a supplementary assessment to the main Site Selection Methodology (February 2021)¹ (see figure 01, below). It should be read alongside the Site Selection Methodology (SSM) for residential and employment uses and sets out the points at which the G&T SSM will interact with the SSM. (see figure 02, overleaf).



- 1.5 Sites will be identified using the Housing and Economic Land Availability Assessment (HELAA) as set out in paragraph 3.2 of the main Site Selection Methodology and any future Call for Sites.
- 1.6 The council is seeking views on the proposed G&T SSM criteria (see Appendix 1). The consultation will give stakeholders an opportunity to participate in refining the methodology before it is applied to potential sites.

¹ [LBE Main Site Selection Methodology \(contained in Appendix A of Housing Topic Paper\)](#)

1.7 Responses received during the consultation informed the preparation of the final version of the G&T SSM. A summary of how consultation comments received have been considered will be published within the finalised G&T SSM.



Report Structure

1.8 This report sets out the Councils' proposed Site Selection Methodology for identifying sites to meet its identified need for Gypsies and Travellers.

- Chapter 2 sets out a summary of the Planning Policy Context
- Chapter 3 sets out an overview of the Gypsy and Traveller Site Selection Methodology.
- Chapter 3 also sets out the detailed stages of the Gypsy and Traveller Site Selection Methodology:
 - Stage 1: Site identification and the Initial Sift of Sites;
 - Stage 2: Promoting a Sustainable Pattern of Development;
 - Stage 3: Detailed Planning Assessment
 - Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)
 - Stage 5: Deliverability
 - Stage 6: Overall Conclusion

2. Planning Policy Context and Evidenced Need

2.1 The Enfield Gypsy and Traveller Needs Assessment (GTANA) (2020) contains a comprehensive summary of the planning policy context relevant to Gypsy and Traveller needs and accommodation. The below provides a high-level summary of the relevant policies and the assessment of need.

National Policy

2.2 It is essential that the site selection process is undertaken having full regard to, and be consistent with, current Government policy on Traveller sites. The Government's Gypsy and Traveller Planning Policy for Traveller Sites (PPTS) sets out current government planning policy and should be read in conjunction with the NPPF. The Council's Gypsy and Traveller Site Selection Methodology (G&T SSM) has been developed in response to the requirements set out in the Government's NPPF and the PPTS.

2.3 As set out in the government's Gypsy and Traveller Planning Policy for Traveller Sites (PPTS) (2015)² the overarching aim of the Government *is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community (G&T PPG Paragraph 3)*. The methodology proposed seeks to achieve these two objectives in line with the identified need set out in the Council's Gypsy and Traveller Accommodation Needs Assessment (October 2020)³.

London Plan Policy

2.4 In addition to the national planning context, the London Plan sets out under *Policy H14* that boroughs should plan to meet their identified need for permanent Gypsy and Traveller pitches and must include ten-year pitch targets. Councils should undertake a needs assessment as a part of the review of Local Plans in a borough's area and plan to address issues and needs identified in the audits.

Enfield's Adopted Core Strategy

2.5 The boroughs adopted Core Strategy sets out in Core Policy 6 (Meeting housing needs) that the Council will work to ensure that there is appropriate provision of specialist accommodation across all tenures), with specific reference to the criteria for assessing the locations of applications for Gypsy and Traveller sites:

- There is vehicular access from the public highway and provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;
- There is no harm to visual amenity and there is adequate landscaping and planting, with appropriate trees and shrubs;
- The site has good access to shops, health care, school and other education facilities;
- The site is not in an area at high risk of flooding, including functional floodplains; and

² [Gypsy and Traveller Planning Policy Guidance \(2015\) PPG](#)

³ [Enfield Gypsy and Traveller Accommodation Needs Assessment \(2020\)](#)

- The size of the site is appropriate to its local context, and in relation to the local infrastructure and population size and density.

Draft Enfield Local Plan

2.6 The Draft Local Plan Policy DM H10: Gypsy and Traveller accommodation sets out several criteria that proposals for Gypsy and Traveller pitches must demonstrate. Consideration to these requirements has been given and will for a part of the approach of the G&T Site Selection Methodology. The requirements are:

- the site is in an area suitable for residential occupation and suitably connected by sustainable modes of transport with health care, retail and school facilities with capacity;
- the impact of the development would not harm the landscape, heritage assets, biodiversity or visual character and amenity of the area, particularly the green belt;
- the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;
- the site can be safely accessed by pedestrians, vehicles and caravans;
- be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities; and
- adequate on-site utilities, including water resources and supply, waste disposal and treatment, are provided for the benefit of residents and in order to avoid adverse impacts on the natural environment.

