

Enfield Council

Traveller Local Plan
Integrated Impact
Assessment of the
Regulation 19 Submission
Plan

Final report

Prepared by LUC
September 2025

Enfield Council

Traveller Local Plan
Integrated Impact Assessment of the Regulation
19 Submission Plan

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Chapter 1

Introduction

Introduction

1.1 Enfield Council commissioned LUC in May 2023 to carry out an Integrated Impact Assessment (IIA) comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Community Safety Impact Assessment (CSIA) of the Enfield Traveller Local Plan. As explained later in this chapter, the SA/SEA, HIA, EqIA and CSIA have been undertaken together as part of the IIA. Therefore, for simplicity within this report we mostly refer just to the IIA, which should be taken as incorporating SA/SEA, HIA, EqIA and CSIA.

1.2 IIA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. IIA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

The Traveller Local Plan area

1.3 The London Borough of Enfield (LBE) lies within the north of Greater London (see **Figure 1.1**) and is home to around 333,794 people¹. The borough sits entirely within the M25, north of the River Thames. Central London is approximately 15 miles to the south. LBE shares boundaries with three other London boroughs: Waltham Forest to the east, Haringey to the south and Barnet to the west. LBE adjoins the counties of Hertfordshire and Essex to the north and east, respectively. It is also positioned within the London-Stansted-Cambridge Innovation Corridor.

1.4 LBE is faced by a significant number of planning constraints, specifically the Green Belt which covers 3,000ha (37%) of the borough, Metropolitan Open Land which covers 249ha (3%) of the borough and over 400ha (5%) of industrial land, of which approximately 326ha (4%) is classified as a Strategic Industrial Location (SIL) or Locally Significant Industrial Site (LSIS). There are also a number of environmental constraints towards the east of the borough.

Gypsy and Traveller Accommodation Assessment

1.5 The 2024 Gypsy and Traveller Accommodation Assessment (GTAA)² is an update to the 2020 Gypsy and Traveller Accommodation Needs Assessment³ and provides evidence to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople across the borough. The GTAA update includes 2021 Census data and removes reference to the 2015 Planning Policy for Traveller Sites 'nomadic habit of life' definition, as the Government reverted back to the 2012 definition following the Lisa Smith Court of Appeal judgment in 2023.

1.6 In addition to the GTAA, the Greater London Authority has commissioned a London-wide Gypsy and Traveller Accommodation Needs Assessment⁴. This study is currently underway, with findings expected to be published later in 2025. The needs identified in the London-wide assessment are expected to closely align with those in Enfield's updated GTAA.

¹ Office for National Statistics (2024). Dataset: Estimates of the population for the UK, England, Wales, Scotland, and Northern Ireland. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>)

² Arc4 (2024). Gypsy and Traveller Accommodation Assessment 2024

³ Arc4 (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-Travellers-assessment-final-report-2020-planning.pdf)

⁴ Greater London Authority (2024). MD2908 London Gypsy and Traveller Accommodation Needs Assessment (see <https://www.london.gov.uk/md2908-london-gypsy-and-traveller-accommodation-needs-assessment>)

Pitch provision

1.7 As summarised in **Table 1.1**, the GTAA identifies an overall need for 30 pitches in LBE. Of these 30 pitches, evidence indicates that 16 are needed in the first five years (2020/21 to 2024/25) and 14 over the remaining period to 2040/41. Currently, there are no Gypsy and Traveller sites, or Showperson yards, in the borough.

Table 1.1 Gypsy and Traveller pitch need to 2040/41

Period	Pitch need
Five year Authorised Pitch Shortfall (2020/21 to 2024/25)	16
Longer-term need (2025/26 to 2040/41)	14
Total net shortfall 2020/21 to 2040/41	30

Transit provision

1.8 There is currently no transit site provision within the borough, but Enfield Council has a highly effective negotiated stopping policy in place. The GTAA identifies a need for land for permanent stop over locations to accommodate at least 15 caravans at one time. According to the GTAA, this could be accommodated either through a transit site or stop over location(s).

Plot provision

1.9 There is currently no Travelling Showperson provision in LBE. Although the 2008 Greater London Gypsy and Traveller Accommodation Needs Assessment⁵ identified a need for three plots over the period 2007 to 2017, Enfield Council has received no applications for plots since 2007. The Enfield GTAA has not evidenced any need for additional Travelling Showperson plots in the borough. However, it recommends that the Council should respond to any emerging need over the Traveller Local Plan period through its planning policy.

Outline of the Traveller Local Plan

1.10 Enfield Council's Traveller Local Plan will set out local planning policies and site allocations for meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople, as identified by the GTAA (above). The overarching purpose of the Traveller Local Plan is to help Enfield Council meet the future accommodation needs of this community and deal with issues relating to the location of sites, their size, the type of accommodation, tenure, management and design.

1.11 For the purposes of this IIA, any reference to 'Travellers' encompasses the following:

- Gypsies (including Roma) and Travellers; and
- Travelling Showpeople.

1.12 The production of the Traveller Local Plan will ensure that the Council provides a sufficient supply of good quality sites for Travellers, which in turn will help address the inequalities that Travellers experience. The Traveller Local Plan will also help to reduce the number of unauthorised sites and encampments, which can be a source of tension between travelling and settled communities.

1.13 The Regulation 19 Submission Plan contains the following two policies:

- Policy TLP1: Sites for Travellers; and
- Policy TLP2: Design and Site Layout.

⁵ Fordham Research (2008). London Boroughs' Gypsy and Traveller Accommodation Needs Assessment. (see https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf)

1.14 A summary of the sites allocated by the Regulation 19 Submission Plan and the needs that they address is provided **Table 1.2**. Chase Park (TLP_10) or Crews Hill (TLP_11) are allocated to meet the long-term need.

Table 1.2 Summary of sites allocated and needs addressed by the Traveller Local Plan

Site name (ID number)	Proposed use	Required capacity
Bulls Cross Nursery (TLP_01)	Permanent provision (first 5 years)	Minimum of 8 pitches
Land adjacent to Ridgeway (TLP_03)	Permanent provision (first 5 years)	Minimum of 12 pitches
Land at A10 (TLP_09)	Transit provision	Minimum of 15 caravans
Chase Park (TLP_10) or Crews Hill (TLP_11) ⁶	Permanent provision (in the period 2032/33 – 2040/41)	Minimum of 10 pitches

1.15 In addition to producing the Traveller Local Plan, Enfield Council's Local Plan is at Examination. The emerging Local Plan covers the period 2019 to 2041 and contains a policy (Policy H10: Traveller Accommodation) acknowledging the commitment to produce the Traveller Local Plan. Once published, the Traveller Local Plan will form part of the Development Plan for Enfield, as further described in **Chapter 2**.

Sustainability Appraisal and Strategic Environmental Assessment

1.16 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Local Plan documents. For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA Regulations remain in force, and it is a legal requirement for Enfield's Traveller Local Plan to be subject to SA and SEA throughout its preparation.

1.17 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the Government's Planning Practice Guidance⁷), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA/SEA process – this is the process that is being undertaken for Enfield's Traveller Local Plan, and within this report the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'. In addition to SA/SEA, further impact assessments are being carried out on the Traveller Local Plan as described below, therefore, instead of 'SA' and 'Sustainability Appraisal', the term 'IIA' and 'Integrated Impact Assessment' are being used in this report.

1.18 The IIA process comprises a number of stages, as shown below.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the SA (or 'IIA') Report.

Stage D: Consulting on the Local Plan and the SA (IIA) Report.

⁶ The longer-term need for permanent pitches (in the period 2032/33-2040/41) will be met within either the Chase Park placemaking area or the Crews Hill placemaking area. The masterplans for these areas, (to be prepared in accordance with ELP Policies PL10 and PL11), must each include a site for 10 permanent pitches. The Council will then make a decision on which placemaking area will deliver the remaining permanent pitch requirement, taking into account matters including viability, likely delivery timeframes and any new evidence on the locational needs of the Enfield traveller community.

⁷ Ministry of Housing, Communities & Local Government (MHCLG) (2020). Guidance: Strategic environmental assessment and sustainability appraisal. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)

Stage E: Monitoring the significant effects of implementing the Local Plan.

Health Impact Assessment

1.19 Although not a statutory requirement, Health Impact Assessment aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues have been included as part of the IIA process and in this way the HIA of the Traveller Local Plan is being carried out as part of the IIA. Recommendations will be made in relation to how the health-related impacts of the Traveller Local Plan can be optimised as the options are developed into detailed policies and site allocations.

Equalities Impact Assessment

1.20 The requirement to undertake formal Equalities Impact Assessment of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

1.21 In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA is being carried out as part of the IIA, setting out how the Traveller Local Plan is likely to be compatible or incompatible with the requirements of the Equalities Act 2010.

1.22 In addition to incorporating EqIA within this IIA, Enfield Council has produced a separate standalone EqIA that incorporates the findings of the IIA.

Community Safety Impact Assessment

1.23 The purpose of the Community Safety Impact Assessment will be to ensure that the Traveller Local Plan's vision, objectives, policies and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.

1.24 The CSIA will be undertaken in accordance with the requirements of the Crime and Disorder Act 1998 and the Police and Justice Act 2006, as amended, and will fulfil the requirement to carry out a review of the levels and patterns of crime, disorder and community safety in the area when developing a strategy or plan.

Habitats Regulations Assessment

1.25 The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007⁸. The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)⁹ (hereafter referred to as the 'Habitats Regulations'). When preparing the Traveller Local Plan, the Council is therefore required by law to carry out an HRA, and because it is a separate legal requirement to the IIA, it is being undertaken and reported separately from the IIA.

1.26 The purpose of the HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. The Council can commission consultants to undertake HRA work on its behalf and the work documented in separate HRA reports is then sent to and considered by the Council as the 'competent authority'. The Council will consider the HRA and may only progress the Traveller Local Plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are

⁸ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London

⁹ The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London

identified. The requirement for authorities to comply with the Habitats Regulations when preparing a plan is also noted in the Government's online Planning Practice Guidance (PPG)¹⁰.

1.27 The HRA findings have been considered in the IIA where relevant, for example to inform judgements about the likely effects of potential site locations on biodiversity.

Meeting the requirements of the SEA Regulations

1.28 **Table 1.3** signposts the relevant sections of the IIA Report that are considered to meet the SEA Regulations requirements.

1.29 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the IIA process as and when data are published.

Table 1.3 Meeting the requirements of the SEA Regulations

SEA Regulations requirements	Where covered in this report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapters 1 and 3, and Appendix B
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix C
c. The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix C
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix C
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 3 and Appendix B
f. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Chapters 4, 5 and 6, and Appendix D
g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapters 4, 5, 6 and 8, and Appendix D

¹⁰ MHCLG (2019). Guidance: Appropriate assessment. (see <https://www.gov.uk/guidance/appropriate-assessment>)

SEA Regulations requirements	Where covered in this report
h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 2, and Appendix F
i. A description of measures envisaged concerning monitoring in accordance with Reg. 17.	Chapter 7
j. A non-technical summary of the information provided under the above headings.	A separate non-technical summary has been prepared to accompany this IIA Report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).	Addressed throughout this IIA Report.
Consultation requirements	
<ul style="list-style-type: none"> ■ Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)). 	Consultation on the IIA Scoping Report was undertaken in September to November 2023.
<ul style="list-style-type: none"> ■ Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13). 	Consultation is scheduled to be undertaken between September and November 2025.
<ul style="list-style-type: none"> ■ Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14). 	Not required as the Traveller Local Plan is not likely to have significant effects beyond the UK.
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)	
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and ■ the measures decided concerning monitoring. 	To be addressed after the Traveller Local Plan is adopted.
Monitoring of the significant environmental effects of the plan's or programme's	Requirement will be met

SEA Regulations requirements	Where covered in this report
implementation (Reg. 17).	after adoption of the Traveller Local Plan.
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.	This report has been produced in line with current guidance and good practice for SA/SEA and this table demonstrates where the requirements of the SEA Regulations have been met.

Structure of the IIA Report

1.30 This chapter has described the background to the production of the Enfield Traveller Local Plan as well as its contents and the requirement to undertake SA and other assessment processes. The remainder of this IIA Report is structured into the following chapters:

- **Chapter 2** describes the approach that is being taken to the IIA of the Traveller Local Plan.
- **Chapter 3** describes the relationship between the Traveller Local Plan and any other relevant plans, policies and programmes; summarises the environmental, social and economic characteristics of the borough; identifies the key sustainability issues and presents the framework of objectives against which the plan has been assessed.
- **Chapter 4** presents the IIA findings of the reasonable alternative site options.
- **Chapter 5** presents the IIA findings of the Traveller Local Plan policies.
- **Chapter 6** describes the potential cumulative effects of the Traveller Local Plan.
- **Chapter 7** suggests a potential monitoring framework and indicators that could be used to monitor implementation of the Traveller Local Plan.
- **Chapter 8** sets out the conclusions and next steps for the IIA process.

1.31 A separate volume of appendices has also been prepared as follows:

- **Appendix A** presents the consultation comments received on the August 2024 IIA Report and the July 2023 IIA Scoping and Initial Options Appraisal Report, and provides a response to each.
- **Appendix B** presents the updated review of plans, policies and programmes.
- **Appendix C** presents the updated baseline information for the borough.
- **Appendix D** presents the findings of the initial options appraisal undertaken as part of the July 2023 IIA Scoping and Initial Options Appraisal.
- **Appendix E** sets out the assumptions used in determining significant effects for the site options.
- **Appendix F** produced by the Council, presents their reasons for allocating some sites and not others.

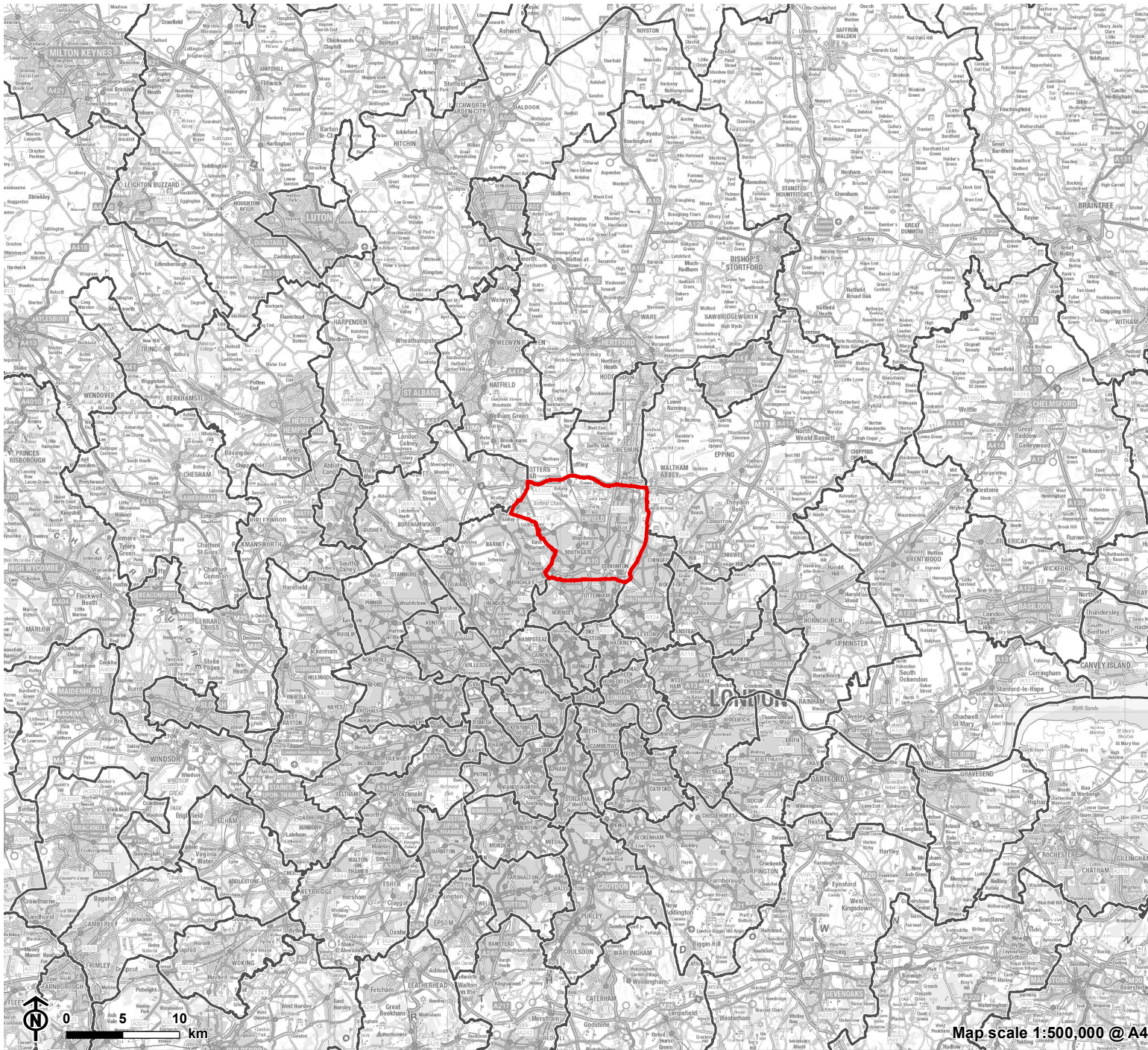


Figure 1.1: London Borough of Enfield

- London Borough of Enfield boundary
- Other local authority boundary

Chapter 2 Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the IIA of the Traveller Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's PPG. This calls for the IIA to be carried out as an integral part of the plan-making process and **Figure 2.1** sets out the main stages of the plan-making process and shows how these correspond to the SA/SEA (in this case IIA) process.

Figure 2.1 Corresponding stages in plan-making and SA/SEA (IIA)

Local Plan Step 1: Evidence Gathering and Engagement
SA/IIA Stages and Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope <ol style="list-style-type: none"> 1. Identifying other relevant policies, plans and programmes, and sustainability objectives 2. Collecting baseline information 3. Identifying sustainability issues and problems 4. Developing the SA/IIA framework 5. Consulting on the scope of the SA/IIA
Local Plan Step 2: Production
SA/IIA Stages and Tasks
Stage B: Developing and refining options and assessing effects <ol style="list-style-type: none"> 1. Testing the Local Plan objectives against the SA/IIA framework 2. Developing the Local Plan options 3. Evaluating the effects of the Local Plan 4. Considering ways of mitigating adverse effects and maximising beneficial effects 5. Proposing measures to monitor the significant effects of implementing the Local Plan
Stage C: Preparing the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Preparing the SA/IIA Report
Stage D: Seek representations on the Local Plan and the Sustainability Appraisal (or IIA) Report <ol style="list-style-type: none"> 1. Public participation on Local Plan and the SA/IIA Report 2. (i) Appraising significant changes
Local Plan Step 3: Examination
SA/IIA Stages and Tasks
Stage D (cont.) <ol style="list-style-type: none"> 2. (ii) Appraising significant changes resulting from representations

Local Plan Step 4 & 5: Adoption and Monitoring
SA/IIA Stages and Tasks
<p>Stage D (cont.)</p> <p>3. Making decisions and providing information</p>
<p>Stage E: Monitoring the significant effects of implementing the Local Plan</p> <p>1. Finalising aims and methods for monitoring</p> <p>2. Responding to adverse effects</p>

Stage A: Scoping

2.2 The IIA process began with the production of an IIA Scoping Report, also referred to as the 'Scoping and Initial Options Appraisal', for the Traveller Local Plan. The Scoping stage of the IIA involves understanding the environmental, social and economic baseline for the plan area, as well as the sustainability policy context and key sustainability issues.

2.3 There were five tasks involved in the IIA Scoping stage.

- Stage A1: Setting out the policy context for the IIA of Enfield Council's Traveller Local Plan (key government policies and strategies that influence what the Traveller Local Plan and IIA need to consider).
- Stage A2: Setting out the baseline for the IIA of the Traveller Local Plan, the current and likely future environmental, social and economic conditions in the borough.
- Stage A3: Drawing on A1 and A2, identify the sustainability problems and/or opportunities ('issues') that the Traveller Local Plan and IIA should address.
- Stage A4: Drawing on A1, A2 and A3, develop a framework of IIA objectives and assessment criteria to guide appraisal of the constituent parts of the Traveller Local Plan in isolation and in combination.
- Stage A5: Consulting on the scope of the IIA.

2.4 The Scoping and Initial Options Appraisal Report fulfilled the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Traveller Local Plan in isolation and in combination. In accordance with PPG, the report aimed to be proportionate and relevant to Enfield's Traveller Local Plan, focussing on what is needed to identify and assess the likely significant effects.

Review plans, policies and programmes to establish policy context

2.5 The Traveller Local Plan is not prepared in isolation; rather it is prepared within the context of other plans, policies and programmes. The SEA Regulations require the environmental report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support attainment of sustainability objectives that have been established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.

2.6 The July 2023 IIA Scoping Report contained a review of relevant plans, policies and programmes that were considered to be relevant to the scope of the Traveller Local Plan. The review of relevant plans, policies and programmes has since been updated and is presented in **Appendix B** of this IIA Report. A summary of the relevant international, national and sub-national level policies, plans and programmes is provided in **Chapter 3**.

Collect baseline information to establish sustainability context

2.7 The SEA Regulations require the environmental report (in this case the IIA report) to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan.

2.8 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation. Baseline information can also be

combined with an understanding of drivers of change that are likely to persist regardless of the plan to understand, in this instance, the likely future sustainability conditions in the absence of the Traveller Local Plan. An understanding of this likely future, together with the assessed effects of the Traveller Local Plan itself, additionally allows the IIA to report on cumulative effects, another requirement of the SEA Regulations.

2.9 The SEA Regulations require assessment of effects in relation to the following 'SEA topics': biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics and additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA/SEA and other impact assessment processes.

2.10 Baseline information for the borough and its likely evolution without the Traveller Local Plan was presented in the IIA Scoping Report. Any updates since publication of the July 2023 IIA Scoping Report have been reflected in **Appendix C** of this IIA Report, with a summary provided in **Chapter 3**.

Identify sustainability issues

2.11 The baseline information and policy context also allow the identification of sustainability issues, including problems as required by the SEA Regulations. The sustainability issues were initially presented in the IIA Scoping Report but have since been updated and are presented in **Chapter 3** of this IIA Report.

Develop the IIA framework

2.12 The IIA framework for the Traveller Local Plan is based on the IIA framework used to appraise Enfield's Local Plan. However, it was revised as part of the IIA Scoping Report (July 2023) following the analysis of international, national and county level plans and programmes, the baseline information, and the key sustainability issues identified for Traveller communities in the plan area.

