



Enfield Traveller Local Plan

Site Selection Topic Paper

September 2025

Other relevant documents

This Topic Paper is intended to help explain the Traveller Local Plan (TLP) Site Selection process. It should be read in conjunction with the wider submission document package which support the TLP, including the Duty to Co-operate Compliance Statement (August 2025) and the TLP Exceptional Circumstances Topic Paper (September 2025).

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1. Introduction

Purpose of this document

- 1.1 This Topic Paper forms part of the evidence base for the emerging Traveller Local Plan (TLP), which covers the period 2020–2041. It sets out the site selection process and the justification for the proposed allocations, demonstrating that the Council’s approach to meeting the accommodation needs of Gypsies and Travellers is sound, robust, and evidence based.
- 1.2 This Topic Paper should be read alongside the Duty to Cooperate Compliance Statement (August 2025) and the TLP Exceptional Circumstances Topic Paper (September 2025), the latter of which provides the justification for the proposed release of two sites from the Green Belt, and one site from Metropolitan Open Land (MOL).
- 1.3 It also explains the rationale behind the selection of sites, supporting the implementation of Policy TLP1 within the Regulation 19 Submission Draft TLP, and sets out why certain alternative sites or placemaking areas have not been selected or considered as reasonable alternatives.
- 1.4 These conclusions are informed by formal consultation responses received during the Regulation 18 consultations in 2023 and 2024, together with ongoing engagement with neighbouring authorities and other key stakeholders under the Duty to Cooperate.
- 1.5 The Topic Paper is underpinned by the evidence base compiled to date, including the Gypsy and Traveller Accommodation Needs Assessment (GTANA, 2020), the updated GTANA (2024), and the subsequent Technical Note (2025), all of which were prepared by specialist consultants Arc4.
- 1.6 The Topic Paper is structured as follows:
 - Section 2 – Background and context, setting out the key stages and decisions relevant to the site selection process.
 - Section 3 – The site identification process, explaining the steps taken to ensure a robust and comprehensive approach, including the Call for Sites, Duty to Cooperate engagement, review of Council-owned land, review of placemaking areas, and availability checks on sites previously submitted through the HELAA.
 - Section 4 – Assessment of sites, setting out how the final Site Selection Methodology was applied and the reasons for discounting sites.
 - Section 5 – Summary of the proposed allocations and explanation of how they meet the identified need.
 - Section 6 – Conclusions to the Site Selection Topic Paper.

2. Context and Background

Gypsy and Traveller Accommodation Needs

- 2.1 The needs of Gypsies and Travellers in the Borough were first identified through the Gypsy and Traveller Accommodation Needs Assessment [GTANA \(2020\)](#). This

concluded that, between 2020 and 2036, there was an overall cultural need for 23 pitches, or 21 pitches when applying the Planning Policy for Traveller Sites (PPTS) definition. The GTANA also recommended provision of a transit site capable of accommodating 12 caravans, while confirming that no need was identified for Travelling Showpeople plots.

- 2.2 In October 2022, the Court of Appeal allowed an appeal brought by Lisa Smith, a Traveller who challenged a planning appeal decision on the basis of indirect discrimination. While the appeal related specifically to that inspector's decision, the Court found that the definition of Travellers in the [Planning Policy for Traveller Sites](#) (PPTS) was itself discriminatory, as it excluded individuals who had permanently ceased travelling due to age or health. The Court concluded that the Government had failed to justify the discrimination inherent in the 2015 PPTS definition.
- 2.3 Following this judgment, the Government amended the definition of Gypsies and Travellers in Annex 1 of the PPTS, reintroducing those who had permanently ceased travelling due to education, ill health, or old age.
- 2.4 In early 2024, the Council commissioned an update of the Gypsy and Traveller Accommodation Needs Assessment (GTANA) to reflect the amended definition. The updated [GTANA \(2024\)](#) identified an increased permanent need of 30 pitches in the period 2020 – 2041, and confirmed the requirement (rather than recommendation) for a transit site capable of accommodating a minimum of 15 caravans. No need was identified for Travelling Showpeople.
- 2.5 In terms of the permanent pitch need, to comply with paragraph 10a of [Planning Policy for Traveller Sites \(December 2024\)](#), the TLP must identify a supply of specific, deliverable sites sufficient to provide five years' worth of sites against the locally set targets. As explained at paragraphs 3.3 - 3.5 of the Submission Draft TLP, taking into account the existing pitch shortfall (17.2 pitches), and needs in the period 2027-2032, (2.8 pitches) this means that the TLP must identify specific, deliverable sites with a capacity for 20 pitches.

Planning Making Process

- 2.6 It was initially intended that the identified Gypsy and Traveller needs (as set out above) would be met through the allocation of sites in the emerging Enfield Local Plan (ELP). However, after several unproductive 'Call for Sites' exercises (in terms of sites being put forward specifically for Gypsy and Traveller use), it became clear that meeting this specific housing need would require more detailed and targeted consideration.
- 2.7 In Spring 2023, the Council therefore resolved to prepare a separate Traveller Local Plan (TLP). A Traveller [Site Selection Methodology \(2023\)](#)¹ was developed to guide the identification of sites suitable for allocation to meet Gypsy and Traveller accommodation needs, refining the methodology previously applied to the Housing and Economic Land Availability Assessment (HELAA) during the ELP site selection stage.
- 2.8 The emerging ELP includes draft Policy H10: Traveller Accommodation. This draft Policy sets out the level of need for traveller accommodation in the period to 2041, as per the GTANA (2020), updated (2024), and commits the Council to preparing a

¹ Please note that this is not the final methodology. The methodology was consulted upon in 2023, and further refined. The final Site Selection methodology can be viewed in Appendix 1 of this Topic Paper.

separate Traveller Local Plan. It also provides some high-level design guidance for new traveller sites.

- 2.9 The TLP will provide more detail on the needs for traveller accommodation, allocates sites to meet the identified Borough needs (including addressing the existing shortfall, and ensuring a 5-year supply of deliverable sites), and confirms the broad locations for meeting traveller needs later in the TLP period. The TLP also provides more detailed guidance on traveller site design.
- 2.10 The following paragraphs summarise the main stages of the TLP plan-making process.

Issues and Options – Regulation 18

- 2.11 In September 2023, the Council consulted on an Issues and Options document under Regulation 18 of the Town and Country Planning Act (as amended). This document set out the purpose of the TLP, explained the plan-making process, and presented a series of issues and potential options for addressing Traveller accommodation needs in the Borough. The key issues considered included how best to meet the identified need, potential locations for new Traveller sites, site size, site design, and the future management of sites.
- 2.12 As part of this consultation, the Council issued a ‘Call for Sites’ to identify potential land capable of meeting Traveller accommodation needs. Three formal submissions were received, as detailed in Section 3. In parallel, neighbouring Local Planning Authorities were contacted under the Duty to Cooperate; however, none confirmed an ability to assist Enfield in meeting its identified need. Further details in relation to the Duty are provided in Section 3.
- 2.13 The feedback received through the Issues and Options consultation supported the consideration of large strategic allocations to help meet Traveller accommodation needs. Accordingly, Crews Hill and Chase Park (two rural placemaking areas within the ELP) were taken forward as reasonable alternatives for meeting the identified Gypsy and Traveller accommodation needs.