Enfield's Evidence of Need

- 2.7 The Council published its Gypsy and Traveller Needs Assessment (GTANA) (2020) as a part of the Enfield Local Plan evidence base, which set out the quantity and type of Traveller accommodation needed within the borough over its plan period.
- 2.8 The Enfield GTANA identified a PPTS (Planning Policy for Traveller Sites) need for 21 permanent pitches to be delivered over the plan period. The document identified a cultural need for 23 permanent pitches, with an additional 6 transit (stopover) pitches to be delivered over the plan period up to 2039. As set out in the Enfield GTANA, the cultural need accords with the overall need for the Travelling community and takes account of the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. The GTANA notes in paragraph that the Council should be aware of its obligations to the referenced legislation and consider the 'cultural' need identified.
- 2.9 The proposed G&T SSM will seek to identify sites to deliver the identified need of 23 pitches in the borough which meets the obligations of the PPTS need and will also be in accordance with the relevant legislation set out in the GTANA (2020) and referenced in paragraph 2.8 of the G&T SSM. It should be noted that the preferred option set out in Draft Local Plan is to identify 21 pitches over the plan period.

3. Gypsy and Traveller Site Selection Methodology Overview

2.10 The Housing and Economic Land Availability Assessment (HELAA) provides the starting point for the assessment of land suitable for Gypsy and Traveller pitch provision helping to identify sites. Sites will then be assessed through the Gypsy and Traveller Site Selection Methodology (G&T SSM) against several different, more exhaustive, criteria to assess their potential for allocation specifically for the identification of suitable Gypsy and Traveller sites.

2.11 The criteria proposed to be used for the G&T SSM addresses the London Plan, assessing sites against multiple criteria to ensure that identified sites are “*well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood*” (London Plan Para 4.14.1).

2.12 A comprehensive list of G&T SSM for every stage of the site selection process can be viewed in Appendix 1 of this document and includes the criteria used as a part of the main Site Selection Methodology process.

Table 01: Combined Site Selection Methodology and Gypsy and Traveller Site Selection Overview		
Stage	Stage overview	Criteria source
Stage 1: Identification and initial sift of sites	Stage 1a: Identification of sites	Main SSM criteria
	Stage 1b: Assessment of absolute constraints	Main SSM criteria
	Stage 1c: Size threshold to meet minimum number of pitches (Gypsy & Traveller constraint criteria): <ul style="list-style-type: none"> Minimum for 5 pitches (0.5ha) & associated facilities permanent sites Minimum for 5 pitches (0.1 ha) & associated facilities temporary sites 	Gypsy & Traveller SSM criteria
	Stage 1d: Planning status <ul style="list-style-type: none"> All sites with planning permissions for housing will be sifted out at this stage 	Gypsy & Traveller SSM criteria
Stage 2: Promoting a sustainable pattern of development	Stage 2a: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> Prioritises land in the urban area, then Prioritises brownfield land in the Green Belt, then Prioritises lower performing land in the Green Belt 	Main SSM criteria
Stage 3: Detailed planning assessment	Stage 3a: Consideration of technical constraints (e.g highways)	Main SSM criteria
	Stage 3b: Consideration of other non-absolute constraints (e.g historical/ecological etc) using; <ul style="list-style-type: none"> Existing Site Selection Methodology; and Proposed Gypsy and Traveller site selection methodology 	Main SSM criteria; and Gypsy & Traveller SSM criteria (table 4, overleaf)

Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)	Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation	Main SSM criteria; and Gypsy & Traveller SSM criteria
Stage 5: Deliverability	Stage 5: Does the evidence indicate that the site could be delivered within the plan period?	Main SSM criteria; and Gypsy & Traveller SSM criteria
Stage 6: Overall Conclusion	Stage 6: Indication of preferred site allocations	Main SSM criteria; and Gypsy & Traveller SSM criteria

Stage 1: Site Identification and Initial sift of sites

Stage 1a - Identification of Sites

2.13 The G&T SSM will utilise the HELAA and any future Call for Sites to identify land for the future supply of Gypsy and Traveller sites in the borough. The proposed G&T SSM criteria will be used to undertake an initial sift of these sites for deliverability. The main Site Selection Methodology lists the sources where sites have been identified from and included in the HELAA (see paragraph 3.2 of the main SSM).

Stage 1b – Assessment of Absolute constraints

2.14 This stage forms part of the HELAA, assessing sites against absolute constraints as set out in the main Site Selection Methodology. These constraints will help identify if the land is suitable for delivering housing, which includes the suitability for providing sites for Gypsies and Travellers. Sites wholly covered by absolute constraints will be discounted from further stages of the main SSM.

Stage 1c – Size Threshold and Planning History

2.15 A significant number of developable and potentially developable sites have been identified within the HELAA. The G&T SSM proposes thresholds for the initial sifting of all developable and potentially developable sites specifically for Gypsy and Traveller sites. Not all the sites identified at Stage 1 will be appropriate for allocation.