2.13 Development of an assessment framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. An explanation of the development of the IIA framework for the Enfield Local Plan is provided further ahead in this chapter and the IIA framework is presented in **Table 3.2**.

Consult on the scope and level of detail of the IIA

2.14 Public and stakeholder participation is an important part of the IIA and wider plan-making processes. It helps to ensure that the IIA report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.15 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted "*when deciding on the scope and level of detail of the information that must be included*" in the IIA report. The scope and level of detail of the IIA is governed by the IIA framework, and the statutory consultees together with members of the public were consulted on this information as part of the consultation on the IIA Scoping Report from September to November 2023.

2.16 Some amendments were made to the review of policies, plans and programmes, baseline information and the IIA framework following consultation on the IIA Scoping Report.

Stage B: Developing and refining options and assessing effects

2.17 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA help to identify where there may be 'reasonable alternatives' to the options being considered for a plan.

2.18 In relation to the IIA report that needs to be prepared for the Enfield Traveller Local Plan, Part 3 of the SEA Regulations 12 (2) requires that:

“The report shall identify, describe and evaluate the likely significant effects on the environment of—

- (a) implementing the plan or programme; and
- (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”

2.19 Schedule 2 (8) of the SEA Regulations requires that the environmental report (i.e. SA/IIA report) includes:

“8. An outline of the reasons for selecting the alternatives dealt with....”

2.20 The SEA Regulations therefore require that when considering the policies and site allocations for inclusion in a plan, any alternative policy approaches or site options that are ‘reasonable’ must be subject to appraisal. Therefore, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site allocation options that are unavailable or undeliverable.

2.21 The IIA findings are not the only factors taken into account when plan-makers are determining a preferred option to take forward in a plan. There will often be an equal number of positive and negative effects identified by the IIA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for the plan.

2.22 The consideration of reasonable alternatives has been a key focus of attention within the IIA process. This section provides an overview of how policy and site options have been identified by Enfield Council, which ones are reasonable alternatives and therefore have been subject to IIA, and how this appraisal work has fed into the development of Enfield’s Traveller Local Plan.

Issues and Options Traveller Local Plan (Regulation 18)

2.23 In September to November 2023, Enfield Council consulted on an Issues and Options Traveller Local Plan (September 2023). Much of the Issues and Options Traveller Local Plan was of an opinion-seeking nature, asking open-ended questions about future policy directions so as to obtain views from the community and stakeholders on the issues and options identified, to see if there were additional issues and options, and to help identify the preferred options. Given the nature of the document, much of it was not amenable to assessment. However, where clear preferred policy directions and alternatives were described or implied by certain elements of the document, these were subjected to IIA. These options are summarised below.

■ Chapter 3: Traveller Local Plan Aims and Objectives

- The aims; and
- The objectives.

■ Chapter 4: Traveller Local Plan Issues and Options

- Options for number of pitches to be provided (Q7);
- Policy options for delivering the identified need (table preceding Q9);
- Whether to allocate a larger number of smaller sites or vice versa (Q12-13);
- Whether or not to include a rural exception sites policy (Q14);
- Options for ownership and management of sites (table preceding Q15);
- Whether or not to include a design policy (Q14); and
- Whether or not to provide for a transit site / stop over site (Q17).

2.24 These options and their alternatives were derived by Enfield Council from the Gypsy and Traveller Accommodation Needs Assessment 2024, which in addition to setting out the accommodation needs of Travellers across the borough, also set out some wider issues. These issues arose during the stakeholder consultation exercise undertaken as part of the study, which

involved telephone interviews with Travellers and council officers in neighbouring local authorities and advocacy groups. Enfield Council explored the issues raised to identify how, where and when need should be addressed, while also using Planning Policy for Traveller Sites (2015) to inform their choice of options. Enfield Council undertook due diligence to ensure they had considered all of the relevant options by reviewing similar Issues and Options Traveller Local Plans from other local planning authorities. Finally, they sought views internally from appropriate officers on their draft document, in addition to sharing it with the Gypsy, Roma, Traveller, Boater and Showman Project Board¹¹. This enabled them to finalise the various options prior to consultation.

2.25 IIA of the options listed above was undertaken in 2023 and documented in the July 2023 IIA: Scoping and Initial Options Appraisal Report. Likely significant effects, both positive and negative, were identified as far as was possible at this early stage of the IIA (cumulative effects, for example, are more able to be assessed once decisions have been made about which combinations of options to take forward). The IIA findings for the options are reproduced in **Appendix D** of this report along with the recommendations that were made for mitigating potential negative effects and maximising potential benefits of the Traveller Local Plan.

2.26 The options were appraised against the IIA framework, with symbols being attributed to each option to indicate their likely effects on each IIA objective as shown in **Figure 2.2**. Development of an assessment framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. An explanation of the development of the IIA framework for the Traveller Local Plan is provided further ahead under 'Appraisal methodology'.

Draft Traveller Local Plan (Regulation 18)

2.27 In September to November 2024, Enfield Council consulted on a Draft Traveller Local Plan (September 2024). This Draft Traveller Local Plan was the next stage of development of the Issues and Options Traveller Local Plan and was informed by the consultation comments received on the Issues and Options Traveller Local Plan. It proposed site allocations and draft policies to meet the identified needs of the Traveller communities in the borough.

2.28 The August 2024 IIA Report that accompanied the Draft Traveller Local Plan has since been updated to provide an appraisal of, and accompany, the Regulation 19 Submission Plan (see below). The Regulation 18 policy appraisals have not been re-presented in this IIA Report, as they represent earlier versions of the Regulation 19 policies rather than reasonable alternatives to them. They can instead be found in the August 2024 IIA Report.

Regulation 19 Submission Plan

2.29 Enfield Council is now consulting upon the Regulation 19 Submission Plan, which is the subject of this IIA Report. The Submission Plan will be the version of the Local Plan submitted to the Planning Inspectorate for Examination on behalf of the Secretary of State.

2.30 The Submission Plan contains the Council's proposed policies. It has been prepared to be consistent with the National Planning Policy Framework (NPPF) and takes into account the PPG. Once adopted, the Traveller Local Plan will form part of the Development Plan for Enfield.

Site options

2.31 This section of the summarises the approach taken by the Council to identifying sites for meeting the Borough's Gypsy and Traveller accommodation, as detailed in its Site Selection Topic Paper¹². It also sets out which of these sites were considered reasonable alternatives for the purposes of the IIA.

¹¹ The purpose of the Gypsy, Roma, Traveller, Boater and Showman Project Board is to bring together a cross-section of the community, including professionals, Gypsy, Roma, Traveller, Boater and Showman (GRTBS) advocates, and GRTBS members, to proactively support GRTBS residents in Enfield. The focus of the Board is to: (1) improve the quality of health; (2) improve education; (3) improve housing; and (4) enhance community development initiatives.

¹² Enfield Council (2025) Site Selection Topic Paper

Call for Sites

2.32 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. 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). A further Call for Sites was undertaken in September 2024. No new sites were submitted during this process.

Duty to co-operate

2.33 In August 2021, as part of the ELP process, Duty to Cooperate letters were issued which expressly sought to discuss Traveller pitch needs. All seven neighbouring authorities responded in 2021, confirming that they were unable to assist with Enfield's unmet housing needs. Further rounds of correspondence sent to all seven neighbouring authorities, as well as to selected Housing Market Area link authorities, prescribed bodies, and relevant interest groups also failed to identify neighbouring authorities that could help meet Enfield's identified Gypsy and Traveller accommodation needs.

Comprehensive review of LBE-owned sites

2.34 At the Issues and Options stage, two LBE-owned 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. The Council's Property Services department therefore reviewed their entire property portfolio in early 2024 to determine whether any additional sites could be identified and formally submitted to the Local Planning Authority for consideration. This identified a further seven sites that were formally submitted to the Local Planning Authority for assessment, bringing the total to nine sites.

Placemaking areas

2.35 The consideration of the placemaking areas arose as a direct result of responses at the Issues and Options Stage. Responses showed that there were two preferred approaches: the allocation of small sites as well as providing pitches as part of a large housing site. The Draft TLP considered two strategic rural placemaking areas (Chase Park and Crews Hill, proposed for allocation for a range of uses in the emerging Local Plan via Policies PL10 and PL11) as broad locations for Traveller provision. Responses to the Draft TLP queried why not all placemaking areas were considered to be reasonable alternatives and assessed through the IIA. To further clarify the position on the placemaking areas, an assessment was undertaken by the Council to determine whether they could also be reasonable alternatives for Gypsy and Traveller provision. The conclusions from this work are detailed in the Council's Site Selection Topic Paper¹³. In summary, 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

2.36 The Council's Traveller Local Plan Site Selection Topic Paper details the position on the HELAA sites. 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

¹³ Enfield Council (2025). Site Selection Topic Paper

of other sites being available for meeting Traveller accommodation needs, over and above the nine sites submitted by the Council's Property Services department. While 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. The nine sites submitted by Council's Property Services department plus the two placemaking areas assessed by the Council for Traveller provision are listed in **Table 2.1**.

Table 2.1 Sites assessed for Traveller provision by Enfield Council

Site Reference	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)	Brimsdown	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)
TLP_11	Crews Hill	Whitewebbs / Ridgeway	ELP Place Making area (Policy 11)

2.37 Nine of the eleven identified sites were considered reasonable alternatives for the IIA. The sites that were not subject to IIA were:

- TLP_02, Durant's Park Bowling Green as the site is no longer considered available (N.B. the site was appraised at an earlier stage of the IIA when the IIA team was unaware that it was not available).
- TLP_06 Dove Lane, which the Council own. This is due to the fact site TLP_06 is located outside of the boundary of LBE and Enfield Council cannot allocate a site within a neighbouring authority.

2.38 Enfield Council's Traveller Local Plan Site Selection Topic Paper¹⁴ outlines the approach Enfield Council took to assess the potential suitability for allocation of the site options identified above. **Appendix F** to the IIA summarises the stages of the Site Selection Methodology and the Council's reasons for selecting or rejecting each of the site options for allocation.

¹⁴ Enfield Council (2025). Site Selection Topic Paper

Policy options

2.39 Drawing on the policy options included in the Issues and Options Traveller Local Plan, the IIA findings for those options, the consultation responses received and the current national and London level planning context, the Council drafted the following two policies:

- Policy TLP1: Sites for Travellers; and
- Policy TLP2: Design and Site Layout.

2.40 An appraisal of these two policies is provided in **Chapter 5** of this IIA Report.

Stage C: Preparing the IIA report

2.41 This IIA Report describes the process that has been undertaken to date in carrying out the IIA of the Enfield Traveller Local Plan. It contains an appraisal of all reasonable alternative site options and policies. The focus of the appraisal has been the identification of significant effects, whether positive or negative, in accordance with the SEA Regulations.

Stage D: Consultation on the Traveller Local Plan and this IIA Report

2.42 The Traveller Local Plan has been consulted upon at each stage of its development, alongside the IIA. **Appendix A** of this document presents the consultation comments received in relation to the August 2024 IIA Report and the July 2023 IIA Scoping and Initial Options Appraisal Report, and provides a response to each of them.

2.43 Enfield Council is now inviting soundness representations on the Regulation 19 Submission Plan and this accompanying IIA Report. These documents are being published on the Council's website for consultation in September 2025.

Stage E: Monitoring and implementation of the Traveller Local Plan

2.44 Chapter 7 sets out suggested measures for monitoring potentially significant sustainability effects that could arise as a result of implementing the Enfield Traveller Local Plan.

Appraisal methodology

2.45 The SEA Regulations, Schedule 2 (8) require the environmental report to include:

“...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

IIA framework

2.46 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan and reasonable alternatives can be described, analysed and compared. The IIA framework comprises a series of sustainability, health, equalities and community safety objectives against which the performance of the Traveller Local Plan and reasonable alternatives is assessed. Each IIA objective is supported by a set of appraisal questions, which help to guide judgements on whether a particular element of the plan is likely to help the achievement of the objective in question. The appraisal questions are included for guidance only and are not intended to be definitive or exhaustive.

2.47 The IIA framework for the Traveller Local Plan is presented in **Table 3.2** and is based on the IIA framework used to appraise Enfield's Local Plan. The IIA objectives and accompanying questions were subject to change, following feedback collated during consultation on the Scoping and Initial Options Appraisal Report, including with the three statutory consultees (Environment Agency, Historic England and Natural England) under Regulation 12 (5) of the SEA Regulations, and other stakeholders.

2.48 Table 3.1 outlines the key sustainability issues facing the plan area, the potential for the Traveller Local Plan to address them, and how this is reflected in the IIA objectives. The relationship between the 'SEA topics' that SEA is required to cover, as

per Schedule 2 of the SEA Regulations, is shown in the final column of **Table 3.2**. It can be seen that a number of the IIA objectives cut across SEA topics, showing how inter-related many of these are.

Key to IIA effects symbols

2.49 The findings of the IIA are presented as colour coded symbols showing the significance of the likely effect of each policy or site in relation to each IIA objective, along with a concise justification for the effect identified, where appropriate. The colour coding is shown in **Figure 2.2** below.

Figure 2.2 Key to IIA effects symbols

++	Significant positive effect
++/-	Mixed significant positive and minor negative effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
--/+	Mixed significant negative and minor positive effect
--	Significant negative effect
++/--	Mixed significant positive and significant negative effect
+/-	Mixed minor positive and minor negative effect
?	Uncertain effect
N/A	Not applicable

2.50 Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? or -?) and the symbol colour coded as per the potential positive, negligible or negative effect (e.g. green, white, orange/red, etc.). Negligible effects were recorded where a policy or site allocation was considered to have no effect in contributing to achievement of the IIA objective. This is usually the case when an objective or policy is focused on a very narrow topic and would only affect achievement of two or three IIA objectives. For site options, negligible effects are usually identified when the location of a site would not affect achievement of an IIA objective (e.g. IIA2: Climate change adaptation), as this would depend on the design measures required in policies.

2.51 The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy in relation to the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, effects are relative to the scale of proposals under consideration.

2.52 Mixed effects have only been presented where directly opposing effects (i.e. positive and negative) have been identified through the appraisal (e.g. +/-, ++/-, --/+ and ++/--). For some IIA objectives, it is possible that a policy might have a minor positive effect in relation to one aspect of the policy and a significant positive effect in relation to another aspect (giving a score of +/+++). However, in these instances, only the significant effect is shown in the appraisal tables to aid clarity and reflect the fact that the focus of IIA is on identifying significant effects. Similarly, if a policy could have a minor and significant negative effect (-/-) for the same IIA objective, only the significant negative effect is shown in the appraisal tables. The justification text relating to the appraisal describes where the various elements of the policy or site being appraised might have potential to result in effects of differing magnitude.

2.53 The likely sustainability effects of the Regulation 19 Submission Plan are presented in **Chapters 4** and **5**, while an assessment of the potential cumulative impacts of the Submission Plan are presented in **Chapter 6**.

Approach to appraisal of site allocation options

2.54 Each site option has been appraised on its own merits on a 'policy-off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental receptors within the site boundary. This has served to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. It has also provided a more consistent basis for assessment than reliance on indicative site masterplans or offers of infrastructure provision, because this information was not available for all site options. Consideration by the IIA of any proposed site layouts would also be inappropriately detailed in light of the relatively high-level nature of a Traveller Local Plan. The findings of the policy-off appraisals are set out in **Chapter 4**.

2.55 Once the Traveller Local Plan site allocation policies were drafted, the site assessment scores were revised to reflect the Traveller Local Plan's site-specific policy requirements. The IIA findings for the site allocation policy (Policy TLP1: Sites for Travellers) are set out in **Chapter 5**. In addition, once a complete draft of the Traveller Local Plan had been produced, the effects of the plan as a whole were appraised and consideration also given to the potential for these to combine with policies and regulatory mechanisms external to the plan – see **Chapter 6**: Cumulative effects.

Criteria used to assess site options

2.56 IIA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, for each of the IIA objectives in the IIA framework, a clear set of decision-making criteria and assumptions for determining significance of the effects was developed. These assumptions set out clear parameters within which certain IIA effects would be identified, based on factors such as the distance of site options from sensitive environmental receptors (e.g. designated biodiversity sites or areas of high landscape sensitivity) or key services and facilities (e.g. public transport links). The criteria and assumptions are presented in **Table E.1 of Appendix E**. They are based on the criteria and assumptions used to appraise all reasonable alternative site options in Enfield's emerging Local Plan. However, some criteria were removed as they were not relevant to the Traveller Local Plan, or alternatively revised to align with Enfield's Council's site selection methodology. The changes are outlined below.

- Criterion 3a was renamed 'Pitch provision' and the capacities updated, as the Local Plan criterion threshold of ≥ 100 housing units for major positive effects is not appropriate in the context of a need for 30 pitches in total over the Traveller Local Plan period (including an immediate need for 16 pitches from existing households), as set out in the GTAA. The new assumptions outlined below are based on the fact the 2020 GTAA reports that it is generally accepted amongst the travelling community that sites of six to ten pitches are appropriate.
 - Major positive if site has capacity for six pitches or more.
 - Minor positive if site has capacity for less than six pitches.
- IIA objective 3 'Housing' was renamed 'Pitches' to reflect the nature of the Traveller Local Plan.
- Criterion *4c Loss of recreation* was amended so that only when a site contains an existing open space (and not green loops, green links, walking or cycling paths) does it receive a major negative effect. This is due to the scale of development and the fact it is unlikely to prevent access to green loops, green links, walking and cycling paths.
- An additional criterion, *4d Acoustic privacy*, was added under IIA objective 4 to make use of Enfield's detailed site assessment in relation to the noise environment for site occupiers. This reflects that caravans are likely to have poor sound insulation compared to bricks and mortar houses and the requirements of the national Planning Policy for Traveller Sites 2024. It contains the following assumptions:
 - Major negative effect if Enfield Council's site assessment concludes that there is a major noise issue on or close to site requiring mitigation before the site can be used.
 - Minor negative effect if Enfield Council's site assessment concludes that there is a noise issue near the site which may require mitigation.
 - Negligible effect if Enfield Council's site assessment concludes that there is no noise issue or existing acoustic barriers.
- Criterion 6a was renamed 'Social inclusion' and replaced with the following assumptions:

- Minor positive effect if site is within an existing or planned new community.
- Minor negative effect if site is not within an existing or planned new community.
- Criterion *15b Open space* was amended so that only when a site contains an existing open space (and not green loops, green links, walking or cycling paths) does it receive a major negative effect. This is due to the scale of development and the fact it is unlikely to prevent access to green loops, green links, walking and cycling paths.
- Criterion *16a Brownfield/greenfield land* was updated, as the Local Plan criterion threshold of ≥ 3 ha brownfield for major positive is not appropriate in the context of a four pitch site being approximately 0.2ha in size per the Council's site selection methodology. The new assumptions are outlined below and reflect Stage 3b of the site selection methodology which includes an officer assessment of whether the site contains existing development or not.
 - Major positive if there are buildings on site that can possibly be converted for Gypsy and Traveller use.
 - Minor negative if there are no buildings on site.
- The assumptions for criterion *17a Flood Zones* were updated so that if 25% or more of a site is within Flood Zones 2 or 3, it receives a major negative effect. This is to address concerns raised by the Environment Agency on the vulnerability of Traveller sites to flood risk, which are classed as 'Highly vulnerable' in the Government's Planning Practice Guidance.
 - At Regulation 19 stage, the wording for criterion *17b Surface water flood risk* was amended to reflect new surface water flood risk data released by the Environment Agency.

2.57 The site options appraisals were subject to a number of difficulties and limitations, as set out in the 'Difficulties encountered' section below.

Significance scoring

2.58 In many cases, a number of different criteria were used to inform the significance of the likely effect of site options on an IIA objective. The rules used to consolidate scores against multiple criteria into a single significance effect are set out in the final column of **Table E.1** of **Appendix E**.

2.59 For each IIA objective, one of two approaches were adopted. The first approach was to assign numerical scores for each criterion as follows:

- A major positive effect was given +3
- A minor positive effect was given +1
- A negligible effect was given 0
- A minor negative effect was given -1
- A major negative effect was given -3

2.60 The scores for the individual criteria were then totalled and averaged. A significance score was then assigned based on this average as follows:

- If the average score was $\geq +2$ a significant positive score was identified (++)
- If the average score was >0 to <2 a minor positive score was identified (+)
- If the average score was 0 a negligible score was identified (0)
- If the average score was <0 to >-2 a minor negative score was identified (-)
- If the average score was ≤ -2 a significant negative score was identified (--)

2.61 The second approach for some IIA objectives, primarily ones relating to the environment, was to take a more precautionary approach and identify a significant negative score in relation to the IIA objective if the effect against any single criterion was major negative rather than averaging scores.

Assumptions regarding distances

2.62 In assessing the likely accessibility of site options to key services and facilities, reference is made to various distances in the site assessment assumptions. The most sustainable and easily achievable mode of transport is walking and the distances therefore refer to walking distances to these services and facilities. These were based on the suggested acceptable walking distances presented in relevant guidance¹⁵. However, some distance thresholds were refined using professional judgment to reflect the fact that people are likely to be willing to walk longer distances to access higher order services (for example a secondary school rather than a primary school). It cannot be known which walking route future residents of a site will take and this is likely to vary depending on the exact starting point of each individual's journey within a site, especially where sites are large. Therefore, for consistency and to avoid spurious accuracy, these distance thresholds were applied using straight-line measurements from the boundary of a site option to the services and facilities in question.

Difficulties encountered

2.63 It is a requirement of the SEA Regulations that when describing how the assessment was undertaken, this includes any difficulties (such as technical deficiencies or lack of knowhow) encountered in compiling the required information. Such difficulties are described here.

- The number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies means that it would not be proportionate or practicable for the IIA to consider every potentially relevant document when establishing the policy context and baseline conditions (see **Chapter 3** and **Appendices B** and **C**). Instead, the IIA sought to identify the key information relevant to the preparation of the Enfield Traveller Local Plan and IIA.
- Because many effects of development will be dependent on the exact location, layout and design of development, it may be possible to mitigate some of the effects highlighted in this IIA. However, given the inherent uncertainties about these details at the plan-making stage of the planning process, the IIA focuses on identifying potential significant effects of the options considered, without making assumptions about detailed design or mitigation measures that might be implemented.
- Appraisal scores relying on intersection with areas of environmental sensitivity such as flood zones or areas of ecological value were not based on the proportion of the site intersecting with the sensitive area. As such the assessment scores were designed to highlight potential adverse effects and flag these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation. Therefore, where a site receives a negative effect, this may have been as a result of only a small part of the site falling within the environmentally sensitive area.
- Distance thresholds applied in considering accessibility of sites to key services and facilities used straight-line measurements rather than actual walking routes for the reasons set out in the site assessment criteria and assumptions section above.
- Site option appraisals identified positive effects where sites were within walking distance of key services and facilities. It was not considered proportionate for appraisal at the plan-making stage of the planning process to consider whether capacity exists at individual social infrastructure facilities (e.g. schools and GP surgeries) to accommodate demand from those developments. It was assumed that the need for additional capacity would be considered via the Council's infrastructure development plan process and developer contributions to additional capacity gathered as appropriate.
- GIS data used to inform the assessment was generally only available for the extent of LBE, which could affect the IIA findings for sites on the edge of the borough.
- When considering the proximity of site options to healthcare facilities, only NHS GP surgeries were considered. This is because these are the facilities most likely to be used by local residents.