Draft TLP – Regulation 18

- 2.14 In response to the limited number of sites put forward for Gypsy and Traveller use, the Council’s Property Services department conducted a further review of the Council’s landholdings, and identified a number of potential sites for further consideration. The identified sites (nine in total), along with the two rural placemaking areas of Crews Hill and Chase Park, were assessed using the Council’s Site Selection Methodology (See Appendix 1 of this Topic Paper), and proposed site allocations were included within the Regulation 18 Draft TLP.
- 2.15 The [Draft TLP](#) was published for consultation in September 2024 under Regulation 18. It set out how the 11 sites (including the 2 rural placemaking areas) had been assessed, identifying those selected as preferred allocations, and those discounted, with a reasoned justification provided in each case. Policy TLP1 within the Draft TLP established the overarching strategy for allocating the preferred sites.
- 2.16 Draft Policy TLP2 sets out design requirements and guidance for new Traveller sites.
- 2.17 Figure 1 below identifies the key stages of the TLP to date.



Figure 1: TLP timeline.

3. Identification of sites

- 3.1 This section of the Site Selection Topic Paper summarises the approach taken to identifying sites for meeting the Borough's Gypsy and Traveller accommodation needs.

Call for sites

- 3.2 As part of the Enfield Local Plan (ELP), several 'Call for Sites' exercises were undertaken to identify land capable of meeting wider housing needs in Enfield up to 2041. Although Bulls Cross was submitted during the 2022 Call for Sites exercise, it was not considered capable of meeting the Borough's identified Traveller accommodation needs in isolation.
- 3.3 The first formal Call for Sites under the new Traveller Local Plan (TLP) process was undertaken in September 2023. Three sites were formally submitted for consideration: two from Enfield's Property Services (Bulls Cross Nursery and Durants Park Bowling Green), both in Council ownership, and one from Haringey Council for land on Great Cambridge Road, known locally as 'The Dell'. However, 'The Dell' was subsequently withdrawn as it was proposed for allocation as housing within the emerging ELP (Site Ref: RUR.01: Land Opposite Enfield Crematorium).
- 3.4 It is noted that during earlier consultations, both residents and Gypsy and Traveller families identified 'The Dell' as a potential location for meeting Gypsy and Traveller needs. However, as the site was formally withdrawn, it is no longer considered available for Traveller accommodation, having instead been allocated for housing development (pending formal consideration by the Planning Inspector as part of the ELP examination process).
- 3.5 A further Call for Sites was undertaken in September 2024. No new sites were submitted during this process, although as set below, the Council's Property Services department did submit seven additional sites in Spring 2024 (see paragraphs 3.13 – 3.16 below).
- 3.6 Although the Call for Sites has never formally closed, no additional sites have been put to the Council, and the Council are not actively seeking additional sites through the Regulation 19 consultation.

Duty to Co-operate.

- 3.7 While the Enfield Local Plan (ELP) and the Traveller Local Plan (TLP) are separate development plan documents, they are closely interlinked. Much of the supporting evidence has been prepared through the ELP examination process, and a log of communications and associated evidence has been compiled. Additional information is also set out within the TLP Duty to Cooperate Compliance Statement (August 2025), which is published alongside this Topic Paper².
- 3.8 In August 2021, as part of the ELP process, Duty to Cooperate letters were issued which expressly sought to discuss Traveller pitch needs. In September 2023, further correspondence connected to the TLP was sent to all seven neighbouring

² The Duty to Co-operate Compliance Statement Can be viewed here:
<https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

authorities, as well as to selected Housing Market Area link authorities, prescribed bodies, and relevant interest groups.

- 3.9 All seven neighbouring authorities responded in 2021, confirming that they were unable to assist with Enfield's unmet housing needs. This included Haringey, which had previously submitted a site for consideration. These responses reflect the significant pressures faced by neighbouring authorities in addressing their own Traveller accommodation needs, and underline the importance of Enfield meeting its identified needs within its own administrative boundary and planning framework.
- 3.10 The second Regulation 18 Draft TLP consultation generated responses from Essex County Council, Hertfordshire County Council, the Greater London Authority, the London Borough of Redbridge, and other statutory consultees. None confirmed an ability to assist Enfield in addressing the identified Traveller accommodation needs.
- 3.11 In February 2025, the Council issued a follow-up letter to all seven neighbouring authorities and to the identified Housing Market Area link authorities, formally requesting confirmation of their current Local Plan position regarding Gypsies, Travellers, and Travelling Showpeople. This correspondence, referencing the updated GTANA (2024), set out the planning and environmental constraints faced by Enfield, including the high proportion of land designated as Green Belt and other protective designations. It confirmed that, in order to meet its identified needs, the Council is proposing to release sites from the Green Belt, and emphasised the importance of understanding the ability (or inability) of neighbouring authorities to provide assistance. The letter also highlighted previous engagement undertaken in October 2023 and September 2024.
- 3.12 All but one³ Local Planning Authority responded to confirm that they were unable to help meet Enfield's identified Gypsy and Traveller accommodation needs.

Comprehensive review of LBE owned sites

- 3.13 At the Issues and Options stage, two sites were formally submitted through the 'Call for Sites': Bulls Cross and Durants Park. However, it was considered unlikely that these sites alone would be sufficient to meet the full extent of Enfield's identified need.
- 3.14 With an updated requirement for 30 permanent pitches and one transit site capable of accommodating at least 15 caravans at one time, the Council commenced internal discussions to consider potential options. It was agreed that the Council's Property Services department should review their entire property portfolio to determine whether any additional sites could be identified and formally submitted to the Local Planning Authority for consideration. This review was carried out by Property Services during early 2024.
- 3.15 The Local Planning Authority provided guidance on the types of sites that would be appropriate and suitable, while Property Services assessed whether the identified sites were available, and would be viable and deliverable. A significant number of sites within LBE's portfolio were discounted on the basis that they were unsuitable (for example, active playing fields, allotments, or land earmarked for future housing development).

³ Harlow Council did not respond. As they are not a neighbouring authority, their capacity to accommodate Enfield's unmet need is considered to be unlikely.

3.16 In Spring 2024, a further seven sites were formally submitted to the Local Planning Authority for assessment. Details of these sites are set out in Section 4, Table 2 below.

Placemaking Areas

3.17 The consideration of the Placemaking areas arose as a direct result of responses at the Issues and Options Stage. Responses showed that there were 2 preferred approaches; the allocation of small sites as well as providing pitches as part of a large housing site. This is set out on page 32 of the [Issues and Options Consultation Statement](#).