2.16 The PPTS does not provide any guidance on the appropriate minimum size for a Traveller site. The DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)⁴, which has been withdrawn, also does not provide specific guidance on minimum site size thresholds. The guidance does contain information relating to site design requirements and indicates that 0.2 hectares can be used as a minimum size threshold which would accommodate approximately 4 pitches. These thresholds include capacity for the delivery of private pitches and the associated shared facilities.

⁴ [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

- Gypsy and Traveller sites (0.2 ha) or 4 pitches minimum

2.17 The thresholds proposed using the guidance should enable the identification of transit and permanent pitches that can support the specific accommodation needs and supporting facilities required:

For transit pitches, each individual pitch needs to contain the following:

- Space for two touring caravans
- Two parking spaces
- Water and electricity connections
- A 3m buffer around the boundary

For permanent pitches, each pitch would generally contain the following:

- Space for a mobile home
- Space for a touring caravan
- An amenity block (containing WC with sink, bath/shower, store room, kitchen/food preparation area, small dining area)
- Two parking spaces
- At least six metres between mobile homes; and
- A 3 metre buffer around the boundary.

2.18 The Enfield GTANA notes that it is generally accepted amongst the travelling community that sites of 6 to 10 pitches are appropriate. It caveats this with local circumstances such as families wanting to have sites for their own use should be considered when planning new provision. Some respondents to the household survey specifically requested sites for specific family groups within the 6 – 10 pitch range.

2.19 As noted in paragraph 3.10 of the Enfield GTANA, sites of 6 to 10 pitches are generally accepted as appropriate within the Gypsy and Traveller community with the DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008) setting out 0.2 hectares can provide approximately 4 pitches (with capacity for 8 caravans and associated facilities). These parameters will be used to guide the selection of sites to deliver the identified 'cultural' needs of 23 permanent pitches in the borough. Therefore sites will be considered where a minimum of 6 pitches are estimated to be deliverable or 0.3 hectares.

2.20 At this stage the G&T SSM proposes to include the planning status of land in order to carry out the first sift sites. The proposed criteria will exclude sites that have live planning permissions for housing, except in instances where permissions lapsed or that are for Gypsy & Traveller accommodation as this could meet the identified need for Gypsies and Traveller accommodation in the borough.

Table 02: Stage 1 G&T SSM criteria			
Assessment criteria	Assessment criteria grading		Assessment Criteria purpose
Planning status	All sites with planning permissions for housing will be excluded at this stage (except sites that include provision of G&T accommodation)		Proposed Gypsy & Traveller SSM
Minimum site threshold (approximately 6 pitches)	0.3 ha or greater (included)	Less than 0.3 ha (excluded)	Proposed Gypsy & Traveller SSM

Stage 2: Promoting Sustainable Pattern of development

- 2.21 As set out in the main Site Selection Methodology, site options identified at Stage 1 will be taken forward to Stage 2 of the main Site Selection methodology where they also meet the proposed threshold for site size for Gypsy and Traveller sites.
- 2.22 At Stage 2 sites will be sifted using the main SSM criteria (see appendix 1) and the supplementary proposed G&T SSM criteria (see table 03 overleaf).

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

- 2.23 The main SSM document sets out how remaining site options will be assessed and prioritised at Stage 2 (see table 03) where the allocation of land will be prioritised in the urban area, with an emphasis on brownfield sites, in addition to ensuring sites conform with the emerging spatial strategy for the pattern and scale of development in the borough.
- 2.24 As referenced in the main SSM the NPPF aims to promote patterns of development which make the fullest possible use of public transport, walking and cycling and which can minimise the need to travel.

Table 03. Main Site Selection Methodology site prioritisation criteria⁵			
Priority	Broad Site location	Site typology	Approach to Allocation
1	Sites within the urban area	Brownfield sites in urban areas	Allocation, subject to other stages
2		Greenfield sites in urban areas	Allocation, subject to other stages
3	Accessible Green Belt sites	Brownfield sites in accessible ⁶ Green Belt locations	Potential allocation possible subject to alignment with emerging spatial strategy
4		Greenfield sites in accessible, lower performing Green Belt location	Potential allocation possible subject to alignment with emerging spatial strategy
5		Greenfield in accessible, moderately performing Green Belt location	Potential allocation less likely, unless exceptional circumstances

⁵ Site Selection Methodology: Table 2: Prioritisation of sites by category

⁶ Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites

6		Greenfield in accessible, high performing Green Belt location	Potential allocation less likely, unless exceptional circumstances
7	Isolated Green Belt Sites	Brownfield in isolated Green Belt location	No allocation unless exceptional circumstances
8		Greenfield in isolated low or moderately performing Green Belt location	No allocation unless exceptional circumstances

Stage 3: Detailed Planning Assessment

2.25 The main Site Selection Methodology will be applied to all sites included at Stage 3(appendix 2) with the proposed supplementary criteria of the Gypsy and Traveller Site Selection Methodology which will specifically assess land for its potential suitability as a Gypsy and Traveller site.