¹⁵ The Chartered Institution of Highways and Transportation (formerly referred to as the Institution of Highways and Transportation) (2000). Guidelines for Providing for Journeys on Foot. (see https://programmeofficers.co.uk/Wirral/CoreDocuments/CD3/CD03.10_CIHT%20guidelines%20for%20providing%20for%20journeys%20on%20foot%202000.pdf)

- When considering the proximity of site options to existing schools, only state schools were considered. This is because these schools are open to all and it is expected the majority of school age residents will attend state schools. In addition, local catchments may not apply to independent schools, for which pupils will often travel further.
- The acceptable level of development and change in landscape terms identified for different areas of the borough by the Council's 'Character of Growth' study formed the basis of appraisal of most site options in relation to IIA objective 15: Landscape and townscape. However, this study did not cover the entire borough (most of the Green Belt and open space was excluded from the study scope). Therefore where site options fell into these areas, the IIA fell back on the more simplistic assessment method used at Regulation 18 stage, as outlined below.
 - Sites that are located within a settlement and contain built development would have a minor positive (+?) effect on the townscape, although this is uncertain.
 - Sites that are located within a settlement but do not contain built development and/or sites that are not large in scale (i.e. <3ha), located on the edge of a settlement or within a relatively undeveloped area would have a minor negative (-?) effect on landscape, although this is uncertain.
 - Sites that are large in scale (i.e. >=3ha), located on the edge of a settlement or within a relatively undeveloped area would have a significant negative (--?) effect on landscape, although this is uncertain.
 - Sites that are not located near any settlements and are in rural areas, would also have a significant negative (--?) effect on landscape, although this is uncertain.
- When considering potential loss of best and most versatile agricultural land, data from the Agricultural Land Classification did not distinguish between Grade 3a (considered to be high quality) and 3b (not considered to be high quality) agricultural land.
- When considering the likely effect of site options in relation to biodiversity, it was considered disproportionate to consider the designated features of individual, locally designated biodiversity sites that may be affected. Instead, professional judgement was used to define precautionary distance thresholds within which development may have an adverse affect. Potential effects on SSSIs and European sites were able to draw on the IRZs defined by Natural England for this purpose. Two of the sites, TLP_10 (Chase Park) and TLP_11 (Crews Hill), are very large and so the exact location of pitches within these two sites is unknown at this stage. In order to acknowledge this, uncertainty was recorded against all relevant effects.

Chapter 3

Sustainability context

3.1 Schedule 2 of the SEA Regulations requires the environmental report to provide/describe:

“5. The environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.”

3.2 This chapter summarises the relationships between the Traveller Local Plan and other relevant plans and programmes. It also considers the relevant international, national and sub-national policy context which should be taken into consideration during preparation of the plan and its IIA.

Relationship with other relevant plans or programmes

3.3 The Traveller Local Plan, once published, will form part of the Development Plan for Enfield alongside the following documents:

- Enfield's new Local Plan (adoption anticipated in 2025/26);
- London Plan (2021);
- North London Waste Plan (2022); and
- any “Made” Neighbourhood Plans.

3.4 Enfield's new Local Plan and the Traveller Local Plan will replace the following documents:

- Core Strategy (2010);
- Development Management Document (2014);
- North Circular Area Action Plan (2013);
- North East Enfield Area Action Plan (2016); and
- Edmonton Leaside Area Action Plan (2020).

3.5 **Figure 3.1** shows the documents that will comprise Enfield's new Development Plan.

Figure 3.1 Enfield's emerging Development Plan



Policy context

3.6 This section sets out the policy context within which the Traveller Local Plan must operate in relation to the various sustainability themes covered by the IIA. It should be noted that the policy context within which the Traveller Local Plan and its IIA is being prepared is inherently uncertain given the following key factors:

- **Planning and Infrastructure Bill:** introduced in March 2025, the Bill aims to accelerate the delivery of housing and infrastructure development by reforming the planning system. Key proposals include streamlining approval processes, introducing a nature restoration levy and reforming compulsory purchase rules.
- **Levelling-up and Regeneration Act 2023:** the Act sets out various planning reforms including the replacement of SA/SEA with 'Environmental Outcomes Reports'; replacement of the CIL process and much of the section 106 payments system with a new National Infrastructure Levy; a shared framework of National Development Management Policies, removing much of this detail from Local Plans; replacement of Supplementary Planning Documents (SPD) with Supplementary Plans that carry more weight but would be subject to examination; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the local plan-making process; a speeded up plan-making process (plans to be prepared and adopted within 30 months); a strengthened role for the 'National Model Design Code'; and replacement of Neighbourhood Plans with Neighbourhood Priorities Statements. The change in Government could affect how the Act is implemented.
- **Brexit:** following the UK's departure from the European Union on 31 January 2020, it entered a transition period which ended on 31 December 2020. From 1 January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law.

3.7 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Enfield Council, that have declared a climate emergency.

International

3.8 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plans) should be in conformity with the relevant legislation.

National

3.9 There is an extensive range of national policies, plans and programmes that are of relevance to the Traveller Local Plan preparation and IIA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national plans, policies and programmes, focusing on those that are of most relevance. A summary of the main objectives of the NPPF and PPG of relevance to the Traveller Local Plan and IIA is provided below. In addition, the main sustainability objectives of other international and national plans and programmes which are of most relevance to the Traveller Local Plan and IIA have been reviewed and a summary of the implications for the Traveller Local Plan and IIA is provided below.

3.10 The NPPF¹⁶ is the overarching planning framework which provides national planning policy and principles for the planning system in England. The Traveller Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3.11 The national PPG¹⁷ sets out the Government’s planning policies for England and how these are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

3.12 The overarching nature of the NPPF means that its implications for the IIA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the framework and its implications for the plan-making process and the IIA is provided in more detail below.

3.13 The NPPF should be read in conjunction with the existing National Model Design Code¹⁸, which provides detailed guidance on the production of design codes, guides and policies to promote successful design.

3.14 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “*support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.*” Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

3.15 The Traveller Local Plan can identify areas where development would have lesser impacts in terms of its contribution to climate change (by limiting the need for site residents and users to travel, for example) or vulnerability to climate change. The IIA can consider the contribution the alternatives make in terms of climate change mitigation as well as climate change adaptation.

3.16 In relation to **health and wellbeing**, healthy, inclusive and safe places which promote social integration, are safe and accessible and enable and support healthy lifestyles are supported through the framework.

¹⁶ MHCLG (2024). National Planning Policy Framework. (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2/>)

¹⁷ MHCLG (2024). Planning Practice Guidance. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)

¹⁸ MHCLG (2021). National Model Design Code. (see <https://www.gov.uk/government/publications/national-model-design-code>)

3.17 One of the core planning principles is to “*take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community*”. It is identified in the NPPF that “*a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities*”. Furthermore, the retention and development of accessible local services and community facilities in rural areas, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship is supported. Importantly, Local plans should “*contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible*”.

3.18 The delivery of sites is considered to support local communities by meeting accommodation needs and addressing shortages. The Traveller Local Plan can have a significant influence on addressing inequalities, including those relating to health, and will need to consider the appropriate siting of pitches. The Traveller Local Plan can ensure that pitches are located in areas which can improve accessibility for residents and ensure that future development does not exacerbate existing inequalities. The IIA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy options that cumulatively improve the well-being of local communities.

3.19 The NPPF sets out the approach Local Plans should take in relation to **biodiversity**, stating that plans should “*identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation*”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

3.20 The Traveller Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should include approaches which support enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The IIA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of significant effects, both negative and positive significant effects.

3.21 In relation to **landscape**, the NPPF sets the planning principles of recognising the intrinsic character and beauty of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and National Landscapes.

3.22 The Traveller Local Plan should be supportive of an approach to development which would protect the landscape character of LBE and its surrounds. Where appropriate it should also seek to protect the identity of the built-up areas of LBE. The IIA should identify those alternatives which contribute positively to landscape and townscape character.

3.23 The NPPF states that in relation to the **historic environment** plans should “*set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats*”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

3.24 The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollution – including **water pollution and air quality**. Inappropriate development in areas at risk of **flooding** should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for infrastructure for water supply and wastewater.

3.25 The Traveller Local Plan can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The IIA process should seek to identify and address potential negative effects on the water resources and water quality, including implications relating to wastewater.

3.26 The NPPF states that planning system should protect and enhance **soils** in a manner commensurate with their statutory status or identified quality in the development plan, while also encouraging the reuse of **previously developed land**. The

Traveller Local Plan should seek to protect soil quality, including best and most versatile agricultural land. Further to this the Traveller Local Plan should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The IIA process should inform the development of the Traveller Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

3.27 The Traveller Local Plan can offer enhanced protection for both designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The IIA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

3.28 The framework sets out that in terms of **economic growth** the role of the planning system is to contribute towards building a “*strong, responsive and competitive economy*” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.

3.29 Local planning authorities should incorporate planning policies which “*support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation*”.

3.30 The Traveller Local Plan should seek to maximise the potential benefits of nearby strategic growth, while at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities within town and local centres are maintained and enhanced is also important and will also provide support for local communities. The IIA process can support the development of the new Traveller Local Plan to ensure that its policies are considerate of impacts on the economy in LBE. The IIA process can also be used to demonstrate that impacts on the viability of town and local centres have been considered.

3.31 The NPPF encourages local planning authorities to consider **transport** issues from the earliest stages of plan-making so that opportunities to promote walking, cycling and public transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

3.32 Growth will inevitably increase traffic on the roads which also has implications for **air quality**, and the Traveller Local Plan and IIA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Traveller Local Plan, as supported by the IIA, should seek to identify opportunities to maximise the potential for alternative modes of transport to private motor vehicles which use internal combustion engines, as these contribute towards air pollution. It is noted, however, that air pollution levels are likely to be reduced by the previous Government’s commitment to ban the sale of all new petrol and diesel cars by 2035, the increasing uptake of electric vehicles and the gradual rollout of electric vehicle charging networks. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. It is therefore also important to reduce the need to travel, or the need to travel so far, as this will help reduce emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

3.33 Intended to be read in conjunction with the NPPF, Planning Policy for Traveller Sites¹⁹ (PPTS) sets out the Government’s planning policies for traveller sites, including those for Gypsies, Travellers and Travelling Showpeople. It aims to ensure fair and equal treatment for Gypsies, Travellers and Travelling Showpeople while facilitating their traditional way of life and it also aims to promote integrated and sustainable development. The Government intends to review in the future whether PPTS should be incorporated within the wider NPPF and it is stated that this will be considered as part of any wider review of the framework.

3.34 The PPTS seeks to address the specific accommodation needs of Gypsies, Travellers and Travelling Showpeople communities by requiring local planning authorities to make adequate provision for Traveller sites, including through identifying and updating a five-year supply of deliverable sites, in addition to longer term requirements. The document seeks to ensure that these sites promote peaceful and integrated co-existence between Gypsies, Travellers and Travelling Showpeople and settled

¹⁹ MHCLG (2024) Planning Policy for Traveller Sites. (see <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>)

communities, provide a settled base, consider the local environmental quality and respect the extent to which traditional lifestyles can contribute to sustainability. In doing this, the PPTS encourages the use of criteria-based policies for determining planning applications for Traveller sites that may come forward.

3.35 The PPTS supports the objective of reducing unauthorised developments and encampments and improving enforcement outcomes. Here, local authorities are expected to meaningfully engage with Gypsies, Travellers and Travelling Showpeople and use a robust evidence base, typically through a GTAA, to inform policy responses. A key aim in using evidence to plan positively is to pay particular attention to early and effective community engagement with both settled and Traveller communities (including discussing Travellers' accommodation needs with Travellers themselves, their representative bodies and local support groups).

3.36 Considering the PPTS, the Traveller Local Plan must therefore be based on robust evidence, include clear site allocations or criteria-based policies and ensure compliance with national policy aims around fairness, sustainability and integration.

Other national plans and programmes

3.37 Numerous other plans and programmes at a national level are of relevance to preparation of the Traveller Local Plan and the IIA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the IIA will consider. There will be some overlap between IIA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the IIA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the plans and programmes (including the NPPF) for the Traveller Local Plan and IIA.

Climate change adaption and mitigation, energy efficiency and waste minimisation

3.38 The relevant national plans, policies and programmes under this topic are:

- Ministry of Housing, Communities and Local Government (MHCLG) and the Department for Levelling Up, Housing and Communities (DLUHC), Planning Practice Guidance (2025);
- MHCLG, National Planning Policy Framework (2024);
- Ministry of Housing, Communities and Local Government, HM Treasury, Department for Energy Security and Net Zero and Department for Levelling Up, Housing and Communities, The Policy Statement on Onshore Wind (2024);
- Department for Energy Security and Net Zero, The Clean Power 2030 Action Plan (2024);
- Department for Environment, Food & Rural Affairs (Defra), The Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting (2024);
- Department for Energy Security and Net Zero, The Carbon Budget Delivery Plan (2023);
- Department for Energy Security and Net Zero, Powering up Britain (2023);
- Department for Energy Security and Net Zero, The Energy Security Plan (2023);
- Department for Energy Security and Net Zero, The Net Zero Growth Plan (2023);
- Department for Energy Security and Net Zero, Biomass Strategy (2023);
- DLUHC, Levelling-up and Regeneration Act (2023);
- Department for Energy Security and Net Zero, Energy Act (2023);
- Department for Energy Security and Net Zero and Department for Business, Energy and Industrial Strategy, Heat and Buildings Strategy (2023);
- Department for Energy Security and Net Zero and Department for Business, Energy and Industrial Strategy, Net Zero Strategy: Build Back Greener (2022);
- Department for Energy Security and Net Zero and Department for Business, Energy and Industrial Strategy, British Energy Security Strategy (2022);

- Defra (2022), UK Climate Change Risk Assessment (2022);
- Department for Business, Energy and Industrial Strategy, UK Hydrogen Paper (2022);
- HM Government, The Energy Performance of Buildings Regulations (2021);
- Department for Business, Energy and Industrial Strategy, Industrial Decarbonisation Strategy (2021);
- HH Government, The Environment Act 2021;
- HM Government, The Waste (Circular Economy) Regulations (2020);
- The Energy White Paper: Powering Our Net Zero Future (2020);
- HM Government, 25 Year Environment Plan (2018);
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014);
- Department of Energy & Climate Change, The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012);
- HM Government, Flood and Water Management Act (2010);
- HM Government, The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009);
- HM Government, The UK Renewable Energy Strategy (2009);
- HM Government, Climate Change Act 2008; and
- HM Government, Planning and Energy Act (2008).

Implications for the Traveller Local Plan and IIA: The Traveller Local Plan should locate sites for Travellers in areas where sustainable transport patterns can be best achieved and encourage development that makes use of more sustainable construction methods and sources of energy. This will help minimise carbon emissions. The Traveller Local Plan should also contain policies to encourage appropriate use of Sustainable Drainage Systems (SuDS).

The IIA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

3.39 The relevant national plans, policies and programmes under this topic are:

- MHCLG and DLUHC, Planning Practice Guidance (2025);
- MHCLG, National Planning Policy Framework (2024);
- DLUHC, Levelling-up and Regeneration Act (2023);
- Homes England, Homes England Strategic Plan 2023 to 2028 (2023);
- Department of Health and Social Care, Build Back Better: Our Plan for Health and Social Care (2022);
- Public Health England, Healthy Weight Environments – Using the Planning System to Promote Healthy Weight Environment and Addendum (2020 and 2021 respectively);
- MHCLG, National Design Guide (2021);
- Department of Health and Social Care and Cabinet Office, COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021);
- Institute Of Health Equity, Health Equity in England: The Marmot Review 10 Years On (2020)

- Public Health England, PHE Strategy 2020-25 (2019);
- HM Government, 25 Year Environment Plan (2018);
- HM Government, The Environmental Noise Regulations (2018)
- Authority of the House of Lords, Select Committee on Public Service and Demographic: Ready for Ageing? (2013);
- The Marmot Review, Fair Society, Healthy Lives (2011);
- Department of Health and Social Care, Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010); and
- HM Government, Countryside and Rights of Way Act 2010.

Implications for the Traveller Local Plan and IIA: The Traveller Local Plan, in conjunction with the Infrastructure Delivery Plan should consider the need for infrastructure as this has a significant impact on the environment, and it should be prepared to ensure that the Traveller community has access to sustainable low carbon infrastructure and services and facilities, and that there is sufficient capacity within them to serve the population. This should include healthcare, education and open space. Sites for accommodation should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies in the Traveller Local Plan can also help to facilitate the supply of healthy local food. The provision of an appropriate level of pitches and plots over the Plan period will help address issues of disparity in terms of access to decent homes in the Plan area for Travellers. The provision should be considerate of local needs with regards to size, tenure and type.

Policy options considered for the Traveller Local Plan can be tested through the IIA in relation to the contributions they make towards these aims. The IIA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options.

Environment (biodiversity/geodiversity, landscape and soils)

3.40 The relevant national plans, policies and programmes under this topic are:

- MHCLG and DLUHC, Planning Practice Guidance (2025);
- UK Parliament, The Climate and Nature Bill (2024)
- MHCLG, National Planning Policy Framework (2024);
- Defra, The Air Quality Strategy (2023);
- Defra, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023);
- Natural England, Green Infrastructure Framework (2023);
- HM Government, The Environment Act 2021;
- HM Government, The Waste (Circular Economy) (Amendment) Regulations (2020);
- Department for Energy Security and Net Zero, Clean Air Strategy 2019;
- HM Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019);
- HM Government, 25 Year Environment Plan (2018);
- HM Government, The Waste Environment Regulations (2017);
- Defra, UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017);
- HM Government (2017), The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017);
- HM Government (2016), The Water Supply (Water Quality) Regulations (2016);

- Department for Communities and Local Government, National Planning Policy for Waste (2014);
- Defra, Biodiversity 2020: A Strategy for England's wildlife and ecosystem services (2011);
- Defra, The Natural Choice: Securing the Value of Nature (2011);
- Defra, Safeguarding Our Soils: A Strategy for England (2011);
- Defra, Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2011);
- Defra, Future Water: The Government's Water Strategy for England (2011);
- HM Government, Countryside and Rights of Way Act 2010;
- Defra, England Biodiversity Strategy Climate Change Adaptation Principles (2008);
- HM Government, Natural Environment and Rural Communities Act (2006); and
- HM Government, National Parks and Access to the Countryside Act 1949.

Implications for the Traveller Local Plan and IIA: The Traveller Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Plan should also take into account non-designated landscapes identified as particularly sensitive to development, and non-designated habitats which form part of the wider ecological network. The Plan also presents opportunities to promote the achievement of net gains in biodiversity. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by allocating sites in less sensitive locations. The allocation of new sites for pitches and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be the role of the IIA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

Historic environment

3.41 The relevant national plans, policies and programmes under this topic are:

- MHCLG and DLUHC, Planning Practice Guidance (2025);
- MHCLG, National Planning Policy Framework (2024);
- Historic England, Corporate Plan 2023-26 (2023);
- HM Government, The Heritage Statement 2017;
- HM Government, The Government's Statement on the Historic Environment for England (2010);
- HM Government, Planning (Listed Buildings & Conservation Areas) Act 1990;
- HM Government, Ancient Monuments and Archaeological Areas Act 1979; and
- HM Government, Historic Buildings and Ancient Monuments Act 1953.

Implications for the Traveller Local Plan and IIA: The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Traveller Local Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Policies should be included to address these issues and site options should be considered with regard to the potential for related issues. The IIA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment.

Water and air

3.42 The relevant national plans, policies and programmes under this topic are:

- MHCLG and DLUHC, Planning Practice Guidance (2025);
- MHCLG, National Planning Policy Framework (2024);
- Defra, The Air Quality Strategy for England (2023);
- Defra, The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023);
- Defra, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Waste (2023);
- HM Government, The Environment Act 2021;
- HM Government, The Waste (Circular Economy) (Amendment) Regulations (2020);
- Defra, Clean Air Strategy (2019);
- HM Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019);
- HM Government, 25 Year Environment Plan (2018);
- HM Government, The Road to Zero (2018);
- HM Government, Our Waste, Our Resources: A Strategy for England (2018);
- Defra, UK Plan for Tackling Nitrogen Dioxide Concentrations (2017);
- HM Government, The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017);
- HM Government, The Water Supply (Water Quality) Regulations 2016;
- HM Government, The Nitrate Pollution Prevention Regulations (2016);
- HM Government, The Environment Permitting Regulations (2016);
- HM Government, The Air Quality Standards Regulations (2016);
- Department for Communities and Local Government, National Planning Policy for Waste (2014);
- Defra, Water White Paper (2012);
- HM Government, National Policy Statement for Waste Water (2012);
- Defra, Safeguarding our Soils: A Strategy for England (2011);
- Defra, Future Water: The Government's Water Strategy for England (2008);
- Defra, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007);
- HM Government, The Environmental Protection Act 1990; and
- Defra, The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance (1990).

Implications for the Traveller Local Plan and IIA: The Traveller Local Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for pitches should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the period, the Traveller Local Plan should also factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution policy options can make to achieving these aims can be tested through the IIA. Individual site options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMA).

Economic growth

3.43 There are no specific international policy agreements under this topic relevant to the preparation of the Enfield Traveller Local Plan and the IIA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with other countries.

Implications for the Traveller Local Plan and IIA: Sites for pitches and plots should be located close to employment areas, to enable local people to be able to access the new employment opportunities.

The IIA can test individual site and policy options in relation to the contribution they can make to achieving these aims.

Transport

3.44 The relevant national plans, policies and programmes under this topic are:

- MHCLG and DLUHC, Planning Practice Guidance (2025);
- MHCLG, National Planning Policy Framework (2024);
- Department for Transport, Future of Transport: Supporting Rural Transport Innovation (2023);
- Secretary for Transport, The Cycling and Walking Investment Strategy Report to Parliament (2022);
- Defra, Decarbonising Transport: A Better, Greener Britain (2021);
- HM Government, The Environment Act 2021;
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020);
- Department for Transport, The Road to Zero (2018);
- Department for Transport, Transport Investment Strategy (2017);
- Highways England, Highways England Sustainable Development Strategy and Action Plan (2017); and
- Department for Transport, Door to Door: A Strategy for Improving Sustainable Transport Integration (2013).