3.18 Responses to the Draft TLP queried why not all Placemaking Areas were considered to be reasonable alternatives (and as such, feature within the Integrated Impact Assessment – IIA). To further clarify the position on the Placemaking Areas, an internal assessment was undertaken, as set out in Table 1 below:

Table 1: Placemaking Area Assessment

Placemaking area	Assessment	Conclusion
PL1: Enfield Town	Enfield’s principal town centre, targeted for housing intensification, offices, and enhanced public realm. Highly urbanised, with dense built form and limited land availability. No unconstrained sites capable of meeting Traveller site requirements.	Not a reasonable alternative — Town centre regeneration incompatible; no deliverable sites.
PL2: Southbury	Southbury is identified for residential-led intensification, leveraging its strategic location along the A10 corridor. The area contains a concentration of large-format retail units within Southbury Road Retail Park and surrounding plots. However, the retail park is subject to long-term commercial leases and ownership fragmentation, with no current strategic land assembly or redevelopment proposals that could feasibly support alternative uses such as Traveller sites within the plan period. Furthermore, the area is heavily urbanised, lacks access to green space, and would present challenges in achieving a suitably sized and configured site with an appropriate living environment. Traveller site provision would conflict with wider regeneration aims to create mixed-use, high-density urban quarters along key transport corridors. Not a reasonable alternative. While large parcels exist, deliverability barriers, environmental constraints, and conflict with the Local Plan’s regeneration strategy make the area unsuitable.	Not a reasonable alternative - due to deliverability and policy alignment factors.
PL3: Edmonton Green	Edmonton Green is undergoing strategic renewal centred on high-density, mixed-use development, public realm enhancement, and major infrastructure upgrades. The area includes large	Not a reasonable alternative - due to deliverability and

Placemaking area	Assessment	Conclusion
	<p>supermarkets and associated surface-level parking, and it is acknowledged that Edmonton Green is home to an established Traveller community. However, the land supply is either committed through existing consents (including residential tower schemes and shopping centre redevelopment) or integral to the delivery of planned growth and town centre renewal. Surface parking areas are earmarked for redevelopment or essential to servicing existing uses. Identifying new Traveller sites within Edmonton Green would not align with the Local Plan strategy for regeneration, could conflict with investment confidence, and would fail to provide an appropriate residential environment given the high-density urban form, air quality issues, and lack of accessible private outdoor space. Not a reasonable alternative. Although there is an existing Traveller community nearby, land availability, regeneration objectives, and environmental constraints make new Traveller site delivery in this location unsuitable.</p>	<p>policy alignment factors.</p>
<p>PL4: Angel Edmonton</p>	<p>Angel Edmonton is a key area for town centre renewal, focused on sustainable, transport-led growth, including enhancements to the public realm, housing-led intensification, and active travel infrastructure. The area contains some large-format retail and associated parking (e.g., supermarkets), and it is recognised that a sizeable Traveller community is located in and around Angel Edmonton. However, available land parcels are highly constrained and are either already committed for redevelopment, critical to delivering active travel priorities, or essential for town centre servicing. Introducing new Traveller sites into this strategic growth corridor would risk undermining regeneration and infrastructure objectives, would conflict with the planned higher-density residential character, and would not provide an appropriate living environment given the location's exposure to major roads (e.g., North Circular Road) and poor air quality. Not a reasonable alternative. Despite the existing Traveller presence and surface parking land, strategic development pressures, environmental constraints, and the unsuitability of the urban environment for new Traveller site delivery justify not progressing Angel Edmonton as a reasonable alternative.</p>	<p>Not a reasonable alternative - due to deliverability and policy alignment factors.</p>

Placemaking area	Assessment	Conclusion
<p>PL5: Meridian Water</p>	<p>Meridian Water is London’s largest regeneration project, with a committed delivery programme delivering over 10,000 new homes, significant commercial space, extensive public realm improvements, and strategic transport infrastructure upgrades. While it is acknowledged that Meridian Water is intended to become a mixed and inclusive community — theoretically capable of accommodating a diverse range of needs — in practice, the masterplan is highly structured, with most land parcels already committed through detailed planning permissions (e.g., Meridian One) or locked into funding agreements with the GLA and central government. Introducing Traveller site allocations into Meridian Water would significantly disrupt the strategic masterplanning framework, threaten funding agreements and delivery timetables, and undermine the coherence of the overall vision. Furthermore, the Council’s delivery responsibilities — including estate regeneration, affordable housing commitments, and placemaking requirements — impose additional pressures on available land parcels, leaving no realistic residual land suitable for Traveller site provision without fundamentally compromising the project.</p>	<p>Not a reasonable alternative — although Meridian Water aspires to be a mixed community, the existing masterplanning, strategic delivery agreements, planning consents, and funding dependencies make it unsuitable for new Traveller site allocations, without substantial risk to project viability and delivery.</p>
<p>PL6: Southgate</p>	<p>Primarily focused on enhancement of Southgate’s District Centre and station area. Urban infill and intensification expected. No new strategic land releases identified.</p>	<p>Not a reasonable alternative — incompatible town centre strategy; no available land.</p>
<p>PL7: New Southgate</p>	<p>Targeted for focused regeneration around New Southgate station. Land availability is extremely limited, with emphasis on compact, high-density residential growth.</p>	<p>Not a reasonable alternative — no identified deliverable land parcels.</p>
<p>PL8: Palmers Green</p>	<p>Focused on improving the town centre environment and small-scale housing intensification. Dense urban form with no new land allocation.</p>	<p>Not a reasonable alternative — town centre renewal priority; unsuitable for Traveller site needs.</p>
<p>PL9: Rural Enfield</p>	<p>Encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.</p>	<p>Not a reasonable alternative — rural context not aligned to Local Plan growth strategy outside of Chase Park/Crews Hill.</p>

Placemaking area	Assessment	Conclusion
<p>PL10: Chase Park</p>	<p>Chase Park is identified in the Enfield Local Plan as a future opportunity area capable of supporting long-term, sustainable growth, subject to further masterplanning and detailed evidence gathering. It sits at a pivotal transition between the suburban edges of Enfield and the wider rural landscape, presenting a rare opportunity to deliver a balanced, landscape-led community that meets diverse housing needs, including those of the Traveller community. While the area is currently designated as Green Belt, it is not constrained by existing strategic permissions, complex legal agreements, or committed delivery frameworks, offering genuine flexibility in masterplanning. Chase Park’s scale, location, and future development trajectory make it uniquely capable of accommodating Traveller site provision as part of an inclusive, mixed, and sustainable neighbourhood strategy. Provision here would support wider Local Plan objectives on diversity, social cohesion, environmental enhancement, and sustainable placemaking.</p>	<p>Reasonable alternative, Chase Park is actively considered for Traveller provision due to its strategic potential, flexibility, and ability to deliver genuinely inclusive growth as part of a new community framework.</p>
<p>PL11: Crews Hill</p>	<p>Crews Hill, located at the northern edge of the borough, is identified within the Enfield Local Plan as a key future development opportunity. While designated as Green Belt, the area contains significant parcels of previously developed and underutilised land, including former horticultural, commercial, and light industrial uses. This presents a rare opportunity to accommodate a variety of community needs, including dedicated Traveller site provision, as part of a broader landscape-led regeneration strategy.</p> <p>Although Crews Hill features a complex land ownership pattern, with over 80 landowners this diversity provides flexibility for the Local Planning Authority to engage with multiple delivery options and to strategically plan phased development. Rather than a constraint, this can enable targeted land assembly for Traveller needs without being reliant on a single large-scale developer or strategic landowner. Additionally, there are currently no binding delivery agreements, planning consents, or infrastructure dependencies that would otherwise limit the inclusion of Traveller provision. A masterplan is now being progressed for Crews Hill, creating a platform to integrate Traveller sites thoughtfully within a wider programme of sustainable growth, environmental restoration, aligning fully with Local Plan ambitions for inclusive and resilient communities.</p>	<p>Reasonable alternative — Crews Hill is actively considered due to its available land, masterplanning flexibility, multiple land assembly opportunities, and ability to deliver inclusive, sustainable development in line with strategic policy objectives.</p>

Placemaking area	Assessment	Conclusion

3.19 In summary, only Chase Park (PL10) and Crews Hill (PL11) are considered reasonable alternatives for the purposes of the Regulation 19 Traveller Local Plan and Integrated Impact Assessment (IIA) work. None of the other Placemaking Areas (PL1–PL9) are considered suitable or deliverable in terms of meeting Gypsy and Traveller Accommodation needs, for the following reasons:

- Strategic commitments already made through planning consents and funding agreements (e.g., Meridian Water).
- Incompatible uses (e.g., town centre intensification, employment hubs).
- Lack of available land suitable for Traveller site requirements.
- Environmental and policy constraints (particularly Green Belt villages outside of planned releases), (PL9).