Stage 3a – Consideration of Technical Constraints

2.26 As set out in the main SSM this stage involves the consideration/assessment of physical and environmental constraints in accordance with Planning Practice Guidance on Land Availability Assessments. Sites will be assessed using the main SSM.

2.27 Each site will therefore be subject to advice from relevant specialist officers, as well as those at the GLA and from statutory infrastructure providers where necessary, relating to matters such as highways, environmental health and the environment. This will include a strategic assessment of whether any constraints identified could be mitigated.

2.28 At this stage where significant environmental and/or physical constraints are identified, sites will not be taken forward for further consideration.

Stage 3b – Consideration of other non-absolute constraints

2.29 The main SSM sets out that the assessment of sites comprises the consideration of several key criteria including Green Belt (as part of Stage 2) flood risk, and highways. In addition, the potential impact on landscape, historic assets ecological designations, utilities, education, health facilities also need to be considered.

2.30 The proposed G&T SSM assessment criteria will include supplementary non-absolute constraints to Stage 3b (see table 04). Sites will be assessed against how they perform against the various criteria and whether constraints can be overcome for each site. Using the main SSM and the proposed supplementary G&T SSM criteria a qualitative approach when analysing sites will be taken. All sites not excluded will automatically be taken forward to the next stage of the site selection process.

2.31 This approach ensures the site assessment follows a consistent approach with the existing site selection methodologies while further sifting sites that could meet the specific needs of the Gypsy and Traveller community. Proposed criteria will include assessing Gypsy and Traveller sites for:

- The environment for occupiers, including but not exclusive of, noise, odour, adjacent uses to the site i.e industrial uses.
- Site access for vehicles (i.e. caravans) specific to the Gypsy and Traveller community need to the highway.
- Site access for pedestrians to the highway.
- The existing users near the sites and to avoid unacceptable impact to the surrounding community, both residential and business users.
- Access to local facilities and services, including health, education and shopping facilities.

2.32 The proposed G&T SSM criteria (table 04) recognises the benefits of a cleared site and the issues of conversion or demolition of buildings on site, which may impact on the viability and deliverability of Gypsy and Traveller sites.

2.33 At this Stage, sites that require the demolition of a building to clear the site will be excluded and not taken forward to Stage 4.

Table 04: Stage 3b G&T SSM: Detailed site assessment			
Assessment criteria	Assessment criteria grading		Assessment Criteria purpose
Does the site contain existing development?	Building on site that need to be demolished		Proposed Gypsy & Traveller SSM
	Building on site that can possibly be converted for Gypsy and Traveller use		
	None on site		
Access to road network (good vehicle /pedestrian access from highway)	Y (included)	N (are mitigation measures possible)	Proposed Gypsy & Traveller SSM
Site access (see DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)⁷)	Y (included)	N (are mitigation measures possible)	Proposed Gypsy & Traveller SSM
Access to services- including health, schools, shops and public transport	Y (included)	N (are mitigation measures possible)	Proposed Gypsy & Traveller SSM
Access to Utilities (e.g mains water, electricity, sanitation on site or able to be provided)	All available		Proposed Gypsy & Traveller SSM
	Some available		
	None		
Acoustic Privacy	No noise issue or existing acoustic barriers		Proposed Gypsy & Traveller SSM
	Noise issue near site which may require mitigation		
	Major noise issue on or close to site requiring mitigation before site can be used		

⁷ [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

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

- 2.34 As set out in Stage 4 of the main Site Selection Methodology, the Sustainability Appraisal (SA) systematic process that must be carried out during the preparation of the Local Plan and is a key part of the evidence base of the Local Plan. The SA is integrated in the Integrated Impact Assessment (IIA) which will also include the following assessments:
- Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)
 - Habitat Regulations Assessment (HRA)
 - Equalities Impact Assessment (EqIA)
 - Health Impact Assessment (HIA)
 - Community Safety Impact Assessment (CSIA)
- 2.35 The Environmental Assessment of Plans and Programme ('SEA') Regulations 2004 sets out the procedural requirements that the IIA must be undertaken in accordance with.
- 2.36 The role of the IIA is to promote sustainable development through better integration of sustainability considerations into Plan preparation and adoption. The IIA is an integral part of good plan-making and should not be a separate activity. It is an iterative process that identifies and reports on the likely significant effects of a plan or strategy and the extent to which implementation of the plan or strategy will contribute toward sustainable development.
- 2.37 As set out in the main SSM, the IIA informs decision-makers about the environmental and sustainability consequences of the proposed Local Plan policies which can then be considered alongside financial, technical, political and other concerns.
- 2.38 In line with the stages of the main SSM, sites that are carried forward from the initial sift of sites will be subject to an Integrated Impact Assessment (IIA). This is to ensure that sites which are deemed 'reasonable alternatives' are considered against the IIA objectives to determine their sustainability.
- 2.39 Sites will be considered against the objectives included in the Regulation 18 IIA (2021). The objectives as part of this have been adapted from the [Sustainability Appraisal Scoping Report \(May 2020\)](#). The IIA objectives are set out in appendix 3, which identified Gypsy and Traveller sites and reasonable alternatives will be assessed.
- 2.40 The Sustainability Appraisal seeks to identify likely significant effect of development at each of the sites. In addition, and where possible it will also seek to identify ways in which the harmful effects of development may potentially be avoided or mitigated. Where appropriate potential adverse effect and suitable types of mitigation measures will be given consideration.
- 2.41 As set out in the main SSM, sites that are taken forward for potential allocation will be fully informed by the overall outcomes of the IIA testing as a qualitative assessment in addition to other evidence that emerges through or outside of the site assessment process. As with the approach taken in the main Site Selection Methodology a summary of the IIA Appraisal for each site will be included in the site assessment sheet to ensure the selection of the