Implications for the Traveller Local Plan and IIA: The IIA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the borough. As well as testing site options in terms of limiting the need to travel in Enfield, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub-national policy context

3.45 Below the national level there are further plans and programmes which are of relevance to the Traveller Local Plan and IIA process, namely the London Plan.

The London Plan

3.46 The London Plan 2021 is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plan. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan.

3.47 Policy S17: Reducing waste and supporting the circular economy in the London Plan seeks to promote a more circular economy that improves resource efficiency, as well as encouraging waste minimisation and waste prevention. By 2026, there should be zero biodegradable or recyclable waste to landfill and all London authorities must meet or exceed the municipal waste

recycling target of 65% by 2030. With regard to construction and demolition waste, 95% must be reused, recycled, or recovered. Enfield's household, commercial and industrial waste forecast for 2021 is 305,000 tonnes, and is projected to increase to 327,000 tonnes by 2041.

3.48 Policy SI2: Minimising greenhouse gas emissions states that there must be a minimum on-site reduction of emissions by at least 35% beyond Building Regulations. Residential development should achieve 10%, and non-residential should achieve 15% through efficiency measures.

3.49 Policy H14: Gypsy and Traveller accommodation requires all London boroughs to meet the identified need for permanent Gypsy and Traveller pitches and to include ten year pitch targets in their Development Plans. This target must be developed through undertaking a needs and assessment process and report, including auditing existing authority provided Gypsy and Traveller sites and pitches.

3.50 Policy G5: Urban greening outlines that boroughs should develop an Urban Greening Factor to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial developments (excluding B2 and B8 uses). Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50% green cover across London, will be important to help London become a National Park City.

3.51 Policy G6: Biodiversity and access to nature states that Sites of Importance for Nature Conservation (SINCs) should be protected. When developing Development Plans, boroughs should use up-to-date information about the natural environment and the relevant procedures to identify SINCs, ecological corridors and coherent ecological networks.

Key plans, policies and programmes for Enfield

3.52 The Core Strategy, Development Management Document and Area Action Plans currently form Enfield's Local Plan.

3.53 The Traveller Local Plan is anticipated to be adopted in 2026, following adoption of Enfield's new Local Plan in 2025/26, which contains a policy confirming the commitment to produce the Traveller Local Plan. These two documents will replace all existing policies contained in the Core Strategy, Development Management Document and the three Area Action Plans.

3.54 The new Local Plan will cover the period to 2041 and provide a single planning policy document for the borough and a new vision for how Enfield will spatially develop to 2041 and beyond. The new Local Plan will also include site allocations, identifying key development sites that can make a substantial contribution towards the borough's growth targets. It will provide site specific guidance and requirements for individual sites to ensure development comes forward in a manner that ensures each site fulfils its potential and properly responds to its context. The Traveller Local Plan as described at the start of this report will specifically address the accommodation needs of Travellers. The Plan will include site allocations and criteria-based policies aimed at meeting the assessed need for pitches within Enfield Borough.

3.55 These two documents, alongside the London Plan (2021), North London Waste Plan (2022) and any "Made" Neighbourhood Plans will form part of the new Development Plan for Enfield. The documents will be supported through the use of Supplementary Planning Documents where relevant.

3.56 The policy direction as described above is, however, subject to change until the new Local Plan is adopted.

Gypsy and Traveller accommodation needs assessments in adjoining local authorities

3.57 Development in the LBE will not be delivered in isolation from those areas around it. The following Gypsy and Traveller accommodation needs assessments have been prepared in each of the local authority areas neighbouring LBE. These assessments reflect the current position of the neighbouring authorities, and could be acknowledged through future Duty to Cooperate conversations.

London Borough of Barnet

- Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2021)²⁰
- West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2018)²¹

London Borough of Haringey

- London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)²²

London Borough of Waltham Forest

- London Borough of Waltham Forest Gypsy and Traveller Accommodation Assessment (2020)²³

Epping Forest District

- Epping Forest District Council Gypsy and Traveller Accommodation Assessment (2024)²⁴

Borough of Broxbourne

- Borough of Broxbourne Gypsy and Traveller Accommodation Assessment (2017)²⁵

Welwyn Hatfield

- Gypsy and Traveller and Travelling Showpeople – Accommodation Needs Assessment 2016 (2016)²⁶

Hertsmere

- Hertsmere Brough Council Gypsy and Traveller Accommodation Assessment (2017)²⁷

Baseline information

3.58 Baseline information provides the context for assessing the sustainability of proposals in the Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. To inform an IIA, baseline data must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.59 Schedule 2 of the SEA Regulations requires that the environmental report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

²⁰ Barnet Council (2021). Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2018). (see https://www.barnet.gov.uk/sites/default/files/update_report_gtaa.pdf)

²¹ Opinion Research Services (2018). West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. (see https://www.london.gov.uk/sites/default/files/rep-23-001a_london_borough_of_brent_appendix_to_hearing_statement.pdf)

²² Fordham Research (2008). London Boroughs' Gypsy and Traveller Accommodation Needs Assessment. (see https://www.haringey.gov.uk/sites/haringeygovuk/files/london_boroughs_gtana.pdf)

²³ Opinion Research Services (2020). London Borough of Waltham Forest Gypsy and Traveller Accommodation Assessment. (see <https://www.walthamforest.gov.uk/sites/default/files/2021-11/Gypsy%20and%20Traveller%20Accommodation%20Assessment%20Final%20Report%20%281%29.pdf>)

²⁴ Opinion Research Services (2024). Epping Forest District Council Gypsy and Traveller Accommodation Assessment. (see <https://www.eppingforestdc.gov.uk/app/uploads/2025/04/2025-03-20-Epping-Forest-GTAA-Final-Report.pdf>)

²⁵ Opinion Research Services (2017). Gypsy and Traveller Accommodation Assessment. (see <https://www.broxbourne.gov.uk/downloads/file/824/qt1-gypsy-and-Traveller-accommodation-assessment-2017>)

²⁶ Welwyn Hatfield Borough Council (2018). Gypsy and Traveller and Travelling Showpeople – Accommodation Needs Assessment 2016. (see https://archive.welhat.gov.uk/media/13613/EX76-WHBC-GTAA-2016-Updated-March-2018/pdf/EX76_WHBC_GTAA_2016_Updated_March_2018.pdf?m=636622467670100000)

²⁷ Opinion Research Services (2017). Hertsmere Borough Council Gypsy and Traveller Accommodation Assessment. (see <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Gypsy--Traveller-Information/2017-09-28-Hertsmere-GTAA-Final-Report.pdf>)

(3) The environmental characteristics of areas likely to be significantly affected.”

3.60 Schedule 2 (6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the inter-relationship between these. As an integrated SA/SEA with HIA, EqIA and CSIA is being carried out, baseline information relating to other 'sustainability' topics has also been included, for example, information about housing, social inclusiveness, crime, transport, energy, waste and economic growth.

3.61 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the IIA and monitored during the plan's implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Local Plan to understand the likely future sustainability conditions in the absence of the Local Plan.

3.62 Appendix C includes baseline information. This information is presented for a number of topic areas.

Key sustainability issues

3.63 Schedule 2 of the SEA Regulations requires the IIA to report on:

"Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017)."

3.64 Analysis of the baseline information has enabled a number of key sustainability issues facing the LBE to be identified. Key sustainability issues for the borough were previously identified through the Scoping process for the IIA of the emerging Local Plan in 2020, undertaken by AECOM. These issues were reviewed, revised, and supplemented in light of updates to the baseline information, as set out in the June 2021 IIA of the Enfield Local Plan: Main Issues and Preferred Approaches, undertaken by LUC. This chapter draws on this information with specific consideration given to Travellers.

3.65 By identifying these problems, the IIA can, as a minimum, help the Traveller Local Plan to avoid exacerbating these, and ideally highlight opportunities for the Traveller Local Plan to help to solve them. Such opportunities are also presented within this chapter.

Table 3.1 Key sustainability issues in Enfield and opportunities for the Traveller Local Plan to address them

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
Air quality		
<p>The London Borough of Enfield experiences problems with air quality, particularly between the east and west of the borough, and to the south. The entire borough has been declared an AQMA since 2001 and there are concerns the Ultra-Low Emission Zone in the south of the borough could potentially result in traffic re-routing in the borough, which could contribute towards air pollution issues elsewhere. Of particular concern is the effect future development in LBE could have on the Epping Forest SAC.</p>	<p>There is an Air Quality Management Area that covers the borough, which was designated because the area exceeds thresholds for nitrogen dioxide and PM₁₀. Through the site allocation process, the Traveller Local Plan presents the opportunity to effectively locate sites for Travellers at the most appropriate locations to limit reliance on private cars and other contributors to these air emissions. This would in turn promote travel via public transport or active travel modes.</p>	<p>IIA objective 11: Air pollution</p>
Biodiversity		
<p>A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London. However, the borough contains a number of designated and non-designated biodiversity assets which are experiencing recreational use pressures, as well as poor air quality, particularly the Epping Forest SAC. Habitats and species have the potential to come under increasing pressure from the provision of new housing, employment and infrastructure in Enfield, including at designated sites. This could include through increased disturbance (from recreation, noise and light) and atmospheric pollution as well as the loss of habitats and fragmentation of biodiversity networks. Habitat loss and fragmentation could be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. While there have recently been several network-led nature conservation efforts set out for the borough, the Mayor of London classifies 22% of the borough's population as having a lack of access to nature. Ecological connectivity across the borough could therefore be improved, in addition to the ecological status of watercourses. The Water Framework Directive 2000 is key to this, as it aims to bring watercourses from poor to good ecological status. Responsible management of sensitive wetlands is required at Lee</p>	<p>The Traveller Local Plan presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by locating sites away from the most sensitive locations and ensuring that sites are not allocated in areas that affect their current condition. It is important to locate sites and developments at least 8m from the riparian buffer zone of watercourses in the catchment, as ensuring no development or activity within this zone protects the habitats which support biodiversity and protected species.</p>	<p>IIA objective 13: Biodiversity</p>

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
Valley Regional Park, in addition to improved access.		
Climate change adaptation		
<p>Climate change is likely to increase temperatures and the subsequent risk of flooding and summer droughts. This is particularly the case in the borough, where the urban heat island effect results in summer temperatures up to 10°C warmer than more rural areas around Greater London, with the effects of heat more pronounced in the east of LBE, which could worsen as a result of increased urbanisation. Fluvial flood risk provides the greatest flood risk concern and is concentrated in the east of the borough along the River Lee.</p>	<p>Hotter, drier summers are expected as a result of ongoing and accelerating climate change. While the Traveller Local Plan will not influence extreme weather events, it can build upon the approach of current planning policy to ensure adaptation through design and better respond to current circumstances. This is likely to include protection against extreme weather events, the use of SuDS and green infrastructure as well as promotion of water conservation and recycling. There are opportunities for the Traveller Local Plan to consider adaptation through design to better respond to the extreme weather conditions as described.</p>	<p>IIA objective 2: Climate change adaptation IIA objective 17: Flooding</p>
Climate change mitigation		
<p>While CO₂ emissions have fallen in LBE, the Council has declared a climate emergency and will become a carbon neutral organisation by 2030, and a carbon neutral borough by 2040. To meet this, the borough will need to minimise the need to travel and reduce emissions associated with the built environment.</p>	<p>The Traveller Local Plan provides an opportunity to help limit the need to travel in the borough through the appropriate siting of new sites, in addition to designing buildings in a way that ensures high levels of energy efficiency. Climate change is, however, likely to have ongoing effects regardless of the Traveller Local Plan, considering the scale of the challenge this issue poses.</p>	<p>IIA objective 1: Climate change mitigation IIA objective 12: Sustainable transport</p>
Communities		
<p>In addition to the borough being characterised by an east-west divide in terms of inequality and deprivation, there are issues around social inclusion with regards to the Gypsy and Traveller community.</p>	<p>There are significant issues around social inclusion within Gypsy and Traveller communities, with many experiencing hate crimes, discrimination in the workplace, and prejudice within the education system. Baseline information suggests these issues are fed by the tensions that arise between Enfield's residential community and Gypsy and Traveller community, which are in of themselves generated by the prominence of unauthorised sites that lead to public concerns for sanitation, pressure on public services and disrupting access to certain facilities.</p> <p>The Traveller Local Plan therefore presents an opportunity to have an indirect effect on reducing discrimination and hate crimes towards the Gypsy and Traveller community by assisting in the allocation of authorised sites and</p>	<p>IIA objective 6: Social inclusion IIA objective 4: Health and wellbeing</p>

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
	<p>itches that in turn reduce tensions within the community and pressures on services. This may be achieved by ensuring authorised sites are well-integrated into the local community, well located to avoid the aforementioned concerns, and well positioned to foster social inclusion. Without the Traveller Local Plan it is less likely that these issues would be resolved in an effective manner that accounts for the baseline information to inform the decision making process.</p>	
Crime and community safety		
<p>Crime is a problem experienced across the borough and within the Gypsy and Traveller community, hate crimes and discrimination remain prevalent issues.</p>	<p>Within the Gypsy and Traveller community, hate crimes and discrimination remain an issue. The Traveller Local Plan presents the opportunity to have an indirect effect on reducing discrimination and hate crime towards the Gypsy and Traveller community through greater and more sensitive integration within existing communities. This may be achieved through effective site allocation processes, by ensuring sites are sensitively located within the local community, with equal access to necessary facilities to promote inclusion.</p>	<p>IIA objective 7: Crime and community safety</p>
Economy and employment		
<p>Education and skills provision could further meet the needs of Enfield's existing and future labour market, improving life chances for all, including Travellers. This is contributed to, particularly in Enfield, by the lack of authorised sites and pitches for residency.</p>	<p>The Traveller Local Plan presents the opportunity to address this inequality in the educational attainment Travellers and settled communities in the borough. For example, the allocation process for new authorised pitches and sites can seek to locate these new sites closer to existing or planned educational facilities, or closer to suitable transport networks to these facilities. This would help to encourage young Travellers to attend school and achieve qualifications. As such, it is likely that the evolution of this issue would not be addressed effectively without the Traveller Local Plan.</p>	<p>IIA objective 5: Services and facilities</p>
<p>As the number of unemployed people within the Traveller community is higher than the UK average, it is likely that there are higher levels of unemployment within the Gypsy and Traveller Community in Enfield.</p>	<p>The Traveller Local Plan will not allocate employment sites, but it can promote the allocation of Traveller sites near to areas of employment or within areas where there are good transport links for accessing employment opportunities, thereby promoting access and opportunities for all.</p>	<p>IIA objective 5: Services and facilities</p>

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
Health		
<p>LBE experiences flagship health issues revolving around air quality, obesity, diabetes and food deprivation, in addition to access to green spaces. There are also deficiencies in the borough's health infrastructure with inadequate GP facilities, cross boundary pressure on health services and issues around primary health services.</p>	<p>The provision of improved accommodation through the Traveller Local Plan should support improvements in health, as will siting new pitches in close proximity to essential community provisions such as parks, greenspaces, and healthcare facilities. Without the Traveller Local Plan it is likely that this could still be improved, however, improvements may be less targeted and generally less effective without clearly evidenced baseline information.</p>	<p>IIA objective 4: Health and wellbeing IIA objective 6: Social inclusion</p>
Heritage and townscape		
<p>LBE has a rich variety of designated heritage assets, all of which are continuously facing pressures for change, often indirectly, and from inappropriate development and activity affecting their setting and context.</p>	<p>There are many sites, features and areas of historical and cultural interest in the LBW, a number of which (23) are at risk, and which could be further adversely affected by poorly planned development. The Traveller Local Plan presents the opportunity to guide new sites and pitches for Travellers to locations which are less sensitive in terms of their impact on heritage assets (also with consideration for other sustainability issues) through the IIA process.</p>	<p>IIA objective 14: Historic environment</p>
Housing		
<p>No authorised pitches or sites for Travellers exist within Enfield. There is a cultural shortfall of 30 pitches over the plan period to 2041. From existing households wanting to move onto a pitch and newly-forming households, of this need, 16 are needed in the first five years (2020/21 to 2024/25) and 14 over the remaining period to 2040/41.</p>	<p>The Traveller Local Plan offers the opportunity to facilitate and expedite the delivery of appropriate sites to meet the needs of the community.</p>	<p>IIA objective 3: Pitches IIA objective 6: Social inclusion</p>
Landscape and green infrastructure		
<p>There are a number of valued landscapes within LBE that fall within the Green Belt, including designed landscapes and extensive semi-rural landscape character areas, all of which need to be protected.</p>	<p>The Traveller Local Plan presents an opportunity to manage the sensitivities of the boroughs landscapes and greenspaces to reach this goal, for example, by locating sites away from the most sensitive locations and ensuring that sites are not allocated in areas that restrict green infrastructure networks or affect their condition.</p>	<p>IIA objective 15: Landscape and townscape IIA objective 16: Efficient use of land and materials</p>

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
Transport		
<p>The majority of residents in Enfield use a private car. The Traveller community across the UK has a higher number of people without access to a car. There are no available statistics for this in Enfield but given the size of the Gypsy and Traveller population (just 0.1% of the borough) it is unlikely that the data would be significantly different.</p>	<p>Through the site allocation process, the Traveller Local Plan can promote the development of Traveller sites and pitches in close proximity to suitable and sustainable transport links to promote equality and sustainable transport modes in tandem. This will help to ensure residents of all communities have equal access to services and facilities further afield.</p>	<p>IIA objective 12: Sustainable transport IIA objective 11: Air pollution IIA objective 1: Climate change mitigation</p>
Water		
<p>LBE is located within an area of water stress where demand is high and supply is subject to constraints. The borough is serviced by the Deephams Sewage Treatment Works, which will need significant upgrade in order to continue to service a growing population.</p>	<p>The Traveller Local Plan provides an opportunity for more specific policy wording that addresses the insufficient supply of water in the borough and the provision of water infrastructure.</p>	<p>IIA objective 18: Water</p>
<p>There are a number of water quality issues that impact the borough, with none of the main watercourses currently meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The borough is also covered by a number of Source Protection Zones (SPZs) that may be at risk of potential contamination.</p>	<p>The borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include agricultural waste and wastewater discharges.</p> <p>Without the Traveller Local Plan it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. The Traveller Local Plan provides an opportunity to ensure that sites for Travellers are located and designed to consider the sensitivity of the water environment and water-dependent protected sites, to plan for adequate wastewater infrastructure, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency within the Gypsy and Traveller community.</p>	<p>IIA objective 18: Water</p>

The IIA framework

3.66 The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

3.67 The proposed IIA framework for Enfield's Traveller Local Plan is presented overleaf in **Table 3.2**. It is based on the IIA framework used to appraise Enfield's Local Plan; however it has been revised following the analysis of international, national and sub-national plans and programmes, the baseline information, and the key sustainability issues identified for Traveller communities in the plan area. The following IIA objectives contained within the IIA framework used to appraise Enfield's Local Plan have been scoped out, as they were considered to be outside the scope of the Traveller Local Plan:

- IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety – the Traveller Local Plan does not intend to address the 'Vision Zero' target for road safety.
- IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all – the Traveller Local Plan does not intend to deliver employment; access to existing employment for Travellers is covered under IIA objective 5: Services and facilities instead.
- IIA objective 10: Support the vitality of the borough's town and local centres – the Traveller Local Plan does not intend to specifically support development within town and local centres

3.68 The Traveller Local Plan has therefore not been appraised against these three objectives. The numbering of the remaining IIA objectives that the Traveller Local Plan has been appraised against has not changed.

3.69 Following consultation of the IIA Scoping Report, an additional appraisal question was added to the IIA framework under IIA objective 13: "Will the Traveller Local Plan avoid impacts on watercourses by maintaining the 8m riparian buffer zone, while maximising opportunities to further enhance biodiverse aquatic and riparian habitats supporting biodiversity?".