HELAA sites

3.20 In accordance with the final Site Selection Methodology (See Appendix 1 of this Topic Paper), the starting point for identifying potential sites was the HELAA. The deliverable and developable sites within the HELAA were all taken forward in the ELP to help meet housing (and employment) needs in the Borough in the period up to 2041, and were not therefore available to help meet Gypsy and Traveller Accommodation Needs. The sites within the HELAA that were rejected 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 suitable for meeting Traveller accommodation needs. In addition, these sites have not been promoted for meeting Traveller accommodation needs, and therefore are not considered available.

3.21 Nonetheless, to test the position on the HELAA sites, a letter was issued in September 2024 to all landowners who had submitted sites through the ELP’s wider ‘Call for Sites’. The purpose was to confirm whether their sites remained available and to establish whether they might be suitable for development as Traveller accommodation. The letter also invited landowners to identify any additional sites that could potentially be considered.

3.22 Only one response was received, from Transport for London (TfL), confirming that none of their sites would be available for this particular use.

3.23 In summary, no privately owned sites potentially suitable for meeting Traveller accommodation needs have been promoted, despite efforts by the Council to encourage private landowners to submit potential sites for Traveller use. The Council therefore has no evidence of other sites being available for meeting Traveller accommodation needs, over and above the nine sites submitted by the Council’s Property Services department. Whilst no specific sites have been put forward at the Crews Hill and Chase Park placemaking areas, the Council considers that the scale of these developments, and the required masterplanning exercises, afford the potential opportunity to deliver Traveller pitches within these placemaking areas, later in the Traveller Local Plan period.

4. Assessment of sites

Overall need

- 4.1 There is an overall need for 30 permanent Gypsy and Traveller pitches across the Borough in the period 2020/21 to 2040/41 (see Table 1 below). Of this total, 16 pitches are required to address the existing pitch shortfall in the period up to 2024/25, and the remaining 14 pitches are needed over the subsequent Plan period up to 2040/41.
- 4.2 Consequently, Enfield's need for 'permanent' pitches can be summarised as follows:

Table 2: Gypsy and Traveller pitch need 2020/21 to 2040/41 (also known as permanent provision)

Period	Pitch need	Annualised need
Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	16	3.2
Longer-term need		
Over period 2025/26 to 2029/30 (B)	3	0.6
Over period 2030/31 to 2034/35(C)	4	0.8
Over period 2035/36 to 2040/41 (D)	7	1.4
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	

Source: Table ES1 [GTANA \(2024\)](#)

- 4.3 Assuming adoption of the TLP in 2026, the existing pitch shortfall will have increased to 17.2 pitches. This is on the basis that in addition to the shortfall for the period 2021/22 to 2024/25 (16 pitches) an allowance of 0.6 pitches per annum must be added for 2025/26 and 2026/27.
- 4.4 As set out in paragraph 2.5 of the Submission Draft Plan, the TLP needs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the locally set pitch target (at the point of adoption). This requires consideration of need for the years 2027/28 to 2031/32. The annual pitch needs over this period are as follows: 2027/28 0.6, 2028/29 0.6, 2030/31 0.8, 2031/32 0.8. Therefore, the overall 5-year need for the period 2027/28 to 2031/32 is 2.8 pitches.
- 4.5 As such, the required need for a 5-year supply from the point of adoption of the TLP is 20 pitches (i.e. 17.2 pitches, plus 2.8 pitches).

Sites to be assessed

4.6 The shortlist of nine sites and two broader placemaking areas is set out in table 3 below.

Table 3: Shortlist of sites (and two broader placemaking areas) to be assessed through the TLP (as per the Draft TLP (September 2024)).

Site Reference ⁴	Site name / address	Ward	Site source
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Whitewebbs	Submitted through Call for Sites
TLP_02	Durants Park Bowling Green (EN3 5JE)	Brimsgate	Submitted via LBE property
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	Ridgeway	Submitted via LBE property
TLP_04	Hillyfields Depot & Land (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 District	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 A10, Skate Park (N9 9HW)	Bush Hill Park	Submitted via LBE property
TLP_10	Chase Park	Ridgeway/Cockfosters/Oakwood	ELP Place Making area (Policy 10)

⁴ Site references refer to Draft TLP referencing from September 2024.

TLP_11	Crews Hill	Whitewebbs / Ridgeway	ELP Place Making area (Policy 11)
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4.7 All nine sites and 2 placemaking areas were assessed in line with the Gypsy and Traveller Site Selection Methodology (2024) (as set out within Appendix 1 of this Topic Paper) to assess their potential suitability for allocation specifically for Gypsy and Traveller provision.

Applying the Site Selection Methodology

4.8 The Traveller Site Selection Methodology derived originally from the [Housing and Economic Land Availability Assessment](#) (HELAA – April 2023). The methodology was developed in 2023, upon Enfield deciding to produce a separate Local Plan to meet the identified needs of Gypsies and Travellers.

4.9 A draft of the Site Selection Methodology was consulted on as part of the TLP Issues and Options consultation in September 2023. Responses⁵ were considered, and the methodology was updated and published alongside the Draft TLP Regulation 19 in September 2024. The [Site Selection Paper \(June 2024\)](#) sets out the final Site Selection Methodology (but is also set out in Appendix 1 of this Topic Paper for ease of reference) that was applied to all associated site assessments. There were 6 stages to the methodology. Set out below is an overview of the methodology, and the conclusions for the nine sites and two placemaking areas assessed.

4.10 **Stage 1: Identification and initial sift of sites – comprising three sub-stages:**

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

4.11 **Stage 1a – Identification of sites** - All nine sites identified were promoted directly through the Council’s Property Services department. In addition, the Crews Hill and Chase Park placemaking areas were identified for further consideration. No sites have been promoted to the Council for Gypsy and Traveller provision by private landowners. See section 3 of this Topic Paper for additional information in relation to identifying sites.

4.12 **Stage 1b – Assessment of absolute constraints** - The nine identified sites and two placemaking areas (broad locations) have been assessed against absolute constraints (Level 1 constraints). The list of absolute constraints was drawn from national and local policy designations. The full list of absolute constraints is set out in paragraph 4.12 below. Sites lying wholly within a Level 1 constraint area would have been excluded from further consideration, however none of the sites submitted to the Council fell wholly within a Level 1 constraint area. In terms of the two placemaking areas, the majority of these areas were not subject to Level 1 constraints, and therefore they progressed to the next stage of the site assessment process.