most appropriate sites for inclusion in the emerging Local Plan.

Habitats Regulation Assessment (HRA)

2.42 The main SSM sets out the need for the HRA, which is set out within Article 6 of the EC Habitats Directive 1992 and interpreted into British law by the Conservation of Habitats & Species

Regulations 2017. The aim of the Habitats Directive is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

2.43 The HRA is a separate process focused on avoiding impacts to internationally designated biodiversity sites, and there is no formal requirement to ‘scope’; however, an early discussion of HRA scope is considered appropriate. In short, the discussion within the [HRA of the Reg-18 Local Plan](#) provides a focus on and the adverse effects of growth on the integrity of the Epping Forest Special Area of Conservation (SAC), the impacts on Lee Valley SPA/Ramsar site and Wormley Hoddesdon Park Woods SAC. HRA is an iterative process and is expected to be updated in light of newly available evidence and comments from key consultees.

Stage 5: Deliverability

2.44 This stage considers whether sites are or are not deliverable and the timescales and phasing of delivery. The starting point will be the assessment of achievability contained within the HELAA with supplementary criteria specifically applied to assess suitability for the allocation as a Gypsy and Traveller site.

- Land ownership (e.g. private site put forward for Gypsy and Traveller use)
- Site infrastructure and delivery issues (e.g mitigation measures required to meet specific site requirements such as utilities)
- Barriers to delivery (e.g the site has been identified as a suitable site allocation for housing, employment, retail, infrastructure and other mixed use)
- Delivery approaches
- Site capacity taking into account constraints and other relevant factors (e.g that sites are likely to be delivered within the timeframes of the GTANA 2020 or within the Plan Period)

2.45 At this stage considerations will be given to the deliverability of the site with a high-level assessment of whether development is viable and to give an indication of whether there is a reasonable prospect of a site being delivered and when, a key requirement of national planning policy

Stage 6: Overall Conclusion

2.46 The final stage of the process is to draw conclusions and to make recommendations about the suitability of each site for inclusion as a proposed allocation in the New Local Plan. These will be based on professional judgement and take account of:

- Suitability;
- Whether the land is previously developed land, and/or in the urban area;
- Accordance with the emerging spatial strategy;
- Sustainability Appraisal;
- Emerging Draft Local Plan Policy requirements;
- Deliverability of Sites; and
- Any other relevant factors.

2.47 A site selection summary table will be prepared. The conclusions will set out whether a site is recommended for inclusion as a site allocation in the New Local Plan. It will also set out the main reasons to explain why a site is included or not.

4. Appendices

Appendix 1: Full list of Site Assessment Criteria

- 5.1 Set out in table 06 are the proposed criteria to identify sites specifically for Gypsy and Traveller accommodation. The table below includes the main Site Selection Methodology that will be applied at each stage of the site selection process supplemented by the proposed G&T SSM criteria. The main SSM identifies land suitable for all housing and the proposed G&T SSM sets out additional criteria to include or exclude sites suitable for housing that also to meet the specific needs of the Gypsy and Traveller community.
- 5.2 Some assessment criteria will be assessed using a RAG (Reg/Amber/Green) approach (table 05). This will identify site that have no known constraints, those with identified constraints that can potentially be mitigated and those with significant constraints that are likely to rule a site out. This approach should facilitate bringing forward the most appropriate sites to meet the needs of the Gypsy and Traveller community.

Table 05: Proposed appraisal criteria	
Assessment	Definition
	No constraints identified, development acceptable in principle.
	Constraints identified, mitigation should be possible within the plan period.
	Significant constraints identified, mitigation unlikely and it is probable development is unacceptable within the plan period.