Table 3.2 IIA framework

IIA objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
IIA objective 1: Ensure the Traveller Local Plan helps Enfield become a carbon neutral borough by 2040	<p>Ensure sites are in sustainable locations that minimise the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Increase the proportion of journeys made via public transport, on foot or by cycle?</p>	<p>Climatic factors</p> <p>Air</p>
IIA objective 2: 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	<p>Require the incorporation of sustainable design and construction techniques in sites?</p> <p>Ensure that sites are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p> <p>Reduce the risk of damage to people and property from extreme weather events?</p>	<p>Climatic factors</p> <p>Human health</p> <p>Biodiversity, flora and fauna</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>
IIA objective 3: Deliver the sites needed to meet the accommodation needs of Gypsies and Travellers, supporting an appropriate mix of permanent sites and transit sites	<p>Provide an adequate supply of sites to meet the needs of Gypsies and Travellers?</p> <p>Help reduce the number of unauthorised sites and encampments?</p> <p>Ensure sites are managed appropriately?</p> <p>Provide good quality pitches and plots for Gypsies and Travellers?</p> <p>Provide a decent home for all?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 4: Improve the physical and mental health and wellbeing of Gypsies, Travellers and Travelling Showpeople, while also reducing health inequalities between travelling and settled communities	<p>Improve access to healthcare?</p> <p>Improve access to outdoor and indoor sport and leisure facilities, in addition to recreation facilities?</p> <p>Improve access to open space and the countryside, including Lee Valley Regional Park, recognising its sensitivity to human disturbance?</p> <p>Limit the risk of air, noise and light pollution on both Gypsies, Travellers and Travelling Showpeople and settled communities, from occupation of and</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>

IIA objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
	<p>travel to/from sites?</p> <p>Ensure an amenity block is provided at each pitch with access to mains water, electricity, a toilet/bathroom, a kitchen and dining area?</p>	
<p>IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing travelling communities, mindful of the potential for community needs to change over time</p>	<p>Ensure sites are in sustainable locations that minimise the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Improve access to good quality services and facilities?</p> <p>Improve access to community facilities?</p> <p>Encourage increased engagement and improved access to leisure and cultural opportunities for Gypsies and Travellers?</p> <p>Locate pitches and plots close to education facilities, so as to support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
<p>IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity</p>	<p>Develop social cohesion through the appropriate siting of pitches and plots?</p> <p>Help improve access to employment opportunities for Gypsies and Travellers?</p> <p>Facilitate access to community services and facilities?</p> <p>Ensure sites are located within close proximity to open space, encouraging interaction between travelling and settled communities?</p>	<p>Population</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
<p>IIA objective 7: Reduce crime and increase community safety</p>	<p>Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team?</p> <p>Reduce levels of crime, anti-social behaviour and the fear of crime through intervention, e.g. public space provision, passive surveillance, lighting, etc.?</p> <p>Help improve access to community and youth facilities in areas where Gypsies and Travellers are based?</p> <p>Increase the perception of safety from crime?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Community Safety Impact Assessment</i></p>

IIA objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
	Promote design of buildings and public spaces to reduce the potential of crime?	
IIA objective 11: Minimise air pollution	Locate sites away from existing air pollution hotspots? Minimise air pollution caused by traffic and commercial vehicles?	Air Human health <i>Health Impact Assessment</i>
IIA objective 12: Minimise the need to travel and support a modal shift away from the private vehicle	Make provision for safe and easy access to public transport services? Promote and facilitate the use of electric cars and sustainable modes of transport? Locate sites in areas with walking and cycling links to more built-up areas with everyday amenities? Provide good access to services and facilities via active travel and public transport?	Population Air Human health Climatic factors Material assets <i>Health Impact Assessment</i>
IIA objective 13: Avoid/mitigate impacts to valued habitats and ecological networks	Maintain the integrity of the Epping Forest SAC? Protect locally designated and non-designated biodiversity sites from both the direct and indirect adverse effects of development, including recreational pressure? Avoid impacts of development and human disturbance on Lee Valley Regional Park? Safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs? Take into account opportunities to enhance biodiversity in the layout and design of development, including allowing species to adapt to climate change? Avoid impacts on watercourses by maintaining the 8m riparian buffer zone,	Biodiversity, flora and fauna

IIA objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
	while maximising opportunities to further enhance biodiverse aquatic and riparian habitats supporting biodiversity?	
IIA objective 14: Sustain and enhance the significance of heritage assets	<p>Support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated?</p> <p>Facilitate enhancements to the fabric and setting of the historic environment?</p> <p>Support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets)?</p> <p>Protect, maintain and enhance scheduled monuments and archaeological sites, and their setting?</p> <p>Protect, maintain and enhance registered parks and gardens, and their settings?</p> <p>Improve participation in cultural activities?</p> <p>Promote greater understanding and enhancement of the borough's historic environment, such as parks and open spaces, and areas with a particular heritage significance?</p>	Cultural heritage including architectural and archaeological heritage
IIA objective 15: Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes	<p>Protect and enhance the landscape and townscape through the appropriate location, layout and design of sites, including the preservation of important open gaps and key views?</p> <p>Protect and enhance the local distinctiveness and contribution to a sense of place?</p>	Landscape Cultural heritage including architectural and archaeological heritage
IIA objective 16: To achieve efficient use of land and materials	<p>Avoid locating sites on high quality agricultural land?</p> <p>Ensure the re-use and redevelopment of brownfield sites?</p> <p>Encourage minimisation, reuse and recycling of waste?</p>	Soil Material assets

IIA objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
IIA objective 17: To manage and reduce the risk of flooding	<p>Minimise the risk of flooding to people and property from rivers?</p> <p>Avoid allocating sites in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?</p> <p>Support the incorporation of Sustainable Urban Drainage Systems (SUDS) (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows?</p>	<p>Human health</p> <p>Water</p> <p>Climatic factors</p> <p><i>Health Impact Assessment</i></p>
IIA objective 18: Minimise water use and protect water quality	<p>Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality?</p> <p>Locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available?</p> <p>Require the incorporation of SuDS?</p> <p>Increase water efficiency, particularly in new developments through innovative design measures?</p>	<p>Water</p>

Chapter 4

Integrated Impact Assessment findings for the reasonable alternative site options

4.1 This chapter provides the IIA findings for the reasonable alternative site options considered for allocation in the Traveller Local Plan (Submission Plan). As described in Chapter 2, nine of the eleven sites identified in the Council's Site Selection Topic Paper were considered reasonable alternatives and have been appraised by the IIA. These sites have been appraised on their own merits on a 'policy-off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects. Due to the fact two of the sites (TLP_10 and TLP_11) cover large areas, uncertainty has been added to all relevant effects to reflect the fact that it is unknown where in each of these two sites the pitches would be located.

4.2 The likely effects of each site option are presented in **Table 4.1**, and justification for the identified effects in relation to each IIA objective is provided below the table. Unless otherwise stated, the effects are assumed to be long-term and permanent. Of the nine site options, five have been taken forward in the Submission Plan. The IDs for these sites are shown in **bold** in **Table 4.1**.

Reasonable alternative site options subject to IIA

- TLP_01: Bulls Cross Nursery
- TLP_03: Land adjacent to Ridgeway
- TLP_04: Hillyfields Depot & Land
- TLP_05: Comreddy Close
- TLP_07: Land Sterling Way / Weighbridge
- TLP_08: Land south of Dendridge Close
- TLP_09: Land A10
- TLP_10: Chase Park
- TLP_11: Crews Hill

Table 4.1 Integrated Impact Assessment findings for the reasonable alternative site options

Site	IIA1: Climate change mitigation	IIA2: Climate change adaptation	3a Pitch provision	IIA3: Pitches	4a GP surgeries	4b Access to recreation	4c Loss of recreation	4d Acoustic privacy	IIA4: Health and wellbeing	5a Education	IIA5: Services and facilities	6a Social inclusion	IIA6: Social inclusion	IIA7: Crime and community safety	11a NO ₂ pollution	11b PM ₁₀ pollution	11c PM _{2.5} pollution	IIA11: Air pollution	12a Sustainable transport	12b Services and facilities	IIA12: Sustainable transport	13a International and national biodiversity and geodiversity assets	13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland	IIA13: Biodiversity and geodiversity	14a Proximity to historic assets: sites within existing settlements	14b Proximity to historic assets: sites outside of existing settlements	IIA14: Historic environment	15a Landscape and townscape	15b Open space	IIA15: Landscape and townscape	16a Brownfield/greenfield land	16b Agricultural Land Classification	IIA16: Efficient use of land	17a Flood zones	17b Surface water flood risk	IIA17: Flooding	18a Water quality	IIA18: Water
TLP_01	N/A	N/A	++	++	-	++	0	0	+	++	++	-	-?	N/A	-	0	-	-	--	-	--	0	--	--	N/A	--	--?	--	0	--?	-	-	-	0	-	-	--	--
TLP_03	N/A	N/A	++	++	-	+	0	-	-	-	-	-	-?	N/A	-	-	-	-	--	-	--	0	-	-	N/A	--	--?	--	0	--?	-	-	-	0	0	0	0	0
TLP_04	N/A	N/A	+	+	-	++	--	0	-	++	++	-	-?	N/A	-	-	-	-	--	-	--	0	--	--	N/A	--	--?	-	--	--?	++?	0	++?	0	0	0	0	0
TLP_05	N/A	N/A	+	+	-	++	0	0	+	++	++	-	-?	N/A	-	-	-	-	-	-	-	0	-	-	N/A	--	--?	0	0	0?	-	0	-	0	--	--	0	0
TLP_07	N/A	N/A	++	++	++	++	--	--	0	++	++	-	-?	N/A	--	-	-	-	-	++	+	0	--	--	--	N/A	--?	-	--	--?	-	0	-	0	-	-	0	0
TLP_08	N/A	N/A	++	++	-	++	0	--	-	++	++	-	-?	N/A	--	-	-	-	-	-	-	0	--	--	N/A	--	--?	0	0	0?	-	-	-	0	0	0	--	--
TLP_09	N/A	N/A	++	++	++	++	--	--	0	++	++	-	-?	N/A	--	-	-	-	-	-	-	0	-	-	--	N/A	--?	+	--	--?	++?	0	++?	0	-	-	--	--
TLP_10	N/A	N/A	++	++	++?	++	0	0	++?	++?	++?	+	++?	N/A	--?	-?	-	-?	--?	++?	0?	0	--?	--?	N/A	--	--?	--	0	--?	++?	0	++?	0?	--?	--?	--?	--?
TLP_11	N/A	N/A	++	++	-	++	0	-	+	++?	++?	+	++?	N/A	--?	-?	-	-?	--	--	--	0	--?	--?	N/A	--	--?	--	0	--?	++?	0	++?	0?	--?	--?	--?	--?

IIA objective 1: Ensure the Traveller Local Plan helps Enfield become a carbon neutral Borough by 2040

4.3 This objective has been scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. Instead, effects will largely depend on the detailed proposals for sites and their design, which would be influenced by policies in the Traveller Local Plan and details submitted at the planning application stage.

IIA objective 2: 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

4.4 This objective has been scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. Instead, effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Traveller Local Plan and details submitted at the planning application stage.

IIA objective 3: Deliver the sites needed to meet the accommodation needs of Gypsies and Travellers, supporting an appropriate mix of permanent sites and transit sites

4.5 All sites with the exception of TLP_04 and TLP_05 are expected to have major positive effects against criterion *3a Pitch provision*, as they provide six or more pitches. As such, they best meet the accommodation needs of Gypsies and Travellers (see 'Criteria used to assess site options' section of **Chapter 2** for further information). Sites TLP_04 and TLP_05 are expected to have minor positive effects against this criterion, as they provide fewer than six pitches but will still help meet the accommodation needs of Gypsies and Travellers.

4.6 For the reasons outlined above, all sites with the exception of TLP_04 and TLP_05 are expected to have significant positive effects overall in relation to IIA objective 3, while sites TLP_04 and TLP_05 are expected to have minor positive effects.

IIA objective 4: Improve the physical and mental health and wellbeing of Gypsies, Travellers and Travelling Showpeople, while also reducing health inequalities between travelling and settled communities

4.7 Sites TLP_07, TLP_09 and TLP_10 are expected to have major positive effects against criterion *4a GP surgeries* as they are within 400m of a GP surgery. Therefore, residents will have easy access to healthcare. However, it is acknowledged that this is dependent on there being capacity at those healthcare facilities to accommodate new residents. Due to the fact site TLP_10 is identified as a broad location and it is unknown where in the site pitches would be located, it is unknown whether the pitches would be within 400m of a GP surgery or not. Therefore, the major positive effect identified for site TLP_10 is recorded as uncertain. The remaining sites are expected to have minor negative effects against this criterion as they are more than 800m from a GP surgery and so do not provide easy access to healthcare.

4.8 All sites with the exception of TLP_03 are expected to have major positive effects against criterion *4b Access to recreation* as they are within 800m of an open space and 400m of a walking or cycling path. Therefore, the locations of these sites could promote outdoor recreation and encourage more walking and cycling, which could have beneficial effects on people's physical health and mental wellbeing. Site TLP_03 is expected to have a minor positive effect against criterion 4b as although it is within 800m of an open space, it is not within 400m of a walking or cycling path and so is unlikely to facilitate active travel.

4.9 Sites TLP_04, TLP_07 and TLP_09 are expected to have major negative effects against criterion *4c Loss of recreation* as they all contain existing open space, which could be lost as a result of locating pitches at these sites. This includes Metropolitan Open Land, of which three sites are located within (TLP_07 and TLP_09). All other sites are expected to have negligible effects against this criterion as they do not contain any existing open spaces that could be lost as a result of siting pitches on them. This includes sites TLP_01 and TLP_11. Site TLP_01 contains an area of open space but no typology is recorded for the open space and it is gated and therefore not available for public use. Site TLP_11 contains a golf course but due to the fact it is for private use, the site is not recorded as containing an open space.

4.10 Sites TLP_07, TLP_08 and TLP_09 are expected to have major negative effects against criterion *4d Acoustic privacy* as major noise issues are experienced on or close to these sites, which require mitigation before they can be used. The noise pollution could have adverse effects on people's wellbeing. Sites TLP_03 and TLP_11 are expected to have minor negative effects against criterion 4d as while they also experience noise pollution, they do not require mitigation before they can be used. The remaining site options are expected to have negligible effects against criterion 4d as they have no noise issue or existing acoustic barriers.

4.11 For the reasons outlined above, sites TLP_03, TLP_04 and TLP_08 are expected to have minor negative effects overall in relation to IIA objective 4, while sites TLP_07 and TLP_09 are expected to have negligible effects. Sites TLP_01, TLP_05, TLP_10 and TLP_11 are expected to have minor positive effects. Due to the fact the effect recorded for site TLP_10 is uncertain in relation to criterion 4a, its overall minor positive effect for IIA objective 4 is recorded as uncertain.

IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing travelling communities, mindful of the potential for community needs to change over time

4.12 All sites with the exception of TLP_03 are expected to have major positive effects against criterion *5a Education*, as they are within 800m of at least one primary and one secondary school. Therefore, they provide easy access to education. However, this is dependent on there being capacity at those schools to accommodate new pupils. Site TLP_03 is expected to have a minor negative effect against criterion 5a as it is more than 800m from a primary school and secondary school. Due to the fact that sites TLP_10 and TLP_11 are identified as broad locations and it is unknown where in each site pitches would be located, it is uncertain whether the pitches would be within 800m of a primary and secondary school or not. Therefore, the major positive effects for sites TLP_10 and TLP_11 are recorded as uncertain.

4.13 For the reasons outlined above, all sites with the exception of TLP_03 are expected to have significant positive effects overall in relation to IIA objective 5. Site TLP_03 is expected to have a minor negative effect. The major positive effects sites TLP_10 and TLP_11 receive are recorded as uncertain for the reasons outlined above.

IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

4.14 All sites with the exception of TLP_10 and TLP_11 are expected to have minor negative effects against criterion *6a Social inclusion* as they are outside of an existing or planned new community and so could prevent social integration between travelling and settled communities. Sites TLP_10 and TLP_11 are expected to have minor positive effects against criterion 6a, as they are located within planned new communities and so could contribute towards social inclusion and promotion of equality and respect through the creation of sustainable, mixed communities.

4.15 For the reasons outlined above, all sites with the exception of TLP_10 and TLP_11 are expected to have minor negative effects overall in relation to IIA objective 6. Sites TLP_10 and TLP_11 are expected to have minor positive effects. All effects are recorded as uncertain, as there is some potential for social cohesion issues between travelling and settled communities.

IIA objective 7: Reduce crime and increase community safety

4.16 This objective has been scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. Instead, effects will depend largely on factors such as the incorporation of green space within sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. Effects will also depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Traveller Local Plan and details submitted at the planning application stage.

IIA objectives 8 to 10

4.17 As explained in **Chapter 3**, IIA objectives 8, 9, and 10 contained within the IIA framework used to appraise Enfield's Local Plan were considered to be outside the scope of the Traveller Local Plan.

IIA objective 11: Minimise air pollution

4.18 Sites TLP_07, TLP_08, TLP_09, TLP_10 and TLP_11 are expected to have major negative effects against criterion *11a NO₂ pollution*, as the current annual mean concentration of NO₂ at these sites exceed the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK's national air quality objectives. However, it is acknowledged that sites TLP_10 and TLP_11 which cover large areas, also contain areas where the current annual mean concentration of NO₂ does not exceed the 2021 WHO air quality guidelines or the higher pollution levels allowed under the UK's national air quality objectives. As it is unknown where in each of these sites the pitches would be located, it is uncertain whether the pitches would be within an area that exceeds said guidelines and objectives or not. Therefore, the major negative effects that sites TLP_10 and TLP_11 could have are recorded as uncertain. The remaining sites are expected to have minor negative effects against criterion 11a, as the current baseline annual mean concentration of NO₂ exceeds the 2021 WHO guidelines only.

4.19 All sites with the exception of TLP_01 are expected to have minor negative effects against criterion *11b PM₁₀ pollution*, as the current baseline annual mean concentration of PM₁₀ exceeds the 2021 WHO guidelines. However, it is acknowledged that sites TLP_10 and TLP_11 which cover large areas, also contain areas where the current annual mean concentration of PM₁₀ does not exceed the 2021 WHO guidelines. As it is unknown where in each of these sites the pitches would be located, it is uncertain whether the pitches would be within an area that exceeds the guidelines. Therefore, the minor negative effects that sites TLP_10 and TLP_11 could have are recorded as uncertain. Site TLP_01 is expected to have a negligible effect against criterion 11b as the baseline annual mean concentration of PM₁₀ does not exceed the 2021 WHO guidelines.

4.20 All sites are expected to have minor negative effects against criterion *11c PM_{2.5} pollution*, as the current baseline annual mean concentration of PM_{2.5} exceeds the 2021 WHO guidelines.

4.21 For the reasons outlined above, all sites are expected to have minor negative effects overall in relation to IIA objective 11, with the minor negative effects for sites TLP_10 and TLP_11 recorded as uncertain.

IIA objective 12: Minimise the need to travel and support a modal shift away from the private vehicle

4.22 Sites TLP_01, TLP_03, TLP_04, TLP_10 and TLP_11 have a PTAL rating of 0, 1a or 1b, which indicates that these sites have very poor public transport connectivity relative to other areas of London. Therefore, they are unlikely to support modal shift. As such, they are expected to have major negative effects against criterion *12a Sustainable transport*. However, it is acknowledged that site TLP_10, which covers a large area, contains a small area to its south west with a PTAL rating of 2 and 3, which indicates slightly better access to public transport. As it is unknown where in the site pitches would be located, it is possible the pitches could be located within this area with a slightly higher PTAL rating. Therefore, the major negative effect is recorded as uncertain. The remaining sites have a slightly higher PTAL rating of 2. As such, the remaining sites are expected to have minor negative effects against criterion 12a. It should be noted, however, that as an outer London borough, much of Enfield borough has relatively poor public transport connectivity, particularly relative to Central London, and that locations with low PTAL ratings may nevertheless have some reasonably frequent and/ or reasonably walkable public transport options.

4.23 Sites TLP_03 and TLP_11 are expected to have major negative effects against criterion *12b Services and facilities*, as they are located more than 800m from a major, district or local centre, and so residents will need to travel some distance to reach these centres where most services and facilities are located. Sites TLP_01, TLP_04, TLP_05, TLP_08 and TLP_09 are expected to have minor negative effects against criterion 12b as they are located within 401-800m of major, district or local centres. Therefore, residents will still need to travel some distance to reach services and facilities. Sites TLP_07 and TLP_10 are expected to have major positive effects against this criterion, as they are located within easy walking distance of major, district or local centres. Therefore, residents will not need to travel far to reach everyday amenities and can most likely travel via foot or bike. Due to the fact that site TLP_10 covers a large area and it is uncertain where in the site pitches would be located, it is unknown whether the pitches would be within easy walking distance of the nearby local centres or not. Therefore, the major positive effect that site TLP_10 could have is recorded as uncertain.

4.24 For the reasons outlined above, sites TLP_01, TLP_03, TLP_04 and TLP_11 are expected to have significant negative effects overall in relation to IIA objective 12, while sites TLP_05, TLP_07, TLP_08 and TLP_09 are expected to have minor negative effects. Site TLP_07 is expected to have a significant positive effect. Site TLP_10 is expected to have a negligible effect and due to the fact there is some uncertainty regarding the effects of site TLP_10 in relation to criteria 12a and 12b, its overall negligible effect for IIA objective 12 is recorded as uncertain.

IIA objective 13: Avoid/mitigate effects to valued habitats and ecological networks

4.25 All sites are expected to have negligible effects against criterion *13a International and national biodiversity and geodiversity assets*, as they do not intersect any internationally or nationally designated sites or relevant Site of Special Scientific Interest (SSSI) Impact Risk Zones.

4.26 All sites with the exception of TLP_03 and TLP_09 are expected to have major negative effects against criterion *13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland*, as they intersect Priority Habitats (TLP_01, TLP_05, TLP_07, TLP_08, TLP_10 and TLP_11) and Sites of Importance for Nature Conservation (TLP_04, TLP_07, TLP_08, TLP_10 and TLP_11). Therefore, locating pitches at these sites would most likely have adverse effects on the natural environment. Due to the fact that sites TLP_10 and TLP_11 are identified as broad locations and it is unknown where in each site pitches would be located, it is unknown whether the pitches would intersect or lie within close proximity of Priority Habitats or Sites of Importance for Nature Conservation. Therefore, the major negative effects that sites TLP_10 and TLP_11 could have

are recorded as uncertain. Sites TLP_03, TLP_05 and TLP_09 are expected to have minor negative effects as they are within 250m of Priority Habitats or Sites of Importance for Nature Conservation.

4.27 For the reasons outlined above, all sites with the exception of TLP_03 and TLP_09 are expected to have significant negative effects overall in relation to IIA objective 13. Sites TLP_03 and TLP_09 are expected to have minor negative effects overall. Due to the fact that there is some uncertainty about the effects of sites TLP_10 and TLP_11 on criterion 13b, their overall significant negative effects are recorded as uncertain.

IIA objective 14: Sustain and enhance the significance of heritage assets

4.28 All nine sites are expected to have major negative effects against criteria *14a Proximity to historic assets: sites within existing settlements* or *14b Proximity to historic assets: sites outside of existing settlements*, as they are all within close proximity of, or contain, heritage assets. Although sites TLP_10 and TLP_11 are identified as broad locations and it is unknown where in each site pitches would be located, both sites are entirely within close proximity of heritage assets. Therefore, all nine sites could have adverse effects on the settings of heritage assets.

4.29 For the reasons outlined above, all sites are expected to have significant negative effects overall in relation to IIA objective 14. All effects are recorded as uncertain in the absence of a heritage impact assessment.

IIA objective 15: Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes

4.30 Sites TLP_01, TLP_03, TLP_10 and TLP_11 are expected to have major negative effects against criterion *15a Landscape and townscape* for the reasons outlined below. These four sites are not covered by Enfield's 'Character of Growth Study' and so were appraised using a more simplistic appraisal method, based on their size and whether they are located in urban or more rural areas. Sites TLP_01 and TLP_03 are not located near any settlements and in a rural area, while sites TLP_10 and TLP_11 are large in scale (more than or equal to 3ha) and located within relatively undeveloped areas. Sites TLP_04 and TLP_07 are expected to have minor negative effects against criterion 15a, as site TLP_04 is not large in scale and located on the edge of a settlement, while TLP_07 is located within a settlement but does not contain built development. Site TLP_09 is expected to have a minor positive effect against criterion 15a as although it was not covered by the Character of Growth Study, it is located within a settlement and contains built development. Sites TLP_05 and TLP_08 are expected to have negligible effects against criterion 15a, as according to the Character of Growth Study, they both fall within an area where 'Transformative Change' is recommended.

4.31 Sites TLP_04, TLP_07 and TLP_09 are expected to have major negative effects against criterion *15b Open space* as they all contain existing open space, which could be lost as a result of locating pitches at these sites. This includes Metropolitan Open Land, which three sites are located within (TLP_07 and TLP_09). All other sites are expected to have negligible effects against this criterion as they do not contain any existing open spaces that could be lost as a result of siting pitches on them.