⁵ https://www.enfield.gov.uk/data/assets/pdf_file/0022/63940/Traveller-local-plan-issues-and-options-consultation-statement-Planning.pdf - see page 30 which refers to a request to include flood risk.

4.13 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

4.14 **Stage 1c – Size Threshold and Planning History** - As set out in the Gypsy and Traveller Site Selection Methodology (2024) (see Appendix 1), 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 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 sites were also assessed. The criteria excluded sites that had live planning permissions for housing, except in instances where permissions have lapsed, or where the planning permission was for Gypsy and Traveller accommodation.

4.15 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)

4.16 It should be noted that one site that fell below the 0.3ha threshold for consideration (Land at A10) had been identified as suitable for transit provision with the capacity to provide 6 transit pitches (which equates to space for circa 12 – 15 caravans). This site was therefore taken forward for further consideration the site assessment process:

- Land at A10, N9 9HW (TLP_09)

4.17 **Stage 2: Promoting a Sustainable Pattern of Development** - The remaining six sites and two placemaking areas were taken forward to Stage 2 of the site assessment process, where consideration was given to their location, and whether they were brownfield sites.

4.18 **Stage 2a: Sites considered on a sequential approach directing growth to specific locations** - The Site Assessment Methodology prioritised sites within the urban area that were brownfield (previously developed land), with priority then given to accessible Green Belt sites, and then the lowest prioritisation given to

greenfield isolated Green Belt sites (see Table 03 of the Site Selection Methodology, attached as Appendix 1).

- 4.19 This stage in the Site Selection Methodology would have been more effective if the Council had a long list of potential site options. In practice, all of the remaining six sites were either in the Green Belt, or on land designated as Metropolitan Open land (MOL). There were some differences between the sites, in terms of their accessibility, and some of the sites included areas of brownfield land. However, in applying the subsequent stages of the Site Selection Methodology (see below), it became clear that technical constraints and deliverability issues would further limit the options available to the Council in terms of applying the “prioritisation” and selecting the sites to be allocated to meet Gypsy and Traveller accommodation needs.
- 4.20 The two placemaking areas are proposed for release from the Green Belt, but at the time of assessment, comprised Green Belt land. The accessibility of these placemaking areas will change as the development proposed for these areas in the emerging Enfield Local Plan (ELP) is delivered (later in the TLP period).
- 4.21 **Stage 3: Detailed Planning Assessment** - Sites promoted for Gypsy and Traveller provision at this stage were assessed to ensure they met the specific requirements for Gypsy and Traveller provision.
- 4.22 **Stage 3a – Consideration of Technical Constraints** - This stage involved consideration/assessment of the physical and environmental constraints of promoted sites in accordance with Planning Practice Guidance⁶. At this stage where significant environmental and/or physical constraints are identified, sites were not be taken forward for further consideration.
- 4.23 **Stage 3b – Consideration of other non-absolute constraints** - The assessment of sites at this stage comprised 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 was also considered.
- 4.24 Sites were assessed against how they performed against the various criteria and whether constraints can be overcome for each site. The Gypsy and Traveller Site Selection included assessment criteria relating to non-absolute constraints, which identified the sites’ specific suitability of Gypsy and Traveller provision. This approach helped to ensure that the sites selected will meet the specific needs of the Gypsy and Traveller community. A full list of assessment considerations can be found in Appendix 1 of this Topic Paper, 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.

⁶ <https://www.gov.uk/government/collections/planning-practice-guidance>

- 4.25 TLP_07 Land Sterling Way / Weighbridge was found to be a heavily constrained site. It is a designated SINC, as well as being partially within flood zones 3a and 3b. It was discounted from further consideration on this basis.
- 4.26 **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 TLP and is a key part of the evidence base of the TLP. The SA is integrated in the Integrated Impact Assessment (IIA) which also includes 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)
- 4.27 Sites have been considered against the objectives included in the Regulation 18 [IIA](#) (2023). The full list of IIA objectives are set out in Appendix 3 of the Traveller Local Plan Site Selection Methodology (see Appendix 1 of this Topic Paper).
- 4.28 Sites taken forward for potential allocation were then assessed through the IIA⁷ which comprised a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Community Safety Impact Assessment (CSIA). All nine sites were subject to the IIA, alongside the two rural placemaking areas. The Submission Draft TLP (Regulation 19) has been fully informed by the IIA testing as a qualitative assessment in addition to other evidence that emerged through or outside of the site assessment process.
- 4.29 **Stage 5: Deliverability** - At this stage sites were considered for their deliverability within the TLP period, including timescales and phasing of delivery. 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; (e.g. whether the site would be Council owned and run, or managed by a third party, or private land owner).
 - 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).

⁷ The IIA which supports the Submission Draft TLP can be viewed here: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

- 4.30 At this stage, TLP_02 Duran’s Park Bowling Green, EN3 5JE (TLP_02) was identified as not deliverable due to legal issues associated with the site and could no longer be considered available.
- 4.31 TLP_06 Dove Lane, Potters Bar (EN6 2SH) was discounted as this site was confirmed as being unavailable. Whilst the Council owned this site, it is located within Hertsmere Borough. The site has also been earmarked as a potential housing site by Property Services. It has not been promoted again, nor has Hertsmere Council offered to consider it under the Duty to Cooperate.
- 4.32 The overall conclusions of all of the site assessments can be viewed in table 4 below.

Table 4: Post Site Selection Conclusions

Site Reference	Site name / address	Conclusion after Site Selection Methodology applied
TLP_01	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Proposed for allocation (permanent provision). No insurmountable technical or delivery constraints, existing defensible boundaries. Well screened from view, with limited impact on surrounding areas. Existing highway access.
TLP_02	Durants Park Bowling Green (EN3 5JE)	Discounted at Stage 5. Legal issues have been identified on the site, and the site is no longer considered to be available
TLP_03	Land Adjacent to Ridgeway (EN2 8AE)	Proposed for allocation (permanent provision). No insurmountable technical or delivery constraints, existing defensible boundaries, although these have been reviewed as part of the Capacity Assessment (given the awkward shape of the site). Well screened from view with existing vegetation meaning limited impact on surrounding areas. Existing highway access, and opportunity to create an improved access point utilising the unused road to the north of the site.
TLP_04	Hillyfields Depot & Land (EN2 0HN)	Discounted at Stage 1c. Site below the 0.3ha site size threshold for selection.