Table 06: Criteria by stage for Gypsy and Traveller site allocation assessment		
Assessment criteria	Assessment criteria grading	Assessment Criteria purpose
Stage 1a: Identification of sites		
Identification of sites (e.g. Site address, Site area (ha), Current land use)	N/A for consultation	SSM criteria
Stage 1b: Assessment of absolute constraints		
Assessment of absolute constraints (e.g. Potential physical constraints, environmental constraints, access/highways, Access to local services, Overall availability conclusion)	N/A for consultation	SSM criteria
Stage 1c: Size threshold to meet minimum number of pitches		

Minimum site threshold (approximately 6 pitches)	0.3 ha or greater (included)	Less than 0.3 ha (excluded)	Proposed Gypsy & Traveller SSM
Stage 1d: Planning status			
Planning history	Planning application currently associated with site		Proposed Gypsy & Traveller SSM
	For a different use in last 5 years that could impact on value and deliverability		
	None		
Stage 2a: Site assessment: Suitability assessment			
Sites within the urban area	N/A for consultation		SSM criteria (see table 03)
Accessible Green Belt sites			
Isolated Green Belt Sites			
Stage 2b site assessment: Suitability assessment			
Does the site contain existing development?	Building on site that need to be demolished		Proposed Gypsy & Traveller SSM
	Building on site that can possibly be converted for the Gypsy and Traveller use		
	None on site		
Stage 3a: Detailed site assessment - Consideration of Technical Constraints			
Consideration of Technical Constraints	N/A for consultation		SSM (see appendix 2)
Stage 3b: Detailed site assessment - Consideration of other non-absolute constraints			
Consideration of other non-absolute constraints	N/A for consultation		SSM (see appendix 2)
Access to road network (good vehicle /pedestrian access from highway)	Y (included)	N (are mitigation measures possible?)	Proposed Gypsy & Traveller SSM
Site access (see DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)⁸)	Y (included)	N (are mitigation measures possible?)	Proposed Gypsy & Traveller SSM
Access to services- including health, schools, shops and	Y (included)	N (are mitigation measures possible?)	Proposed Gypsy & Traveller SSM

public transport			
Access to Utilities (e.g mains water, electricity, sanitation on site or able to be provided)	All available	Proposed Gypsy & Traveller SSM	
	Some available		
	None		
Acoustic Privacy	Major noise issue on or close to site requiring mitigation before site can be used	Proposed Gypsy & Traveller SSM	
	Noise issue near site which may require mitigation,		
	No noise issue or existing acoustic barriers		

⁸ [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

Appendix 2: Main Site Selection Methodology Detailed Assessment considerations

Question	Assessment outcome		
Is the site within a landscape character area?	Y could have significant impacts on landscape quality	Y but not considered to be harmful	N
Is the site within a valuable townscape character area?	Y the site could have significant impacts on townscape and cannot be mitigated to an acceptable level	Y the site is would impact the townscape but could be mitigated to an acceptable level	N The site has limited townscape character
Does the site have open space / recreation value, or is it located within an area of deficiency?	Y the site is of important recreational value / would result in the total loss of an area of open space with no replacement in an area of deficiency	Y The site is of moderate recreational value / would result in the loss of open space, but some space could be retained or re-provided / would not lead to loss of open space, but no potential to provide additional space in an area of deficiency	N
Are there Tree Preservation orders / veteran trees / protected vegetation on site (e.g. hedgerows / areas of woodland on the site)?	Y would require significant loss or harm	Y, but can be developed without significant loss or harm	N
Are there designated heritage assets on site?	Y would result in significant harm that cannot be mitigated	Y, adjacent to site and would result in less than substantial harm that could be mitigated	N
Are there undesignated heritage assets on site?	Y would result in significant harm that cannot be mitigated	Y, adjacent to site and would result in less than substantial harm that could be mitigated	N
Agricultural land classification	Grade 1 or 2	Grade 3a	Grade 3b
Would proposed use compromise the integrity or effectiveness of Strategic Industrial Land?	Y Would compromise the integrity or effectiveness of the site (or adjacent SIL) in accommodating industrial-type activities and its ability to operate on a 24-hour basis.	-	N

Does the site lie in an area (hot spot) of poor air quality?	<p style="text-align: center;">Y</p> <p>the site lies in an area of poor air quality where development would be unacceptable.</p>	<p style="text-align: center;">Y</p> <p>the site lies in an area of poor air quality, but mitigation could make it acceptable for development</p>	<p style="text-align: center;">N</p>
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⁹ Site Selection Methodology: Table 3: Detailed Assessment considerations