4.32 For the reasons outlined above, sites TLP_01, TLP_03, TLP_04, TLP_07, TLP_09, TLP_10 and TLP_11 are expected to have significant negative effects overall in relation to IIA objective 15, while the remaining sites are expected to have negligible effects. All effects are recorded as uncertain in the absence of a landscape character assessment.

IIA objective 16: To achieve efficient use of land and materials

4.33 Sites TLP_04, TLP_09, TLP_10 and TLP_11 are expected to have major positive effects against criterion *16a Brownfield/greenfield land*, as they contain buildings that could possibly be converted for Gypsy and Traveller use. As it is only a possibility that these buildings can be converted for Gypsy and Traveller use, all major positive effects are recorded as uncertain. The remaining sites are expected to have minor negative effects against this criterion, as they do not contain buildings on site that could be reused for Gypsy and Traveller use.

4.34 Sites TLP_01, TLP_03 and TLP_08 are expected to have minor negative effects against criterion *16b Agricultural Land Classification* as they comprise Grade 3 agricultural land. Some Grade 3 agricultural land (Grade 3a) is considered best and most versatile agricultural land. However, data was not available that distinguishes between Grades 3a and 3b agricultural land. All other sites are expected to have negligible effects against criterion 16b as they contain existing built development.

4.35 For the reasons outlined above, sites TLP_01, TLP_03, TLP_05, TLP_07 and TLP_08 are expected to have minor negative effects overall in relation to IIA objective 16. The remaining sites (TLP_04, TLP_09, TLP_10 and TLP_11) are expected

to have significant positive effects overall. Due to the fact that there is some uncertainty regarding the effects of these five sites on criterion 16a, their overall significant positive effects are recorded as uncertain.

IIA objective 17: To manage and reduce the risk of flooding

4.36 All nine sites are expected to have negligible effects against criterion *17a Flood zones*, as they either do not fall within Flood Zones 2 or 3 or less than 25% of their area falls within Flood Zones 2 or 3. The effects for sites TLP_10 and TLP_11 are recorded as uncertain, due to the fact these sites cover large areas and so it is unknown where in each site the pitches would be located, and which could include an area that falls within Flood Zones 2 or 3.

4.37 Sites TLP_05, TLP_10 and TLP_11 are expected to have major negative effects against criterion *17b Surface water flood risk*, as they contain land at high risk from surface water flooding. Sites TLP_10 and TLP_11 cover large areas and so it is unknown where in each site the pitches would be located. They could, for example, be located in an area not at risk of surface water flooding. Therefore, the major negative effects are recorded as uncertain for these two sites. Sites TLP_01, TLP_07 and TLP_09 are expected to have minor negative effects as they contain land at medium risk from surface water flooding. The remaining sites are expected to have negligible effects against this criterion as they do not contain any land with a high or medium risk of surface water flooding.

4.38 For the reasons outlined above, sites TLP_05, TLP_10 and TLP_11 are expected to have significant negative effects overall in relation to IIA objective 17, while sites TLP_01, TLP_07 and TLP_09 are expected to have minor negative effects. The remaining sites are expected to have negligible effects. The significant negative effects for sites TLP_10 and TLP_11 are recorded as uncertain, as both sites cover large areas and so it is unknown where in each of these sites the pitches would be located.

IIA objective 18: Minimise water use and protect water quality

4.39 Sites TLP_01, TLP_08, TLP_09, TLP_10 and TLP_11 are expected to have major negative effects against criterion *18a Water quality* as they contain a watercourse or water body (TLP_10 and TLP_11) or fall within a Source Protection Zone (TLP_01, TLP_08, TLP_09). The major negative effects for sites TLP_10 and TLP_11 are recorded as uncertain, as both sites cover large areas and it is unknown where in each of these sites the pitches would be located (i.e. close to a watercourse/water body or not). This could affect water quality during construction, although the extent to which water quality is affected would also depend on construction techniques and the use of SuDS within the design.

4.40 For the reasons outlined above, sites TLP_01, TLP_08, TLP_09, TLP_10 and TLP_11 are expected to have significant negative effects overall in relation to IIA objective 18, while the remaining sites are expected to have negligible effects. The significant negative effects for sites TLP_10 and TLP_11 are recorded as uncertain, as both sites cover large areas and so it is unknown where in each of these sites the pitches would be located.

Chapter 5

Integrated Impact Assessment findings for the Traveller Local Plan policies

5.1 This chapter presents the IIA findings for the two policies contained within the Traveller Local Plan:

- Policy TLP1: Sites for Travellers; and
- Policy TLP2: Design and Site Layout.

5.2 Any related recommendations on mitigating negative effects or enhancing positive effects are provided in **Chapter 8**.

Policy TLP1: Sites for Travellers

5.3 Policy TLP1: Sites for Travellers allocates five sites and refers to Appendix B of the Traveller Local Plan, which contains a proforma for three of the five sites setting out key design and delivery requirements. According to Policy TLP1, these proformas carry the status of policy. As such, our appraisal of Policy TLP1 has been split into five separate tables – one for each of the site allocations – so as to take into account any site-specific mitigation. The policy-off effects (i.e. mitigation has not been taken into account) of each site are provided in the second column of each table and duplicate the effects for the corresponding site option described in **Chapter 4**. The likely sustainability effects of Policy TLP1, referred to as policy-on effects (i.e. mitigation has been taken into account), are set out in the final column of each table. The appraisal text below each table considers the combined 'policy-off' effects of each individual site before considering whether the requirements of Policy TLP1 and the proformas contained within Appendix B of the Traveller Local Plan modify these effects.

5.4 There are no proformas for Chase Park (TLP_10) and Crews Hill (TLP_11), as it is unknown at this stage where in each site pitches would be provided and so site-specific mitigation cannot yet be identified. The assessed effects for these individual allocations therefore remain the policy-off effects identified in **Chapter 4**. As such, they are not comparable with those for the other three allocated sites and many of the potential negative effects identified below for TLP_10 and TLP_11 may be mitigated through the masterplanning processes for these placemaking areas, and in due course at the Development Management stage, once the Council has determined which placemaking area will deliver the remaining permanent pitch requirement (taking into account the factors set out in criterion 4 of Policy TLP1).

5.5 As described in **Chapter 6**, a number of the potential negative effects identified by the assessment of site allocations in isolation are likely to be mitigated when the policies of the Traveller Local Plan and Enfield Local Plan are considered together.

Table 5.1 IIA findings for Policy TLP1, site TLP_01 Bulls Cross Nursery

IIA objective	Policy-off	Policy-on
	TLP_01	Policy TLP1
IIA1: Climate change mitigation	N/A	0
IIA2: Climate change adaptation	N/A	0
IIA3: Pitches	++	++
IIA4: Health and wellbeing	+	+
IIA5: Services and facilities	++	++
IIA6: Social inclusion	-?	-?
IIA7: Crime and community safety	N/A	0
IIA11: Air pollution	-	-

IIA objective	Policy-off	Policy-on
	TLP_01	Policy TLP1
IIA12: Sustainable transport	--	--
IIA13: Biodiversity and geodiversity	--	-
IIA14: Historic environment	--?	-?
IIA15: Landscape and townscape	--?	-?
IIA16: Efficient use of land	-	-
IIA17: Flooding	-	-
IIA18: Water	--	--

5.6 IIA objectives 1: Climate change mitigation and 2: Climate change adaptation were scoped out of the site appraisal work (see **Chapter 4**) because the location of sites will not significantly affect the achievement of these objectives. As Policy TLP1 does not contain any wording on climate change mitigation or adaptation, it is expected to have negligible effects in relation to IIA objectives 1 and 2.

5.7 Site TLP_01 is expected to provide a minimum of eight pitches. As such, it is expected to have a significant positive effect in relation to **IIA objective 3: Pitches** in the site appraisal work. Therefore, Policy TLP1/TLP_01 is expected to have a significant positive effect in relation to IIA objective 3.

5.8 Site TLP_01 receives a minor positive effect in relation to **IIA objective 4: Health and wellbeing** in the site appraisal work, as although it is not close to a GP surgery, it is within close proximity of areas of open space, walking and cycling routes and so could encourage outdoor recreation and physical exercise with positive effects on people's health and wellbeing. Policy TLP1 and the proforma for site TLP_01 do not contain any mitigation in terms of access to GP surgeries. Therefore, Policy TLP1/TLP_01 is expected to have a minor positive effect in relation to IIA objective 4.

5.9 Site TLP_01 received a significant positive effect in relation to **IIA objective 5: Services and facilities** in the site appraisal work, as it is within close proximity of at least one primary school and one secondary school. Therefore, Policy TLP1/TLP_01 is expected to have a significant positive effect in relation to IIA objective 5.

5.10 Site TLP_01 received a minor negative effect in relation to **IIA objective 6: Social inclusion**, as it is outside of an existing or planned new community and so could hinder social integration between travelling and settled communities. The effect is recorded as uncertain as despite this, there is still some potential for social cohesion issues between travelling and settled communities. Due to the fact Policy TLP1/TLP_01 which allocates the site does not contain any further wording on this, it is expected to have a minor negative effect in relation to IIA objective 6, with some uncertainty.

5.11 IIA objective 7: Crime and community safety was scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. As Policy TLP1 allocates five sites and does not contain any wording on crime and community safety, it is expected to have a negligible effect in relation to IIA objective 7.

5.12 Site TLP_01 received a minor negative effect in relation to **IIA objective 11: Air pollution** in the site appraisal work, as the current mean annual concentration of NO₂ and PM_{2.5} at the site exceeds the 2021 WHO guidelines. Due to the fact Policy TLP1 does not contain any wording on mitigating air pollution, it (together with the proforma for site TLP_01) is expected to have a minor negative effect in relation to IIA objective 11.

5.13 Site TLP_01 received a significant negative effect in relation to **IIA objective 12: Sustainable transport** in the site appraisal work as it falls within the lowest PTAL rating category (0, 1a, or 1b) and is within 401-800m of a local centre. Therefore, it has relatively (in a London context) very poor connectivity to public transport and so is unlikely to support modal shift, and may require residents to travel some distance to reach services and facilities. As Policy TLP1 does not contain any wording on mitigating the poor access to public transport and proximity to services and facilities, it (together with the proforma for site TLP_01) is expected to have a significant negative effect in relation to IIA objective 12.

5.14 Site TLP_01 received a significant negative effect in relation to **IIA objective 13: Biodiversity and geodiversity** in the site appraisal work, as it intersects a Priority Habitat (deciduous woodland). However, the proforma for site TLP_01 states that development of the site must maximise the retention of existing trees and minimise the impact on retained trees, in addition to retaining and enhancing boundary planting. Therefore, the significant negative effect is upgraded and Policy TLP1/TLP_01 receives a minor negative effect in relation to IIA objective 13.

5.15 Site TLP_01 received a significant negative effect in relation to **IIA objective 14: Historic environment** in the site appraisal work, as it is within close proximity of heritage assets and so the siting of pitches could have adverse effects on the settings of these heritage assets. The effect is recorded as uncertain in the absence of a heritage impact assessment although the site proforma notes a range of heritage considerations. However, the proforma for site TLP_01 states that development of the site must demonstrate how it conserves and enhances the historic environment. Therefore, the significant negative effect is upgraded and Policy TLP1/TLP_01 receives a minor negative effect in relation to IIA objective 14, with uncertainty.

5.16 Site TLP_01 received a significant negative effect in relation to **IIA objective 15: Landscape and townscape** in the site appraisal work, as the siting of pitches could have adverse effects on the landscape and townscape. The effect is recorded as uncertain in the absence of a landscape character assessment. However, the proforma for site TLP_01 states that development of the site must retain and/or enhance boundary planting to ensure views into the site are minimised. Additionally, it states that the existing railings at the entrance to the site must be retained, recognising the contribution they make to the character of the street scene. Therefore, the significant negative effect is upgraded and Policy TLP1/TLP_01 receives a minor negative effect in relation to IIA objective 15, with some uncertainty.

5.17 Site TLP_01 received a minor negative effect in relation to **IIA objective 16: Efficient use of land**, as it is greenfield and comprises Grade 3 agricultural land. In terms of waste, which is not addressed in the site appraisal work, Policy TLP1 requires wastewater infrastructure, in addition to waste storage, disposal and collection. Overall, Policy TLP1/TLP_01 is expected to have a minor negative effect in relation to IIA objective 16.

5.18 Site TLP_01 received a minor negative effect in relation to **IIA objective 17: Flooding**, as it contains land with a medium chance of surface water flooding. Due to the fact Policy TLP1/TLP_01 does not contain any mitigation in relation to flood risk, it is expected to have a minor negative effect overall in relation to IIA objective 17.

5.19 Site TLP_01 received a significant negative effect in relation to **IIA objective 18: Water**, as it falls within a Source Protection Zone. This could affect water quality during construction, although the extent to which water quality is affected would also depend on construction techniques and the use of SuDS within the design. Due to the fact Policy TLP1 does not provide any mitigation in terms of water quality, it together with the proforma for site TLP_01 is expected to have a significant negative effect in relation to IIA objective 18.

Table 5.2 IIA findings for Policy TLP1, site TLP_03 Land adjacent to Ridgeway

IIA objective	Policy-off	Policy-on
	TLP_03	Policy TLP1
IIA1: Climate change mitigation	N/A	0
IIA2: Climate change adaptation	N/A	0
IIA3: Pitches	++	++
IIA4: Health and wellbeing	-	-
IIA5: Services and facilities	-	-
IIA6: Social inclusion	-?	-?
IIA7: Crime and community safety	N/A	0
IIA11: Air pollution	-	-

IIA objective	Policy-off	Policy-on
	TLP_03	Policy TLP1
IIA12: Sustainable transport	--	--
IIA13: Biodiversity and geodiversity	-	0
IIA14: Historic environment	--?	--?
IIA15: Landscape and townscape	--?	-?
IIA16: Efficient use of land	-	-
IIA17: Flooding	0	0
IIA18: Water	0	0

5.20 IIA objectives 1: Climate change mitigation and 2: Climate change adaptation were scoped out of the site appraisal work (see **Chapter 4**) because the location of sites will not significantly affect the achievement of these objectives. As Policy TLP1 does not contain any wording on climate change mitigation or adaptation, it is expected to have negligible effects in relation to IIA objectives 1 and 2.

5.21 Site TLP_03 is expected to provide a minimum of 12 pitches. As such, it is expected to have a significant positive effect in relation to **IIA objective 3: Pitches** in the site appraisal work. Therefore, Policy TLP1/TLP_03 is expected to have a significant positive effect in relation to IIA objective 3.

5.22 Site TLP_03 receives a minor negative effect in relation to **IIA objective 4: Health and wellbeing** in the site appraisal work, as it is not within close proximity of a GP surgery or walking and cycling routes, and experiences noise pollution. Policy TLP1 and the proforma for site TLP_03 do not contain any mitigation in terms of access to GP surgeries, walking and cycling routes, and noise. Therefore, Policy TLP1/TLP_03 is expected to have a minor negative effect in relation to IIA objective 4.

5.23 Site TLP_03 received a minor negative effect in relation to **IIA objective 5: Services and facilities** in the site appraisal work, as it is not within close proximity of a primary or secondary school. Therefore, Policy TLP1/TLP_03 is expected to have a minor negative effect in relation to IIA objective 5.

5.24 Site TLP_03 received a minor negative effect in relation to **IIA objective 6: Social inclusion**, as it is outside of an existing or planned new community and so could hinder social integration between travelling and settled communities. The effect is recorded as uncertain as despite this, there is still some potential for social cohesion issues between travelling and settled communities. Due to the fact Policy TLP1/TLP_03 which allocates the site does not contain any further wording on this, it is expected to have a minor negative effect in relation to IIA objective 6, with some uncertainty.

5.25 IIA objective 7: Crime and community safety was scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. As Policy TLP1 allocates five sites and does not contain any wording on crime and community safety, it is expected to have a negligible effect in relation to IIA objective 7.

5.26 Site TLP_03 received a minor negative effect in relation to **IIA objective 11: Air pollution** in the site appraisal work, as the current mean annual concentration of NO₂, PM₁₀ and PM_{2.5} at the site exceeds the 2021 WHO guidelines. Due to the fact Policy TLP1 does not contain any wording on mitigating air pollution, it (together with the proforma for site TLP_03) is expected to have a minor negative effect in relation to IIA objective 11.

5.27 Site TLP_03 received a significant negative effect in relation to **IIA objective 12: Sustainable transport** in the site appraisal work as it falls within the lowest PTAL rating category (0, 1a, or 1b) and is not within close proximity of a major, district or local centre, and so residents would need to travel some distance to reach services and facilities. Therefore, it has relatively (in a London context) very poor connectivity to public transport and so is unlikely to support modal shift, and is likely to require residents to travel some distance to reach services and facilities. While the site proforma requires safe pedestrian access to be provided to the existing bus stops on the Ridgeway, this is not judged sufficient to alter the policy-off significant negative effect in relation to IIA objective 12.

5.28 Site TLP_03 received a minor negative effect in relation to **IIA objective 13: Biodiversity and geodiversity** in the site appraisal work, as it is within 250m of Priority Habitats (mainly deciduous woodland and a traditional orchard) and a Site of Importance for Nature Conservation (Plumridge Wood). The proforma for site TLP_03 states that development of the site must maximise the retention of existing trees and minimise the impact on retained trees, in addition to minimising loss of hedgerows and established planting within the site. It further requires the implementation of measures to enhance biodiversity on remaining undeveloped parts of the site. Therefore, the minor negative effect is upgraded and Policy TLP1/TLP_03 receives a negligible effect in relation to IIA objective 13.

5.29 Site TLP_03 received a significant negative effect in relation to **IIA objective 14: Historic environment** in the site appraisal work, as it is within close proximity of heritage assets and so the siting of pitches could have adverse effects on the settings of these heritage assets. The effect is recorded as uncertain in the absence of a heritage impact assessment. The proforma for site TLP_03 does not outline any mitigation in relation to the historic environment and so Policy TLP1/TLP_03 receives a significant negative effect in relation to IIA objective 14, with uncertainty.

5.30 Site TLP_03 received a significant negative effect in relation to **IIA objective 15: Landscape and townscape** in the site appraisal work, as the siting of pitches could have adverse effects on the landscape and townscape. The effect is recorded as uncertain in the absence of a landscape character assessment. However, the proforma for site TLP_03 states that development of the site must retain and enhance the landscape character, with particular consideration given to the views from the south. Additionally, it states that the site's boundary planting should be retained and enhanced to protect the privacy of the site's occupants. Therefore, the significant negative effect is upgraded and Policy TLP1/TLP_03 receives a minor negative effect in relation to IIA objective 15, with uncertainty.

5.31 Site TLP_03 received a minor negative effect in relation to **IIA objective 16: Efficient use of land**, as it is greenfield and comprises Grade 3 agricultural land. In terms of waste, which is not addressed in the site appraisal work, Policy TLP1 requires wastewater infrastructure, in addition to waste storage, disposal and collection. Overall, Policy TLP1/TLP_03 is expected to have a minor negative effect in relation to IIA objective 16.

5.32 Site TLP_03 received negligible effects in relation to **IIA objectives 17: Flooding** and **18: Water**, as it is not at risk of flooding and unlikely to have any effect on water quality. Therefore, Policy TLP1/TLP_03 is expected to have negligible effects in relation to IIA objectives 17 and 18.

Table 5.3 IIA findings for Policy TLP1, site TLP_09 Land at A10

IIA objective	Policy-off	Policy-on
	TLP_09	Policy TLP1
IIA1: Climate change mitigation	N/A	0
IIA2: Climate change adaptation	N/A	0
IIA3: Pitches	++	++
IIA4: Health and wellbeing	0	+
IIA5: Services and facilities	++	++
IIA6: Social inclusion	-?	-?
IIA7: Crime and community safety	N/A	0
IIA11: Air pollution	-	-
IIA12: Sustainable transport	-	-
IIA13: Biodiversity and geodiversity	-	0
IIA14: Historic environment	--?	--?

IIA objective	Policy-off	Policy-on
	TLP_09	Policy TLP1
IIA15: Landscape and townscape	--?	-?
IIA16: Efficient use of land	++?	++
IIA17: Flooding	-	-
IIA18: Water	--	--

5.33 IIA objectives 1: Climate change mitigation and 2: Climate change adaptation were scoped out of the site appraisal work (see **Chapter 4**) because the location of sites will not significantly affect the achievement of these objectives. As Policy TLP1 does not contain any wording on climate change mitigation or adaptation, it is expected to have negligible effects in relation to IIA objectives 1 and 2.

5.34 Site TLP_09 is expected to accommodate a minimum of 15 caravans. As such, it is expected to have a significant positive effect in relation to **IIA objective 3: Pitches** in the site appraisal work. Therefore, Policy TLP1/TLP_09 is expected to have a significant positive effect in relation to IIA objective 3.

5.35 Site TLP_09 receives a negligible effect in relation to **IIA objective 4: Health and wellbeing** in the site appraisal work, as although it is within close proximity of a GP surgery and open space and so people have access to healthcare and recreational opportunities, it experiences major noise issues and comprises Metropolitan Open Land, which could be lost as a result of the placing of caravans. However, Policy TLP1 and the proforma for site TLP_09 requires development to explore opportunities to mitigate noise impacts from the A10, which could have beneficial effects on people's wellbeing. Additionally, it requires the pedestrian route between Edmonton Cemetery and the A10 to be maintained. Although the skate park in the site would be lost to caravans, the proforma requires an alternative skate park to be provided within close proximity of the site and to at least equivalent standard. The site proforma also requires use of the existing building on site to create a shared amenity block. Taking all of this into account, the negligible effect is upgraded to a minor positive effect for Policy TLP1/TLP_09, in relation to IIA objective 4.

5.36 Site TLP_09 received a significant positive effect in relation to **IIA objective 5: Services and facilities** in the site appraisal work, as it is within close proximity of at least one primary school and one secondary school. Therefore, Policy TLP1/TLP_09 is expected to have a significant positive effect in relation to IIA objective 5.

5.37 Site TLP_9 received a minor negative effect in relation to **IIA objective 6: Social inclusion**, as it is outside of an existing or planned new community and so could hinder social integration between travelling and settled communities. The effect is recorded as uncertain as despite this, there is still some potential for social cohesion issues between travelling and settled communities. Due to the fact Policy TLP1/TLP_09 which allocates the site does not contain any further wording on this, it is expected to have a minor negative effect in relation to IIA objective 6, with some uncertainty.