TLP_05	Comreddy Close (EN2 8RN)	Discounted at Stage 1c. Site below the 0.3ha site size threshold for selection
TLP_06	Dove Lane, Potters Bar (EN6 2SH)	Discounted at Stage 5. Site located outside of the Enfield Borough boundary and would need to be promoted and allocated through Hertsmere Borough Council which is has not been done. This site is therefore not considered to be deliverable for this type of use.
TLP_07	Land Sterling Way / Weighbridge (N18 1BH)	Discounted at Stage 3b. The site is within a Borough SINC, a watercourse divides the site, it's partially within Flood Zone 3a and 3b, it's 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. Discounted on the basis of a combination of technical and non-absolute constraints.
TLP_08	Land south of Dendridge Close (EN1 4PN)	Discounted at Stage 1c. The site is partially covered by Flood Zone 3a,3b and 2 and approximately 95% is within a Borough SINC. Adjacent to substation/gas tanks and access track runs through the site. Heavily constrained due to site dimensions and topography. Grade 3 agricultural land (with a soil survey required to establish whether in Grade 3a. Discounted on the basis of a combination of technical and non-absolute constraints.
TLP_09	Land A10, Skate Park (N9 9HW)	Proposed for allocation (Transit provision). No insurmountable technical or delivery constraints, existing defensible boundaries. Existing highway access onto a main through-route of the Borough. There is existing hard standing, and an existing building on-site

		which can be utilised as part of the site management.
TLP_10	Chase Park	Proposed for allocation (longer term permanent provision). No insurmountable technical or delivery constraints. It is anticipated that this placemaking area will be allocated through the ELP, with detailed coming via the forthcoming SPD. Defensible boundaries are either existing, or will be created as part of the wider place-making process.
TLP_11	Crews Hill	Proposed for allocation (longer term permanent provision). No insurmountable technical or delivery constraints. It is anticipated that this placemaking area will be allocated through the ELP, with detailed coming via the forthcoming SPD. Defensible boundaries are either existing, or will be created as part of the wider place-making process.

A map of all sites assessed can be viewed on page 14 of the [Draft TLP Regulation 18](#).

5. Proposed Site Allocations

- 5.1 Following the discounting of unsuitable sites, on the basis that they were either too small, had significant technical and non-absolute constraints, or were not deliverable (as set out in Section 4) above, three specific sites and two broad locations have been identified as having potential to accommodate the identified permanent and transit accommodation needs within the Borough. These are:
- **TLP_01: Bulls Cross Nursery** (referred to as ‘Site 1’ in the Regulation 19 Plan, to accommodate permanent pitches)
 - **TLP_03: Land Adjacent to the Ridgeway** (referred to as ‘Site 2’ in the Regulation 19 Plan, to accommodate permanent pitches)
 - **TLP_09: Land at A10** (referred to as ‘Site 3’ in the Regulation 19 Plan, to accommodate transit provision).
 - **TLP_10: Chase Park** (to meet the longer-term permanent pitch need)
 - **TLP_11: Crews Hill** (to meet the longer-term permanent pitch need)

Bulls Cross Nursery (Site 1)

- 5.2 Following the site assessments, the Council has identified Bulls Cross as a suitable location for permanent Traveller accommodation, with capacity to deliver at least 8 pitches on the 0.5ha site. This allocation will contribute towards addressing the immediate shortfall (2020/21–2024/25), the short-term need (to 2029/30), and part of the longer-term requirement (2030/31–2031/32). Importantly, the site is required to ensure a deliverable five-year supply from the date of adoption of the TLP.
- 5.3 To the west of the site lies Myddelton House, a Grade II Registered Park and Garden which also contains several Grade II listed buildings. The site itself is located within the Green Belt and falls within the Forty Hill Conservation Area. Development of the site will be required to demonstrate that it conserves and enhances the historic environment (see TLP site allocation proforma).
- 5.4 The Green Belt and Metropolitan Open Land Study (LUC)⁸ finds that all of the Green Belt land in the Borough meets at least one of the five purposes of the Green Belt as set out in NPPF⁹ (paragraph 143). All of the Green Belt land in the Borough is considered to make a strong contribution to Green Belt purpose 5 (assisting in urban regeneration, by encouraging the recycling of derelict and other urban land).
- 5.5 The Bulls Cross site sits within a parcel that makes a strong contribution to Green Belt purpose 1 (to check the unrestricted sprawl of large built-up areas), makes a weak/ no contribution to Green Belt purpose 2 (to prevent neighbouring towns merging into one another), makes a relatively strong contribution to Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment) and

⁸ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

makes a strong contribution to Green Belt purpose 4 (to preserve the setting and special character of historic towns).

- 5.6 Evidence on the Green Belt is however just one consideration in the list of matters that influence the decision-making processes. The acute need to provide Traveller accommodation in the short and medium term, coupled with the lack of suitable alternative deliverable sites, is considered to outweigh the harm to the Green Belt.
- 5.7 New Green Belt boundaries will be established by utilising the existing site boundary which is made up on metal railings, and established vegetation which surround the site on all sides. The site boundary as provided within the Capacity Assessment (August 2025) would define the new Green Belt boundary.
- 5.8 The site is well connected to the highway network with existing access (road and pavement) into the site. It is considered that the site has enough space for at least 8 pitches, with space left for safe vehicular movement (including turning), and the required amenity space proposed on-site.
- 5.9 The site, which is currently vacant and in Council ownership, comprises a relatively flat partially grassed area (with some hardstanding areas) enclosed on all sides by mature vegetation, providing a natural degree of screening. The land contains no existing buildings although there are some disused polytunnel structures which are in situ. Visibility into the site at present is extremely limited.
- 5.10 The closest GP is 25 minutes' walk, as is the closest supermarket. The closest bus stop is approximately 6 minute walk away with the closest train station (Turkey Street Station) – approximately 12 minute walk. The site is ideally located to schools, with primary being a 10 minute walk, and secondary a 4 minute walk. The site is therefore considered to have relatively good access to services.
- 5.11 It is anticipated that a planning application for development of the site will be submitted in Spring 2026. It is understood that the site promotor is engaging with the planning authority.

Land Adjacent to Ridgeway (Site 2)

- 5.12 The Council will promote land adjacent to The Ridgeway for the delivery of at least 12 pitches on the 1.1ha site. While the Draft TLP originally identified potential capacity for 22 pitches (including the option to subdivide the land into two smaller sites), the subsequent Capacity Assessment (August 2025) concluded that, due to the triangular shape of the site, a capacity of 12 pitches is more appropriate. Provision beyond 12 pitches would necessitate additional communal buildings and other shared facilities, requiring a larger proportion of the site to be allocated to non-residential uses.
- 5.13 As stated above, the Green Belt and Metropolitan Open Land Study (LUC)¹⁰ finds that all of the Green Belt land in the Borough meets at least one of the five purposes of the Green Belt as set out in NPPF¹¹ (paragraph 143). All of the Green Belt land in the Borough is considered to make a strong contribution to Green Belt

¹⁰ https://www.enfield.gov.uk/_data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

¹¹ <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

purpose 5 (assisting in urban regeneration, by encouraging the recycling of derelict and other urban land).