Appendix 3: Integrated Impact Assessment Objectives

Table 08: Integrated Impact Assessment objectives	
Topic	TLP Integrated Impact Assessment Objective(s)⁷
Air quality	Minimise air pollution. (LBE IIA: Objective 11)
Biodiversity	Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks. (LBE IIA: Objective 13)
Brownfield first	To achieve efficient use of land and materials. (LBE IIA: Objective 16)
Climate change adaptation	Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought. (LBE IIA: Objective 2)
Climate change mitigation	Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the council will become a carbon neutral organisation by 2030 and a carbon neutral borough by 2040. (Enfield Local Plan: IIA Objective 1)
Communities	Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time. (LBE IIA: Objective 5) Encourage social inclusion, promotion of equality and a respect through diversity. (LBE IIA: Objective 6)
Crime and community safety	Reduce crime and increase community safety. (LBE IIA: Objective 7) Focus on delivering the 'Vision Zero' target for road safety. (LBE IIA: Objective 8)
Economy and employment	Support a strong, diverse and resilient economy that provides opportunities for all. (LBE IIA: Objective 9)
Flood risk	Manage and reduce the risk of flooding. (LBE IIA: Objective 17)
Health	Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the borough. (LBE IIA: Objective 4)
Heritage	Sustain and enhance the significance of heritage assets. (LBE IIA: Objective 14)
Housing	Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people. (LBE IIA: Objective 3)
Landscape and townscape	Protect and enhance the character, quality and diversity of the borough's landscape and townscapes. (LBE IIA: Objective 15)
Mental health and wellbeing	Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities in the borough. (LBE IIA: Objective 4)

⁷see

Town centres	Support the vitality of the borough's town and local centres. (LBE IIA: Objective 10)
Transport	Minimise the need to travel and support modal shift away from the private car. (LBE IIA: Objective 12)
Water	Minimise water use and protect water quality. (LBE IIA: Objective 18)

Density	A measure illustrating the potential number of dwellings that can be accommodated within a defined area. (Usually measured as the number of dwellings per hectare). See also Gross Density and Net Density.
Developable	A site should be in a suitable location for housing development, and there should be a reasonable prospect that it will be available for and could be viably developed at a specific point in time.
Equalities Impact Assessment (EqIA)	The equality impact assessment is a systematic and evidence-based tool, which enables us to consider the likely impact of work on different groups of people. Equality impact assessments ensure that policies, services and legislation do not discriminate against anyone and that, where possible, we promote equality of opportunity.
GLA	Greater London Authority
Gypsies and Travellers	Defined by DCLG Planning policy for Traveller sites (August 2015) as “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, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”. The planning policy goes on to state that, “In determining whether persons are “Gypsies and Travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”.
Gypsy and Traveller Needs Assessment (GTANA) (2020)	An independent assessment that establishes the evidence of need for permanent residential pitches and transit provision in an area. It should provide a clear, robust and credible evidence base to inform the development of policies relating to Gypsy and Travellers and Travelling Showpeople. The Council is required to provide a five-year land supply for Gypsy and Traveller sites within its local plan in the same way as for other types of housing.
Habitat Regulations Assessment (HRA)	A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
Health Impact Assessment (HIA)	An Impact Assessment to ensure that there is a focus on achieving better health and wellbeing of communities, as an outcome of their policy initiatives and plans.
Housing and Economic Land Availability Assessment (HELAA)	An appraisal of the amount of land available for housing and economic use and is required in order to assess the capacity of suitable land.

Integrated Impact Assessment (IIA)	An assessment that incorporates the statutory responsibilities to undertake for Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA). It also includes a Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).
Local Plan	The Local Plan contains a series of local development documents (LDDs) that set out how the borough will change and develop in the future and how its places and environs will be protected and enhanced, these are drawn up by the Local Planning Authority.

Appendix 4: Glossary

Glossary	
Achievability	A site which is regarded achievable for development where there is a practical view that housing can be developed on the site at a certain point in time. This is fundamentally a judgement about the economic viability of the site, and the capacity of the developer to complete and sell the housing over a certain period.
Allocation	The council's development plan identifies area of land for development. The allocation will also indicate the Council's preferred use for the land.
Availability	A site which is seen as available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.
Call for Sites	Exercise undertaken by the Council inviting interested parties to submit sites for consideration in the Housing and Economic Land Availability Assessment.
Caravans	Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.
Community Safety Impact Assessment (CSIA)	Assessment to ensure that the Local Plan vision, objectives, policies and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.
DCLG (DLUHC)	Department for Communities and Local Government; created in May 2006. Now the Department for Levelling Up, Housing and Communities (DLUHC) Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).
Deliverability	A site is considered to be deliverable if it is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within 5 years from the date of adoption of the plan.

London Plan	The London Plan is the name given to the Mayor's spatial development strategy for the capital in the United and published by the Greater London Authority.
National Planning Policy Framework (NPPF)	This sets out the Governments requirements on planning policy for England and how it expects them to be applied.
Non-absolute constraints	Non-absolute constraints are those that are sensitive but have less weight applied to them in national policy.
Permanent sites	Pitches providing residents with a permanent home.