5.38 IIA objective 7: Crime and community safety was scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. As Policy TLP1 allocates five sites and does not contain any wording on crime and community safety, it is expected to have a negligible effect in relation to IIA objective 7.

5.39 Site TLP_09 received a minor negative effect in relation to **IIA objective 11: Air pollution** in the site appraisal work, as the current mean annual concentration of NO₂, PM₁₀ and PM_{2.5} at the site exceeds the 2021 WHO guidelines, while concentrations of NO₂ also exceed the higher pollution levels allowed under the UK's national air quality objectives. Due to the fact Policy TLP1 does not contain any wording on mitigating air pollution, it (together with site TLP_09) is expected to have a minor negative effect in relation to IIA objective 11.

5.40 Site TLP_09 received a minor negative effect in relation to **IIA objective 12: Sustainable transport** in the site appraisal work as it falls within an area with a PTAL rating of 2, which is quite low, and is within 401-800m of a local centre. Therefore, it has relatively (in a London context) poor connectivity to public transport and so is unlikely to support modal shift, and may require residents to travel to reach services and facilities. As Policy TLP1 does not contain any wording on mitigating the poor

access to public transport and proximity to services and facilities, it (together with site TLP_09) is expected to have a minor negative effect in relation to IIA objective 12.

5.41 Site TLP_09 received a minor negative effect in relation to **IIA objective 13: Biodiversity and geodiversity** in the site appraisal work, as it is within 250m of Priority Habitats (deciduous woodland). The proforma for site TLP_09 states that development must enhance the boundaries to ensure improvements in local biodiversity. Therefore, the minor negative effect is upgraded and Policy TLP1/TLP_09 receives a negligible effect in relation to IIA objective 13.

5.42 Site TLP_09 received a significant negative effect in relation to **IIA objective 14: Historic environment** in the site appraisal work, as it is within close proximity of heritage assets and so the siting of caravans could have adverse effects on the settings of these heritage assets. The effect is recorded as uncertain in the absence of a heritage impact assessment. The proforma for site TLP_09 does not outline any mitigation in relation to the historic environment and so Policy TLP1/TLP_09 receives a significant negative effect in relation to IIA objective 14, with some uncertainty.

5.43 Site TLP_09 received a significant negative effect in relation to **IIA objective 15: Landscape and townscape** in the site appraisal work, as the siting of caravans could have adverse effects on the landscape and townscape. The effect is recorded as uncertain in the absence of a landscape character assessment. However, the proforma for site TLP_09 states that development of the site must enhance the boundaries to ensure an improved street scene, particularly along the A10 frontage. Therefore, the significant negative effect is upgraded and Policy TLP1/TLP_09 receives a minor negative effect in relation to IIA objective 15, with some uncertainty.

5.44 Site TLP_09 received a significant positive effect in relation to **IIA objective 16: Efficient use of land**, with some uncertainty, as it contains buildings on site that could possibly be converted for use by transit Travellers. The proforma for site TLP_09 states that development of the site must utilise the existing building on site to create a shared amenity block, removing any uncertainty. In terms of waste, which is not addressed in the site appraisal work, Policy TLP1 requires wastewater infrastructure, in addition to waste storage, disposal and collection. Overall, Policy TLP1/TLP_09 is expected to have a significant positive effect in relation to IIA objective 16.

5.45 Site TLP_09 received a minor negative effect in relation to **IIA objective 17: Flooding**, as it contains land with a medium chance of surface water flooding. Due to the fact Policy TLP1/TLP_09 does not contain any mitigation in relation to flood risk, it is expected to have a minor negative effect overall in relation to IIA objective 17.

Table 5.4 IIA findings for Policy TLP1, site TLP_10 Chase Park

IIA objective	Policy-off	Policy-on ²⁸
	TLP_10	Policy TLP1
IIA1: Climate change mitigation	N/A	0
IIA2: Climate change adaptation	N/A	0
IIA3: Pitches	++	+++?
IIA4: Health and wellbeing	+?	+?
IIA5: Services and facilities	+++?	+++?
IIA6: Social inclusion	+?	+?
IIA7: Crime and community safety	N/A	0
IIA11: Air pollution	-?	-?

²⁸ As noted earlier in this chapter, site TLP_10 and TLP_11 do not yet have site-specific policy requirements for Gypsy and Traveller provision in the form of site proformas, therefore the 'policy-on' effects for these allocations within Policy TLP1 are the broadly same as the 'policy-off' effects.

IIA objective	Policy-off	Policy-on ²⁸
	TLP_10	Policy TLP1
IIA12: Sustainable transport	0?	0?
IIA13: Biodiversity and geodiversity	--?	--?
IIA14: Historic environment	--?	--?
IIA15: Landscape and townscape	--?	--?
IIA16: Efficient use of land	++?	++?
IIA17: Flooding	--?	--?
IIA18: Water	--?	--?

5.46 IIA objectives 1: Climate change mitigation and 2: Climate change adaptation were scoped out of the site appraisal work (see **Chapter 4**) because the location of sites will not significantly affect the achievement of these objectives. As Policy TLP1 does not contain any wording on climate change mitigation or adaptation, it is expected to have negligible effects in relation to IIA objectives 1 and 2.

5.47 Site TLP_10 (or alternatively site TLP_11) is expected to provide at least ten pitches. As such, it is expected to have a significant positive effect in relation to **IIA objective 3: Pitches** in the site appraisal work. Therefore, Policy TLP1/TLP_10 is expected to have a significant positive effect in relation to IIA objective 3, with some uncertainty, as this longer-term need for permanent pitches could be met at either TLP_10 or TLP_11.

5.48 Site TLP_10 received a minor positive effect in relation to **IIA objective 4: Health and wellbeing** in the site appraisal work, as it is within close proximity of a GP surgery and areas of open space, walking and cycling routes, and so could encourage outdoor recreation and physical exercise with positive effects on people's health and wellbeing. The effect is recorded as uncertain, as it covers a large area and so it is unknown where in the site pitches would be located and therefore if Travellers would in fact be within close proximity of a GP surgery. Therefore, Policy TLP1/TLP_10 is expected to have a minor positive effect in relation to IIA objective 4, with some uncertainty.

5.49 Site TLP_10 received a significant positive effect in relation to **IIA objective 5: Services and facilities** in the site appraisal work, as it is within close proximity of at least one primary school and one secondary school. The effect is recorded as uncertain, as the site covers a large area and so it is unknown where in the site pitches would be located and therefore if Travellers would in fact be within close proximity of both a primary school and a secondary school. Therefore, Policy TLP1/TLP_10 is expected to have a significant positive effect in relation to IIA objective 5, with some uncertainty.

5.50 Site TLP_10 received a minor positive effect in relation to **IIA objective 6: Social inclusion**, as the pitches would be inside of a planned new community and so could contribute towards social inclusion and promotion of equality and respect through the creation of a sustainable, mixed community. The effect is recorded as uncertain as despite this, there is still some potential for social cohesion issues between travelling and settled communities. Due to the fact Policy TLP1/TLP_10 which allocates the site does not contain any further wording on this, it is expected to have a minor positive effect in relation to IIA objective 6, with some uncertainty.

5.51 IIA objective 7: Crime and community safety was scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. As Policy TLP1 allocates five sites and does not contain any wording on crime and community safety, it is expected to have a negligible effect in relation to IIA objective 7.

5.52 Site TLP_10 received a minor negative effect in relation to **IIA objective 11: Air pollution** in the site appraisal work, as the current mean annual concentration of NO₂, PM₁₀ and PM_{2.5} at the site exceeds the 2021 WHO guidelines. The current mean annual concentration of NO₂ also exceeds the higher pollution levels allowed under the UK's national air quality objectives. As it is unknown where in site TLP_10 the pitches would be located, it is uncertain whether the pitches would be within an area that exceeds said guidelines and objectives or not. Due to the fact Policy TLP1 does not contain any wording on mitigating air pollution, it is expected to have a minor negative effect in relation to IIA objective 11, with some uncertainty.

5.53 Site TLP_10 received a net negligible effect in relation to **IIA objective 12: Sustainable transport** in the site appraisal work because, while most of the site falls within a low PTAL rating category indicating relatively (in a London context) poor connectivity to sustainable transport, a small area in the south west of the site has slightly better connectivity; much of the site is also within easy walking distance of some Local Centres. As it is unknown where in the site pitches would be located, it is possible the pitches could be located in an area with a slightly lower PTAL rating or beyond easy walking distance of Local Centres. Therefore, the negligible effect is recorded as uncertain. Overall, Policy TLP1/TLP_10 is expected to have a negligible effect in relation to IIA objective 12, with some uncertainty.

5.54 Site TLP_10 received a significant negative effect in relation to **IIA objective 13: Biodiversity and geodiversity** in the site appraisal work, as it intersects Priority Habitats (deciduous woodland) and a Site of Importance for Nature Conservation (Royal Enfield Rifles Site and Woodland at Vicarage Farm). Due to the fact TLP_10 covers a large area and it is unknown where in the site the pitches would be located, it is unknown whether the pitches would intersect the biodiversity assets. Therefore, the significant negative effect is recorded as uncertain. As no mitigation is proposed, Policy TLP1/TLP_10 is expected to have a significant negative effect in relation to IIA objective 13, with some uncertainty.

5.55 Site TLP_10 received a significant negative effect in relation to **IIA objective 14: Historic environment** in the site appraisal work, as it is within close proximity of heritage assets and so the siting of pitches could have adverse effects on the settings of these heritage assets. The effect is recorded as uncertain in the absence of a heritage impact assessment. Therefore, Policy TLP1/TLP_10 is expected to have a significant negative effect in relation to IIA objective 14, with uncertainty.

5.56 Site TLP_10 received a significant negative effect in relation to **IIA objective 15: Landscape and townscape** in the site appraisal work, as the siting of pitches could have adverse effects on the landscape and townscape. The effect is recorded as uncertain in the absence of a landscape character assessment. As no mitigation is proposed by Policy TLP1, the policy together with site TLP_10 is expected to have a significant negative effect in relation to IIA objective 15, with some uncertainty.

5.57 Site TLP_10 received a significant positive effect in relation to **IIA objective 16: Efficient use of land**, as it contains buildings that could possibly be converted for Gypsy and Traveller use. As it is only a possibility that these buildings could be converted for Gypsy and Traveller use, the significant positive effect is recorded as uncertain. Overall, Policy TLP1/TLP_10 is expected to have a significant positive effect in relation to IIA objective 16, with some uncertainty.

5.58 Site TLP_10 received a significant negative effect in relation to **IIA objective 17: Flooding**, as it contains land with a high chance of surface water flooding. The effect is uncertain, as it is unknown where in the site the pitches would be located and therefore if they would fall within an area at risk of surface water flooding. Due to the fact Policy TLP1 does not contain any mitigation in relation to flood risk, it is expected to have a significant negative effect overall in relation to IIA objective 17, with some uncertainty.

5.59 Site TLP_10 received a significant negative effect in relation to **IIA objective 18: Water**, as it contains watercourses. This could affect water quality during construction, although the extent to which water quality is affected would also depend on construction techniques and the use of SuDS within the design. The effect is uncertain, as it is unknown where in site TLP_10 the pitches would be located and therefore if there is potential to contaminate the watercourses. Due to the fact Policy TLP1 does not provide any mitigation in terms of water quality, it is expected to have a significant negative effect in relation to IIA objective 18, with some uncertainty.

Table 5.5 IIA findings for Policy TLP1, site TLP_11 Crews Hill

IIA objective	Policy-off	Policy-on ²⁹
	TLP_11	Policy TLP1
IIA1: Climate change mitigation	N/A	0
IIA2: Climate change adaptation	N/A	0

²⁹ As noted earlier in this chapter, site TLP_10 and TLP_11 do not yet have site-specific policy requirements for Gypsy and Traveller provision in the form of site proformas, therefore the 'policy-on' effects for these allocations within Policy TLP1 are broadly the same as the 'policy-off' effects.

IIA objective	Policy-off	Policy-on ²⁹
	TLP_11	Policy TLP1
IIA3: Pitches	++	++?
IIA4: Health and wellbeing	+	+
IIA5: Services and facilities	++?	++?
IIA6: Social inclusion	+?	+?
IIA7: Crime and community safety	N/A	0
IIA11: Air pollution	-?	-?
IIA12: Sustainable transport	--	--
IIA13: Biodiversity and geodiversity	--?	--?
IIA14: Historic environment	--?	--?
IIA15: Landscape and townscape	--?	--?
IIA16: Efficient use of land	++?	++?
IIA17: Flooding	--?	--?
IIA18: Water	--?	--?

5.60 IIA objectives 1: Climate change mitigation and 2: Climate change adaptation were scoped out of the site appraisal work (see **Chapter 4**) because the location of sites will not significantly affect the achievement of these objectives. As Policy TLP1 does not contain any wording on climate change mitigation or adaptation, it is expected to have negligible effects in relation to IIA objectives 1 and 2.

5.61 Site TLP_11 (or alternatively site TLP_10) is expected to provide at least ten pitches. As such, it is expected to have a significant positive effect in relation to **IIA objective 3: Pitches** in the site appraisal work. Therefore, Policy TLP1/TLP_11 is expected to have a significant positive effect in relation to IIA objective 3, with some uncertainty, as this longer-term need for permanent pitches could be met at either TLP_10 or TLP_11.

5.62 Site TLP_11 received a minor positive effect in relation to **IIA objective 4: Health and wellbeing** in the site appraisal work, as although it is not within close proximity of a GP surgery, it is within close proximity of some areas of open space, walking and cycling routes, and so could encourage outdoor recreation and physical exercise with positive effects on people's health and wellbeing. Policy TLP1 does not contain any mitigation in terms of access to GP surgeries. Therefore, Policy TLP1/TLP_11 is expected to have a minor positive effect in relation to IIA objective 4.

5.63 Site TLP_11 received a significant positive effect in relation to **IIA objective 5: Services and facilities** in the site appraisal work, as it is within close proximity of at least one primary school and one secondary school. The effect is recorded as uncertain, as the site covers a large area and so it is unknown where in the site pitches would be located and therefore if Travellers would in fact be within close proximity of both a primary school and a secondary school. Therefore, Policy TLP1/TLP_11 is expected to have a significant positive effect in relation to IIA objective 5, with some uncertainty.

5.64 Site TLP_11 received a minor positive effect in relation to **IIA objective 6: Social inclusion**, as the pitches would be inside of a planned new community and so could contribute towards social inclusion and promotion of equality and respect through the creation of a sustainable, mixed community. The effect is recorded as uncertain as despite this, there is still some potential for social cohesion issues between travelling and settled communities. Due to the fact Policy TLP1/TLP_11 which allocates the site does not contain any further wording on this, it is expected to have a minor positive effect in relation to IIA objective 6, with some uncertainty.

5.65 IIA objective 7: Crime and community safety was scoped out of the site appraisal work because the location of sites will not significantly affect the achievement of this objective. As Policy TLP1 allocates five sites and does not contain any wording on crime and community safety, it is expected to have a negligible effect in relation to IIA objective 7.

5.66 Site TLP_11 received a minor negative effect in relation to **IIA objective 11: Air pollution** in the site appraisal work, as the current mean annual concentration of NO₂, PM₁₀ and PM_{2.5} at the site exceeds the 2021 WHO guidelines. The current mean annual concentration of NO₂ also exceeds the higher pollution levels allowed under the UK's national air quality objectives. As it is unknown where in site TLP_11 the pitches would be located, it is uncertain whether the pitches would be within an area that exceeds said guidelines and objectives or not. Due to the fact Policy TLP1 does not contain any wording on mitigating air pollution, it is expected to have a minor negative effect in relation to IIA objective 11, with some uncertainty.

5.67 Site TLP_11 received a significant negative effect in relation to **IIA objective 12: Sustainable transport** in the site appraisal work as it falls within the lowest PTAL rating category (0, 1a, or 1b) and is not within close proximity of a major, district or local centre. Therefore, Travellers would need to travel some distance to reach services and facilities. Overall, Policy TLP1/TLP_11 is expected to have a significant negative effect in relation to IIA objective 12, with some uncertainty.

5.68 Site TLP_11 received a significant negative effect in relation to **IIA objective 13: Biodiversity and geodiversity** in the site appraisal work, as it intersects a Priority Habitat and Site of Importance for Nature Conservation (Crews Hill to Bowes Park RAILSIDES, Crews Hill Golf Course and Glasgow Stud). Due to the fact TLP_11 covers a large area and it is unknown where in the site the pitches would be located, it is unknown whether the pitches would intersect the biodiversity assets. Therefore, the significant negative effect is recorded as uncertain. As no mitigation is proposed, Policy TLP1/TLP_11 is expected to have a significant negative effect in relation to IIA objective 13, with some uncertainty.

5.69 Site TLP_11 received a significant negative effect in relation to **IIA objective 14: Historic environment** in the site appraisal work, as it is within close proximity of heritage assets and so the siting of pitches could have adverse effects on the settings of these heritage assets. The effect is recorded as uncertain in the absence of a heritage impact assessment. Therefore, Policy TLP1/TLP_11 is expected to have a significant negative effect in relation to IIA objective 14, with uncertainty.

5.70 Site TLP_11 received a significant negative effect in relation to **IIA objective 15: Landscape and townscape** in the site appraisal work, as the siting of pitches could have adverse effects on the landscape and townscape. The effect is recorded as uncertain in the absence of a landscape character assessment. As no mitigation is proposed by Policy TLP1, the policy together with site TLP_11 is expected to have a significant negative effect in relation to IIA objective 15, with some uncertainty.

5.71 Site TLP_11 received a significant positive effect in relation to **IIA objective 16: Efficient use of land**, as it contains buildings that could possibly be converted for Gypsy and Traveller use. As it is only a possibility that these buildings could be converted for Gypsy and Traveller use, the significant positive effect is recorded as uncertain. Overall, Policy TLP1/TLP_11 is expected to have a significant positive effect in relation to IIA objective 16, with some uncertainty.

5.72 Site TLP_11 received a significant negative effect in relation to **IIA objective 17: Flooding**, as it contains land with a high chance of surface water flooding. The effect is uncertain, as it is unknown where in the site the pitches would be located and therefore if they would fall within an area at risk of surface water flooding. Due to the fact Policy TLP1 does not contain any mitigation in relation to flood risk, it is expected to have a significant negative effect overall in relation to IIA objective 17, with some uncertainty.

5.73 Site TLP_11 received a significant negative effect in relation to **IIA objective 18: Water**, as it contains watercourses. This could affect water quality during construction, although the extent to which water quality is affected would also depend on construction techniques and the use of SuDS within the design. The effect is uncertain, as it is unknown where in site TLP_11 the pitches would be located and therefore if there is potential to contaminate the watercourses. Due to the fact Policy TLP1 does not provide any mitigation in terms of water quality, it is expected to have a significant negative effect in relation to IIA objective 18, with some uncertainty.

Policy TLP2: Design and Site Layout

5.74 The likely sustainability effects of Policy TLP2 are set out in **Table 5.6** and described below the table.

Table 5.6 IIA findings for Policy TLP2: Design and Site Layout

IIA objective	Policy TLP2
IIA1: Climate change mitigation	+
IIA2: Climate change adaptation	+
IIA3: Pitches	+
IIA4: Health and wellbeing	++
IIA5: Services and facilities	++
IIA6: Social inclusion	+
IIA7: Crime and community safety	+
IIA11: Air pollution	0
IIA12: Sustainable transport	+
IIA13: Biodiversity and geodiversity	+
IIA14: Historic environment	+
IIA15: Landscape and townscape	+
IIA16: Efficient use of land	+
IIA17: Flooding	+
IIA18: Water	+

5.75 Policy TLP2: Design and Site Layout requires planning applications for Traveller sites to explore opportunities to improve existing walking and cycling routes to encourage sustainable forms of travel. Therefore, a minor positive effect is expected in relation to **IIA objective 12: Sustainable transport**. This may help minimise private car use and associated greenhouse gas emissions. With regard to the built environment, the policy requires community buildings and site manager offices to use sustainable design and construction methods, which should help minimise carbon emissions associated with the construction of these buildings and the energy needed to heat, cool and power them, helping mitigate climate change. Therefore, a minor positive effect is expected in relation to **IIA objective 1: Climate change mitigation**.

5.76 Policy TLP2 requires planning applications to provide surface water drainage incorporating Sustainable Drainage Systems (SuDS) where possible, in addition to wastewater infrastructure. This will help mitigate against an increased risk of flooding as a result of climate change, while wastewater infrastructure will help prevent water contamination and protect water quality during flooding events. There is also a requirement within the policy for there to be minimum separation distances between caravans to help minimise fire risk. This is particularly important considering the increase in the number of wildfires in England due to rising temperatures and drier conditions driven by climate change. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 2: Climate change adaptation**.

5.77 Policy TLP2 sets out the design requirements for Gypsy and Traveller sites, which will help ensure that high quality sites are provided that include amenity/utility buildings where required. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 3: Pitches**.

5.78 Policy TLP2 requires proposals to include open space, including a communal green space with provision for children's play space, which should be in an overlooked area. Therefore, residents will have access to an open space and children access to a play space, which will encourage outdoor recreation and physical exercise. The policy also requires proposals to explore opportunities to improve existing walking and cycling routes. This will have beneficial effects on people's physical health and

mental wellbeing. Further to this, Policy TLP2 requires all permanent pitches to include a private garden to the rear of each pitch, ensuring residents have access to their own outdoor private space. Proposals must also provide details of wastewater infrastructure. According to Policy TLP2, permanent pitches must include storage space and an amenity building with a living room, kitchen and WC. Likewise, transit pitches must include a utility building with W/C, utility room, kitchen and living room. All of these requirements will ensure Gypsies, Travellers and Travelling Showpeople have good access to utilities. In terms of noise and light pollution, the policy seeks to embed noise mitigation measures into site design and minimise external lighting to avoid a detrimental impact on the surrounding locality. Lastly, there is a requirement for planning applications to demonstrate effective engagement with the Gypsy and Traveller community during the design process. This will help ensure any thoughts they have on the design of a site are considered, with beneficial effects on their wellbeing. Therefore, overall, Policy TLP2 is expected to have a significant positive effect in relation to **IIA objective 4: Health and wellbeing**.

5.79 In addition to a communal green space, Policy TLP2 requires sites to include a community building where required. Although it is not clear what the community buildings will be used for, a communal space will be provided that can be used for a range of activities such as education. Therefore, Policy TLP2 is expected to have a significant positive effect in relation to **IIA objective 5: Services and facilities**.