- 5.14 The Ridgeway Site sits within a parcel that makes a relatively strong contribution to Green Belt purpose 1 (to check the unrestricted sprawl of large built-up areas), makes a relatively strong contribution to Green Belt purpose 2 (to prevent neighbouring towns merging into one another), makes a strong contribution to Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment) and makes a weak / no contribution to Green Belt purpose 4 (to preserve the setting and special character of historic towns).
- 5.15 Again, evidence on the Green Belt is however just one consideration in the list of matters that influence the decision-making processes the acute need to provide Traveller accommodation in the short and medium term, coupled with the lack of suitable alternative deliverable sites, is considered to outweigh the harm to the Green Belt.
- 5.16 The site, which is currently vacant and in Council ownership, comprises a relatively flat grassed area enclosed on all sides by mature vegetation, providing a natural degree of screening. The land contains no existing buildings or structures. Access can be gained via an existing gate on the eastern boundary, however as set out with the TLP site proforma, access will be improved via a Council owned, disused access road to the north of the site which will create a safer, and more private access into the site. Visibility into the site is limited at present, with the exception of the existing gateway to the east of the site.
- 5.17 New Green Belt boundaries can be established by utilising the existing planted site boundary to the north, east and south of the site. As noted within the Capacity Assessment (August 2025), the site is of triangular shape. There is an area of grass and scrub to the west of the site which can provide an area for biodiversity enhancement. It is anticipated that a new defensible boundary would be 'planted' to create the western boundary. This is illustrated in the Capacity Assessment (August 2025) as a 'new planted secure line'.
- 5.18 Bus stops are located immediately adjacent to the site, and provide a regular service, ensuring that services are easily accessible. The closest GP is 7 minutes away by public transport, with primary school 13 minutes and secondary school 15 minutes by bus. The closest supermarket is 6 minutes by bus. The site is therefore considered to have good access to services.
- 5.19 It is anticipated that a planning application for development of the site will be submitted in Summer 2026 which is dependent upon detailed design and other pre-application considerations.

Land at the A10 (Site 3)

- 5.20 Numerous responses to the Draft TLP Regulation 18 consultation raised concerns that the site was too small to accommodate the required capacity of 15 caravans. Following further discussions with colleagues in transport and design, it was concluded that the site could not be accessed safely in its existing form, as there was insufficient space to provide the required turning circle. The Council's Property Services department subsequently confirmed that land to the west (currently occupied by a skate park) could be incorporated to extend the site. To avoid any net loss of open space, the skate park would need to be relocated. It is

understood that this is being considered outside of the TLP process. An extended red line boundary was therefore submitted to the Local Planning Authority for assessment in Spring 2025.

- 5.21 The enlarged site now provides an area of 0.3ha. According to the Capacity Assessment (August 2025), this extended area is capable of accommodating 16 caravans while also providing sufficient space to enable safe vehicular movement into and out of the site (including vehicular turning). The Council will promote this extended site to accommodate 16 caravans as a Transit site.
- 5.22 In terms of MOL, the Green Belt and Metropolitan Open Land Study (LUC¹²) finds that the majority of the Borough's MOL makes a strong contribution to at least one MOL criterion. The Land at A10 site is not within an area of MOL highlighted within the Green Belt and MOL Study (see paragraph 7.5) as making the greatest contribution to the greatest number of MOL criteria.

The main contribution of the Land at A10 site to MOL purposes, is in relation to Criterion 1 (contribution to the physical structure of London by being clearly distinguishable from the built-up area). A finer grain assessment of the Land at the A10 site itself, shows that the existing built form on the site, in terms of a disused public WC building, skate park and hardstanding, results in a less clear distinction between the built-up area and this part of the Borough's MOL.

- 5.23 The only available and most suitable sites to address the identified shortfall and short-term need (2020/21–2029/30) are located within the Green Belt: Bulls Cross Nursery (Site 1) and Land Adjacent to The Ridgeway (Site 2). The only available Transit site is Land at A10 (Site 3), which is designated as MOL. The Council has given detailed consideration to the exceptional circumstances required to justify amendments to the Green Belt boundary in order to meet permanent pitch needs, as set out in the Exceptional Circumstances Topic Paper (September 2025).
- 5.24 The site is adjacent to Edmonton cemetery which is locally listed (as well as Cemetery House), however the site is currently heavily screened from view of the cemetery by existing mature vegetation.
- 5.25 The site benefits from an accessible transport route via the A10 (known as Great Cambridge Road), which is one way. A green buffer is proposed along the boundary to Great Cambridge Road, to improve acoustic privacy. Existing areas of hardstanding, and an existing amenity building, which are considered essential for the delivery of a Transit site.
- 5.26 There is existing pedestrian access to the site from Great Cambridge Road, The footpath leading to the cemetery from Great Cambridge Road (to the east of the site) will be redirected to the rear of the existing toilet block to ensure that this thoroughfare is maintained (and improved).
- 5.27 The closest GP is a 12 minute walk away. The closest supermarket is 28 minutes away by foot, although there are smaller convenience stores within the immediate vicinity. It is not anticipated that site users will require access to education, given the temporary nature of the site, however the closest primary school is 14 minutes walk, and secondary school is 9 minutes' walk away. The site is therefore considered to have good access to services.

¹² https://www.enfield.gov.uk/data/assets/pdf_file/0030/54678/Green-belt-and-MOL-assessment-2023-Stage-3-LUC-Planning.pdf

- 5.28 It is anticipated that a planning application for development of the site will be submitted in 2026 further to the Skate Park being relocated. This re-provision is anticipated to provide improved skating facilities.

Chase Park and Crews Hill

- 5.29 At present, both of these broad locations are predominantly designated as Green Belt and/or Metropolitan Open Land (MOL). Should these areas be allocated within the ELP, they could arguably represent more sustainable locations than Sites 1, 2 or 3 identified in the TLP. However, the Council does not believe that these areas can address (or help to address) the requirement for a supply of specific, deliverable sites sufficient to provide five years' worth of supply against the locally set targets. The Council cannot be confident that these placemaking areas will deliver new traveller accommodation before 2031.
- 5.30 The two rural placemaking areas of Crews Hill and Chase Park have been the subject of debate at the ELP Examination, and the independent Inspector's view on these proposed placemaking areas will not be known until next year (2026). As importantly, the ELP policies for these placemaking areas (PL10: Chase Park, and PL11: Crews Hill) require comprehensive masterplans to be prepared and approved by the Council, to inform future planning applications. In advance of this masterplanning work (and indeed, in advance of the ELP Inspector's view on the Crews Hill and Chase Park placemaking areas), it would not be appropriate for the TLP to seek to allocate a specific site or sites within these placemaking areas to meet the identified 20 permanent pitch (including the existing pitch shortfall). The risk would be that allocating specific sites for Traveller accommodation, in advance of the further masterplanning work, may adversely impact upon the deliverability of important infrastructure, as well as other important development objectives.
- 5.31 The Council is committed to progressing the masterplanning work for these two placemaking areas apace, but at this time, the Council does not believe that these areas can address (or help to address) the requirement for a supply of specific, deliverable sites sufficient to provide five years' worth of supply against the locally set targets. With the need for the masterplanning work to conclude before it would be appropriate to identify a specific site or sites, the potential need for land owner negotiations, and then the need for a planning application or applications (potentially as part of a wider proposal), the Council cannot be confident that the placemaking areas will deliver new traveller accommodation before 2031.
- 5.32 The implication, in terms of the TLP strategy options, is that the combination of sites to be allocated in the TLP to provide five years' worth of sites (i.e. sites to accommodate 20 permanent pitches, and a transit site which can accommodate at least 15 caravans at one time), must be drawn from the list of sites under paragraph 4.13 above. All of these sites are in the Green Belt, or are designated as MOL. Consequently, it is part of the Council's exceptional circumstances case that given the thorough assessment made of potential approaches to accommodating Traveller needs, sites within the Green Belt or on MOL need to be allocated in the TLP, if Traveller accommodation needs are to be met in accordance with the Government's Planning Policy for Traveller sites.
- 5.33 To ensure that the longer-term requirement for permanent pitch provision (covering the period 2030/31–2040/41) is met, the Proposed Submission Plan allocates a

pitch requirement to the broad areas of Chase Park (formerly known as TLP_10) and/or Crews Hill (formerly known as TLP_011).