Pitch	Area of land on a Gypsy/Traveller site occupied by one resident family and their caravans (static and travelling) and parking spaces together with enough room for the turning of vehicles. Sometimes referred to as a plot, especially when referring to Travelling Showpeople. DCLG Planning policy for Traveller sites (August 2015) 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”.
PPTS	Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions).
Site	An area of land laid being proposed for Gypsy/Traveller accommodation in the context of this document (Draft Gypsy and Traveller Site Selection Methodology).
Site Selection Methodology (February 2021)	The Site Selection Methodology (SSM) is intended to objectively screen and then assess sites taking into account a wide range of factors to guide choices over site allocations in the Local Plan.
Suitability	A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. For sites not allocated for housing in development plans or having the benefit of planning permission for housing, policy restrictions, physical problems or limitations, potential impacts and environmental conditions should be considered.
Sustainability Appraisal	An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)	A structured approach to determine the environmental and socio-economic effects development could have.

Technical Constraints	Physical and environmental constraints.
The Gypsy and Traveller Site Selection Methodology	The Site Selection Methodology (SSM) is intended to objectively screen and then assess sites taking into account a wide range of factors to guide choices over site allocations in the Local Plan specifically to meet the identified need for Gypsies and Travellers in an area.
Transit sites	A site that is authorised for short-term stays by Gypsies and Travellers. The site is usually permanent but are used short term and have basic amenities and services. There is a limit on the length of time residents can stay. They are only meant to be for short-term stop-overs.
Unauthorised encampment	Land that is owned by Gypsies and Travellers but does not have planning permission for use as a residential or transit site. If an unauthorised encampment is on Council land, the Council has a power, not a duty, to move them on and they may only evict them subject to complying with Human Rights legislation and other procedures. Failure to comply would render the Council and Police officers liable to a challenge in the courts, proving potentially costly and quite probably resulting in lengthy stays for the Travellers. The Council cannot remove Gypsies and Travellers immediately from land on which they are illegally encamped. This Council has taken legal action to remove Gypsies and Travellers from such sites.
Utilities	Includes water, electricity, sewerage, drainage and refuse disposal on a site.

Appendix 02: List of Assessed Sites

The table below sets out the full list of sites assessed to identify suitable locations for Gypsy and Traveller provision within the London Borough or Enfield.

Table 08: List of assessed sites

Site Reference	Site name / address	Approximate estimated pitch capacity ⁸	Site source
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	10	Submitted through CFS 2022
TLP_02	Durant's Park Bowling Green (EN3 5JE)	9	Submitted via LBE property
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	22	Submitted via LBE property
TLP_04	Hillyfields Depot & Land (large site) (EN2 OHN)	4	Submitted via LBE property
TLP_05	Comreddy Close (EN2 8RN)	5	Submitted via LBE property
TLP_06	Dove Lane, Potters Bar (EN6 2SH)	18	Submitted via LBE property
TLP_07	Land Sterling Way / Weighbridge (N18 1BH)	11	Submitted via LBE property
TLP_08	Land south of Dendridge Close (EN1 4PN)	6	Submitted via LBE property
TLP_09	Land at A10 (N21 2PS)	6 (Transit only)	Submitted via LBE property
TLP_10	Chase Park	10+	ELP Place Making area (Policy 10)
TLP_11	Crews Hill	10+	ELP Place Making area (Policy 11)

⁸ Approximate estimate is based upon the Gypsy and Traveler 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.

Appendix 03: List of excluded sites following Site Selection Assessment

The table below sets out the list of assessed sites excluded from allocation to provide Gypsy and Traveller provision. The table sets out the reason sites have been excluded from selection.

Table 09: Full list of excluded sites

Site Reference	Site name / address	Approximate estimated pitch capacity ⁹	Reason site has been assessed as unsuitable for allocation
TLP_02	Durant's Park Bowling Green (EN3 5JE)	9	Legal issues have been identified on the site and the site cannot be considered available.
TLP_04	Hillyfields Depot & Land (large site) (EN2 0HN)	4	Site below the 0.3ha site size threshold for selection
TLP_05	Comreddy Close (EN2 8RN)	5	Site below the 0.3ha site size threshold for selection
TLP_06	Dove Lane, Potters Bar (EN6 2SH)	18	Site located outside of the Enfield borough boundary and would need to be promoted and allocated through Hertsmere County Council.
TLP_07	Land Sterling Way / Weighbridge (N18 1BH)	11	The site is within a Borough SINC, a watercourse divides the site, its partially within Flood Zone 3a and 3b, its within a Wildlife corridor, there are TPOs along the watercourse, there is no access road and the site is constrained by site dimensions. The site is also part of Wilbury Way wetlands initiative. The site is unsuitable for permanent or transit provision.
TLP_08	Land south of Dendridge Close (EN1 4PN)	6	100% located within Greenbelt, and Grade 3 agricultural land. Soil surveys required to establish whether in Grade 3a. The site is partially covered by FZ 3a,3b and 2. Approx 95% within borough SINC. Adjacent to substation/gas tanks and access track runs through site, heavily constrained due to site dimensions and topography The site is unsuitable for permanent or transit provision.

⁹ Approximate estimate is based upon the Gypsy and Traveler 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.