

**Enfield Draft Local Plan Consultation response
London Gypsies and Travellers
13 September 2021**

We write in relation to Draft Policy DM H10: Gypsy and Traveller accommodation in the New Enfield Local Plan. We very much welcome that fact that the evidence base acknowledges the accommodation needs of Gypsy and Traveller families in the Borough and we would support a Local Plan policy that seeks to provide culturally suitable accommodation for the community.

We have a number of comments at this stage:

- **The Local Plan policy should include the full extent of need**

As it stands, the supporting text of Policy DM H10 makes reference only to the need for 21 pitches arising from families who meet the Planning Policy for Traveller Sites definition of Travellers.

However, in order to be consistent with both NPPF and PPTS and meet the requirements of Section 124 of the Housing and Planning Act, Local Plans need to include evidence of need of both Travellers who meet the PPTS definition, and those who do not. This was tested recently in the Examination in Public of the New Southwark Plan, and Planning Inspectors recommended that the Local Plan policy on Gypsy and Traveller accommodation should explicitly acknowledge non-PPTS need¹. Therefore the policy should set a target to meet the overall permanent need of 23 pitches.

Secondly, in line with PPTS, Local Plans need to also acknowledge transit accommodation needs. The 2020 Enfield GTANA recommends provision of a transit/stop over site for 6 pitches. This should be reflected in the Local Plan policy.

- **The preferred option should be to meet the accommodation needs of Gypsies and Travellers as part of the Local Plan**

We do not support the approach of a separate Gypsy and Traveller Local Plan, as this will put Gypsy and Traveller communities at further disadvantage in terms of accessing housing that is culturally appropriate and meets their needs, and therefore going against the Council's Equality Duties.

¹ See Inspectors' post hearings advice letter May 2021
<https://www.southwark.gov.uk/assets/attach/43457/EIP236-Southwark-s-Post-Hearings-Letter-28-May-2021.pdf>

The 'pros and cons' table setting out different options for this policy is misleading. Under the option to 'meet Enfield's objectively assessed needs as part of the Local Plan' it says that there are no sites in the Borough, presumably meaning there is no land available for Gypsy and Traveller in the Borough. However there is no evidence of a site appraisal process to show this. There is no guarantee that deliverable sites will become available if the option 'Meet the needs of the Gypsy and Traveller accommodation through the proposed Gypsy and Traveller Local Plan' is pursued at a later stage.

All sites that are being assessed through the Local Plan process should be considered and evaluated for their potential to meet the need for Gypsy and Traveller homes. A range of options should be considered to accommodate the 23 permanent pitches, possibly across multiple small sites, and the stop over site of 6 pitches. The options for possible locations need to go through thorough consultation with Gypsy and Traveller families.