- 5.34 The masterplanning processes for Crews Hill and Chase Park are expected to identify suitable land capable of accommodating permanent pitch provision. Importantly, however, these pitches will only be required if sufficient alternative provision has not been secured in the shorter term.
- 5.35 There may be potential to accommodate additional pitches at the Bulls Cross Nursery site and on land adjacent to The Ridgeway. Furthermore, planning applications may come forward for pitches on other land not specifically allocated within the TLP.

6. Conclusion

- 6.1 This Site Selection Topic Paper demonstrates that the Council has undertaken a thorough and comprehensive process of site identification. Following several unsuccessful 'call for sites' exercises, the Council had no alternative but to review its own land holdings. A detailed assessment of the London Borough of Enfield (LBE) property portfolio was therefore undertaken, and additional sites were subsequently submitted for consideration.
- 6.2 All submitted sites have been assessed through a robust Site Selection Methodology. This methodology was subject to public consultation and refined to ensure it specifically addressed the accommodation needs of Gypsies and Travellers.
- 6.3 The Council has engaged consistently and transparently, not only with Duty to Cooperate partners but also with all parties that submitted sites through the HELAA process. Each Placemaking Area has been assessed in detail, with only two locations considered suitable to contribute to meeting the identified need.
- 6.4 As such, the proposed allocations represent the only viable and deliverable options available to the Council, ensuring that the identified need for Gypsy and Traveller accommodation is addressed in a fair, proportionate, and evidence-based manner. The sites within the Proposed Submission Plan (Regulation 19) are considered to be sound.

Appendix 1: Traveller Local Plan Final Site Selection Methodology:

London Borough of Enfield

Traveller Site Selection Methodology (update)

October 2023

www.enfield.gov.uk



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?

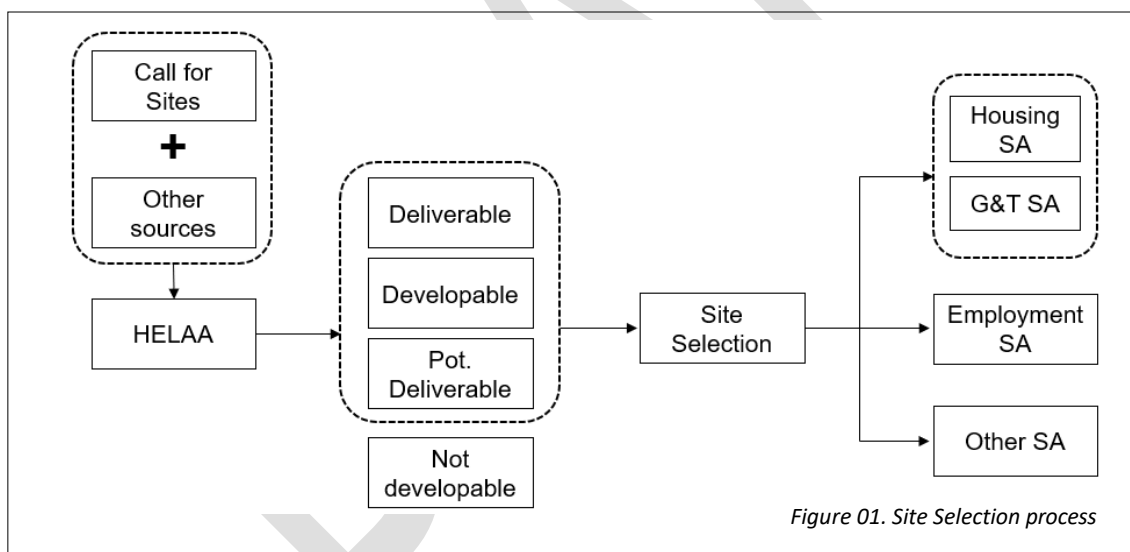
Could any proposed G&T criteria be combined and/or simplified to streamline the process of assessing sites for Gypsy and Traveller accommodation?

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1. Introduction

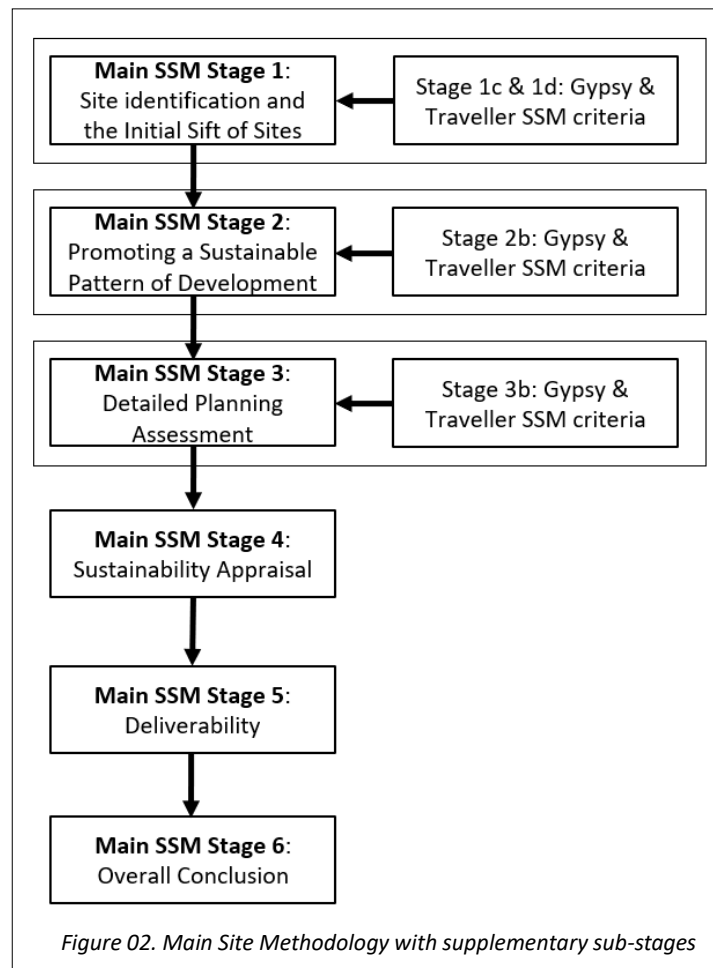
- 1.1 Enfield Council is currently preparing a new Local Plan. Once adopted the policies and proposals within the plan will guide development and help to decide on planning applications and other planning related matters during the plan period up to 2039.
- 1.2 The new Local Plan will identify how much 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 is 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 in accordance with the main Site Selection Methodology, taking into account the Public Transport Accessibility Level (PTAL) and access to local facilities and services.

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, odor, 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)¹³
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)

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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 ¹⁴	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 0HN)	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 A10, Skate Park (N9 9HW)	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)

¹⁴ 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 ¹⁵	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, it's partially within Flood Zone 3a and 3b, it's 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.

¹⁵ 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.