5.80 Policy TLP2 requires planning applications for Traveller sites to demonstrate effective engagement with the Gypsy and Traveller community during the design process, ensuring they are involved in the process. Additionally, it requires planning applications to demonstrate that the proposed site layout is accessible and adaptable to suit a range of users, including disabled people, older people and families with young children. Lastly, the policy requires the inclusion of a communal green space and community building – both of which could provide opportunities for social interaction and facilitate access to community services. Overall, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 6: Social inclusion**.

5.81 The provision of a communal green space containing a children's play space in an overlooked area is likely to improve safety. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 7: Crime and community safety**.

5.82 Policy TLP2 requires sites and the layout of sites to not cause harm to the significance of biodiversity interests. This will help avoid and/or mitigate against the effects the provision of pitches or a transit site could have on valued habitats and ecological networks. Further to this, the provision of a communal green space may reduce recreational pressure on nearby green spaces. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 13: Biodiversity and geodiversity**.

5.83 Policy TLP2 requires sites and the layout of sites to not cause harm to the significance or setting of heritage assets. Therefore, a minor positive effect is expected in relation to **IIA objective 14: Historic environment**.

5.84 The effect pitches or transit sites could have on the landscape is expected to be limited, as only a small amount of built development would likely take place – in the form of a utility/storage/amenity or community building depending on the site. However, the presence of caravans could adversely affect the landscape. Policy TLP2 requires the provision of green buffers to the street and the site perimeter to reinforce the boundary of the site and to provide screening of views into/out of the site. Further to this, the provision of a communal green space may help enhance the landscape. According to the policy, existing boundaries should be utilised and enhanced where feasible, while boundary treatments should be avoided that would have a detrimental visual impact on the character of the site and locality. Overall, therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 15: Landscape and townscape**.

5.85 According to Policy TLP2, waste should be stored appropriately for disposal and collection. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 16: Efficient use of land**.

5.86 Policy TLP2 requires surface water drainage incorporating SuDS where possible, which will help mitigate flood risk. Therefore, Policy TLP2 is expected to have a minor positive effect in relation to **IIA objective 17: Flooding**.

5.87 Policy TLP2 requires details of wastewater infrastructure to be provided. This will help protect water from any form of contamination and so a minor positive effect is expected in relation to **IIA objective 18: Water**.

Chapter 6 Cumulative effects

6.1 This chapter considers the total effects of the Traveller Local Plan as a whole and the potential for these to combine with external effects. It begins by presenting the total effects of all of the policies in the Traveller Local Plan in **Table 6.1**. This is followed by a discussion on the likely cumulative and synergistic effects of the Local Plan on each of the IIA objectives. The cumulative effects of the Traveller Local Plan are presented in **Table 6.2**. Unless otherwise stated, the effects are assumed to be long-term and permanent.

6.2 It is important to note that Enfield Council submitted the Publication version of the Local Plan to the Secretary of State for independent examination in August 2024. The emerging Local Plan, once adopted, will form part of the Development Plan for Enfield together with the Traveller Local Plan (adoption anticipated in 2025/26), in addition to the London Plan 2021, North London Waste Plan (2022) and any 'made' neighbourhood plans. There are numerous policies in the Publication Local Plan that will work alongside the policies contained within the Traveller Local Plan to help reduce or avoid any potential negative sustainability effects as a result of the siting of pitches and new transit site. In this way, Local Plan policies may serve to mitigate negative cumulative effects of the Traveller Local Plan identified in this chapter.

Table 6.1 Total effects of the Traveller Local Plan

	IIA1: Climate change mitigation	IIA2: Climate change adaptation	IIA3: Pitches	IIA4: Health and wellbeing	IIA5: Services and facilities	IIA6: Social inclusion	IIA7: Crime and community safety	IIA11: Air pollution	IIA12: Sustainable transport	IIA13: Biodiversity	IIA14: Historic environment	IIA15: Landscape and townscape	IIA16: Efficient use of land and materials	IIA17: Flooding	IIA18: Water
Policy TLP1: Sites for Travellers – allocated sites with proformas															
TLP_01: Bulls Cross Nursery	0	0	++	+	++	-?	0	-	--	-	-?	-?	-	-	--
TLP_03: Land adjacent to Ridgeway	0	0	++	-	-	-?	0	-	--	0	--?	-?	-	0	0
TLP_09: Land at A10	0	0	++	+	++	-?	0	-	-	0	--?	-?	++	-	--
Policy TLP1: Sites for Travellers – one of two to be allocated; no proformas ³⁰															
TLP_10: Chase Park, or	0	0	++?	+	++?	+	0	-?	0?	--?	--?	--?	++?	--?	--?
TLP_11: Crews Hill	0	0	++?	+	++?	+	0	-?	--	--?	--?	--?	++?	--?	--?
Policy TLP2: Design and Site Layout	+	+	+	++	++	+	+	0	+	+	+	+	+	+	+

³⁰ As noted earlier in this chapter, site TLP_10 and TLP_11 do not yet have site-specific policy requirements for Gypsy and Traveller provision in the form of site proformas, therefore the 'policy-on' effects for these allocations within Policy TLP1 are broadly the same as their 'policy-off' effects and are not directly comparable with the Policy TLP1 effects identified for sites TLP_01, TLP_03 and TLP_09.

6.3 This section details the likely cumulative effects of the Traveller Local Plan on each of the IIA objectives. Cumulative effects are all of the effects of the Traveller Local Plan, plus other actions including people's behaviour and other underlying trends, while synergistic effects are a subset of cumulative effects where effects interact to produce a total effect greater than the sum of the individual effects. Unless otherwise stated, the effects are assumed to be long-term and permanent.

IIA objective 1: Ensure the Traveller Local Plan helps Enfield become a carbon neutral borough by 2040

6.4 The Traveller Local Plan will provide at least 30 pitches and one transit site in the plan period to 2041. This number of pitches and the transit site are unlikely to significantly contribute towards carbon emissions in the borough. The Traveller Local Plan does not contain any significant mitigation measures for helping ensure Enfield becomes a carbon neutral borough, although Policy TLP2 requires community buildings and site manager offices to use sustainable design and construction methods. There are regulations in place that seek to reduce emissions, namely the amended Building Regulations 2010 and Future Building Standard from 2025 that require CO₂ emissions from buildings to be 30% lower than current standards. These will help ensure any ancillary buildings provided at each site do not contribute significantly towards carbon emissions.

6.5 The Traveller Local Plan does not currently contain any mitigation in terms of reducing emissions from transport, and the allocated sites have generally poor access to public transport and so are unlikely to support modal shift. However, Policy TLP2 requires planning applications to explore opportunities to improve existing walking and cycling routes to encourage sustainable forms of travel, which may help minimise private car use and associated greenhouse gas emissions. Additionally, the expansion of the Ultra Low Emission Zone and shift to electric vehicles may help reduce emissions associated with petrol and diesel vehicles.

6.6 Overall, the Traveller Local Plan is expected to have a negligible (0) cumulative effect in relation to IIA objective 1.

IIA objective 2: 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

6.7 The Traveller Local Plan allocates a limited number of sites and so it is limited in what it can do to adapt to the effects of climate change, as it will not result in considerable new build development. Any buildings that are constructed, such as a utility building, could be developed in a way that is resilient to the effects of climate change. Only a small proportion (less than 25%) of some of the allocated sites fall within Flood Zones 2 or 3. However, four of the five allocated sites (TLP_01, TLP_09, TLP_10 and TLP_11) contain land at risk of surface water flooding. Policy TLP2: Design and Site Layout in the Traveller Local Plan requires proposals to provide surface water drainage incorporating SuDS where possible, in addition to wastewater infrastructure, which will help mitigate against flood risk and any contamination during flooding events. The policy also requires minimum separation distances between caravans to help minimise fire risk, which is particularly important considering the increase in the number of wildfires in England as a result of climate change.

6.8 Overall, the Traveller Local Plan is expected to have a minor positive (+) cumulative effect in relation to IIA objective 2.

IIA objective 3: Deliver the sites needed to meet the accommodation needs of Gypsies and Travellers, supporting an appropriate mix of permanent sites and transit sites

6.9 The Traveller Local Plan will provide at least 30 pitches and one transit site over the plan period and so will meet both the pitch and transit need identified in the GTAA. This will be achieved through the allocation of sites TLP_01, TLP_03, and TLP_10 or TLP_11 for permanent pitches and site TLP_09 for plots/transit provision.

6.10 Overall, the Traveller Local Plan is expected to have a significant positive (++) cumulative effect in relation to IIA objective 3.

IIA objective 4: Improve the physical and mental health and wellbeing of Gypsies, Travellers and Travelling Showpeople, while also reducing health inequalities between travelling and settled communities

6.11 All of the allocated sites with the exception of TLP_03 are within 800m of an open space and 400m of a walking or cycling path; site TLP_03 is within 800m of an open space but not within 400m of a walking or cycling path. Site TLP_09 is designated as Metropolitan Open Land and so its use as a transit site would result in the loss of existing open space, however the skate park would be re-provided within close proximity of the site and to at least equivalent standard. Policy TLP2 requires proposals

to include a communal green space with provision for children's play space. Therefore, residents would have easy access to open space, which is likely to encourage outdoor recreation and physical exercise. Likewise, the policy also requires proposals to explore opportunities to improve existing walking and cycling routes. This will have beneficial effects on people's physical health and mental wellbeing. Additionally, Policy TLP2 requires all permanent pitches to include a private garden to the rear of each pitch, ensuring residents have access to their own outdoor private space. Significant development is proposed at Chase Park and Crews Hill in Enfield's emerging Local Plan and these two areas (TLP_10 and TLP_11) have been allocated a pitch requirement to meet longer-term needs. If pitches are delivered at these sites, it is expected that their existing access to open space will be further enhanced in the long-term, as a result of the green infrastructure requirements of Local Plan site allocation policies PL10 Chase Park and PL11 Crews Hill.

6.12 Three of the allocated sites (TLP_03, TLP_09 and TLP_11) experience noise pollution, with site TLP_09 requiring noise mitigation before it can be used. However, Policy TLP2 seeks to embed noise mitigation measures into site design. It also seeks to minimise external lighting, to avoid detrimental impacts on the surrounding locality which should protect residential amenity. This will help protect people's wellbeing.

6.13 According to Policy TLP2, permanent pitches must include an amenity building with a living room, kitchen and WC. Likewise, transit pitches must include a utility building with W/C, utility room, kitchen and a living room. All of these requirements will ensure Gypsies, Travellers and Travelling Showpeople have good access to utilities.

6.14 In terms of access to healthcare, only two of the sites (TLP_09 and TLP_10) are within close proximity of an existing GP surgery.

6.15 It is possible that the negative effects noted above may be further mitigated to some degree by emerging Local Plan policies, including SP SC1: Improving Health and Wellbeing of Enfield's Diverse Communities, SC2: Protecting and Enhancing Social and Community Infrastructure and SP BG1: Enfield's Blue and Green Infrastructure Network, although these may be subject to change.

6.16 Overall, the Traveller Local Plan is expected to have a mixed minor positive and minor negative (+/-) cumulative effect in relation to IIA objective 4.

IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing travelling communities, mindful of the potential for community needs to change over time

6.17 Policy TLP2 requires proposals to include a communal green space with provision for a children's play space, in addition to a community building where required. Although it is not clear what the community building would be used for, a communal space will be provided that can be used for a range of activities such as education. Further to this, four of the five allocated Traveller Local Plan sites are within close proximity of both a primary school and a secondary school.

6.18 It is noted that Chase Park (TLP_10) and Crews Hill (TLP_11) which are allocated a pitch requirement, will likely have relatively good access to services, facilities and wider community infrastructure in the long-term, as a result of the large-scale development proposed at these locations in the emerging Local Plan. Policies PL10 (Chase Park) and PL11 (Crews Hill) in the emerging Local Plan allocate mixed use development at each site and the provision of one primary school at Chase Park and two primary schools at Crews Hill, which have sufficient capacity to co-locate early years and/or nursery facilities, in addition to a secondary school at Crews Hill which could be co-located with a primary school. Both policies also make provision for a local centre and additional local parades comprising retail, community and health facilities, together with other related social infrastructure.

6.19 Overall, the Traveller Local Plan is expected to have a minor positive (+) cumulative effect in relation to IIA objective 5.

IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity

6.20 Sites TLP_01, TLP_03 and TLP_09 are located outside of an existing or planned new community and so could hinder social integration between travelling and settled communities. Sites TLP_10 and TLP_11 are located within planned new communities and so could contribute towards social inclusion and promotion of equality and respect through the creation of sustainable, mixed communities. Further to this, Policy TLP2 requires the inclusion of a communal green space and community building at sites where required, which could provide opportunities for social interaction and facilitate access to community

services. There is also a requirement under Policy TLP2 for planning applications to demonstrate effective engagement with the Gypsy and Traveller community during the design process, ensuring they are involved in the process. Additionally, it requires planning applications to demonstrate that the proposed site layout is accessible and adaptable to suit a range of users, including disabled people, older people and families with young children.

6.21 Overall, the Traveller Local Plan is expected to have a mixed minor positive and minor negative (+/-) cumulative effect in relation to IIA objective 6.

IIA objective 7: Reduce crime and increase community safety

6.22 Policy TLP2 requires proposals to provide a communal green space containing a children's play space in an overlooked location. This is likely to improve safety. Further to this, the Traveller Local Plan will provide at least 30 pitches and one transit site, which will help reduce (and possibly prevent) the presence of unauthorised sites and encampments.

6.23 Overall, the Traveller Local Plan is expected to have a minor positive (+) cumulative effect in relation to IIA objective 7.

IIA objective 11: Minimise air pollution

6.24 The entire borough is designated an Air Quality Management Area and contains numerous Air Quality Focus Areas. Further to this, the current mean annual concentration of NO₂ at all five sites exceeds the 2021 WHO guidelines, and for sites TLP_09, TLP_10 and TLP_11 also exceeds the higher pollution levels allowed under the UK's national air quality objectives. Likewise, the current mean annual concentration of PM₁₀ and PM_{2.5} at all sites exceeds the 2021 WHO guidelines, with the exception of site TLP_01 which does not exceed the 2021 WHO guidelines for PM₁₀. The Traveller Local Plan will provide at least 30 pitches and one transit site in the plan period to 2041. This number of pitches and the transit site are unlikely to significantly contribute towards air pollution. The Traveller Local Plan does not contain any wording on mitigating air pollution. However, future baseline air pollution levels are likely to be reduced by increasing uptake of electric vehicles, driven by the Mayor of London's recent expansion of the Ultra Low Emission Zone, the Government's commitment to ban all new petrol and diesel cars from 2035 and the gradual rollout of electric vehicle charging networks. Electric vehicles do, however, contribute to non-exhaust particulates emissions from tyres.

6.25 Overall, the Traveller Local Plan is expected to have a minor negative (-) cumulative effect in relation to IIA objective 11.

IIA objective 12: Minimise the need to travel and support a modal shift away from the private vehicle

6.26 The five Traveller Local Plan sites fall within a low PTAL rating category and so have relatively (in a London context) poor connectivity, while some of them are not located within close proximity of a major, district or local centre where most services and facilities are located. Residents would therefore need to travel some distance in order to reach these centres. The Traveller Local Plan does not contain any wording on mitigating the poor access to public transport and proximity to services and facilities. However, Policy TLP2 requires planning applications for Traveller sites to explore opportunities to improve existing walking and cycling routes to encourage sustainable forms of travel.

6.27 It is possible that the negative effect may be mitigated to some degree by emerging Local Plan policies, including SP TLP1: Promoting a Sustainable and Decarbonised Transport System, DM T2: Forming a Healthy and Connected Enfield and DM T3: Constructing a Vibrant and Safe Enfield for Everyone. It is noted that significant development is proposed at Chase Park and Crews Hill in Enfield's emerging Local Plan and so with time it is expected that these sites will have good access to public transport as a result of the large-scale development proposed at these locations in the emerging Local Plan. Policies PL10 (Chase Park) and PL11 (Crews Hill) in the emerging Local Plan require development to maximise opportunities for sustainable and active travel. According to both policies, walkable and permeable neighbourhoods will be delivered to encourage links to services and facilities. Residential densities will reduce further away from the main public transport corridors so as to help ensure good access to enhanced public transport options. Further to this, the policies support the delivery of facilities for pedestrians and cyclists, alongside an expanded bus network. They also support a network of cycle and walking routes which should connect all parts of both sites. Providing a mix of uses within both areas is also likely to minimise the need to travel elsewhere via car in order to reach certain amenities.

6.28 Overall, the Traveller Local Plan is expected to have a significant negative (--) cumulative effect in relation to IIA objective 12.

IIA objective 13: Avoid/mitigate effects to valued habitats and ecological networks

6.29 Sites TLP_01, TLP_10 and TLP_11 intersect Priority Habitats, while sites TLP_10 and TLP_11 also intersect Sites of Importance for Nature Conservation. The other two sites, TLP_03 and TLP_09, are within close proximity of Priority Habitats and Sites of Importance for Nature Conservation. Therefore, these site allocations could have adverse effects on the natural environment. However, the proformas for sites TLP_01, TLP_03 and TLP_09 contain some site-specific mitigation. They seek to maximise the retention of existing trees and to minimise the impact of retained trees, in addition to retaining and enhancing boundary planting, and minimising the loss of hedgerows and established planting within sites. Similarly, Local Plan site allocation policies PL10 Chase Park and PL11 Crews Hill require protection and enhancement of the biodiversity on these sites. Further to this, Policy TLP2 requires sites and the layout of sites to not cause harm to the significance of biodiversity interests. This would help avoid and/or mitigate against the effects the provision of pitches or a transit site could have on valued habitats and ecological networks. Further to this, the provision of a communal green space at each site may help reduce recreational pressure on nearby green spaces. Lastly, the Environment Act 2021 will help address habitat loss and fragmentation through biodiversity net gain. Taken together, these should limit the potential adverse impacts on the natural environment.

6.30 The Habitats Regulations Assessment (HRA) of the Traveller Local Plan concludes that the plan will not have an adverse effect on any Habitats Sites or functionally linked habitats, due to any impact type. According to the HRA, the policy safeguards within the Local Plan and the accompanying Recreation Mitigation Strategy are considered sufficient to avoid any adverse effects on the integrity of Epping Forest Special Area of Conservation as a result of recreation.

6.31 It is possible that the potential negative effect may be mitigated to some degree by emerging Local Plan policies, including all those contained in the 'Blue and green Enfield' chapter of the Local Plan and Policy SP ENV1: Local Environmental Protection.

6.32 Overall, the Traveller Local Plan is expected to have a minor negative (-) cumulative effect in relation to IIA objective 13.

IIA objective 14: Sustain and enhance the significance of heritage assets

6.33 All five sites are within close proximity of heritage assets and so the siting of pitches and a transit site could have adverse effects on the settings of these historic assets. The proforma for site TLP_01 states that development of the site must demonstrate how it conserves and enhances the historic environment. However, the proformas for sites TLP_03 and TLP_09 do not contain this wording, and Policy TLP1 also does not contain any mitigation in terms of the historic environment. Policy TLP2 requires sites and the layout of sites to not cause harm to the significance or setting of heritage assets. Local Plan Policy PL10 Chase Park requires development to reflect the rural and historic agricultural character of the area to the north and west, and respect the significance and setting of Trent Park and surrounding designated assets, the Conservation Area, parkland and adjoining woodland. Local Plan Policy PL11 Crews Hill seeks to reflect the historic environment of the area and respond to the surrounding landscape character.

6.34 It is also possible that the potential negative effects may be mitigated to some degree by emerging Local Plan policies, including Policies SP DE1: Delivering a Well-designed, High Quality and Resilient Environment and SP DE10: Conserving and Enhancing Heritage Assets.

6.35 Overall, the Traveller Local Plan is expected to have a minor negative (-) cumulative effect in relation to IIA objective 14.

IIA objective 15: Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes

6.36 The effect pitches and transit sites could have on the landscape and townscape is expected to be limited, as only a small amount of built development would likely take place – in the form of a utility/storage/amenity or community building depending on the site. However, the presence of caravans could adversely affect the landscape. Policy TLP2 requires the provision of green buffers to the street and the site perimeter to reinforce the boundary of the site and to provide screening of views into/out

of the site. Further to this, the provision of a communal green space may help enhance the landscape. According to the policy, existing boundaries should be utilised and enhanced where feasible, while boundary treatments should be avoided that would have a detrimental visual impact on the character of the site and locality. The proformas for sites TLP_01, TLP_03 and TLP_09 and Local Plan policies PL10 Chase Park and PL11 Crews Hill also contain some site-specific mitigation that would help protect and enhance the landscape. Planning Policy for Traveller Sites also requires sites to be well planned or soft landscaped to positively enhance the environment and increase its openness, with adequate landscaping. It advises against enclosing sites with hard landscaping, high walls or fences.

6.37 Overall, the Traveller Local Plan is expected to have a negligible (0) cumulative effect in relation to IIA objective 15.

IIA objective 16: To achieve efficient use of land and materials

6.38 The Traveller Local Plan prioritises the development of brownfield sites in that three of the five sites allocated in the Traveller Local Plan are located on brownfield land and contain buildings that could potentially be converted for Gypsy and Traveller use (TLP_09, TLP_10 and TLP_11). The other two sites (TLP_01 and TLP_03) are located on greenfield land and comprise Grade 3 agricultural land, some of which is considered best and most versatile agricultural land. The location of sites on greenfield land classified as Grade 3 agricultural land cannot be mitigated.

6.39 In terms of waste, Policy TLP2 requires wastewater infrastructure, in addition to waste storage, disposal and collection.

6.40 Overall, the Traveller Local Plan is expected to have a mixed minor positive and minor negative (+/-) effect in relation to IIA objective 16.

IIA objective 17: To manage and reduce the risk of flooding

6.41 Traveller sites are classed as 'Highly vulnerable' to flooding in the Government's PPG. Although two of the sites fall within Flood Zones 2 and 3 (TLP_10 and TLP_11), the flood zones cover less than 25% of the area of each site and so it is anticipated that the pitches could be located outside of the flood zones – particularly as the locations of pitches in these sites have not yet been determined. These two sites and sites TLP_01 and TLP_09 also contain land at risk of surface water flooding. However, Policy TLP2: Design and Site Layout in the Traveller Local Plan requires surface water drainage incorporating SuDS where possible, which will help mitigate against surface water flood risk. Local Plan Policies PL10 Chase Park and PL11 Crews Hill also support flood mitigation measures.

6.42 It is possible that the potential negative effects may be mitigated to some degree by emerging Local Plan policies, including Policy SE7: Managing Flood Risk, alongside the NPPF.

6.43 Overall, the Traveller Local Plan is expected to have a negligible (0) cumulative effect in relation to IIA objective 17.

IIA objective 18: Minimise water use and protect water quality

6.44 Four of the five Traveller Local Plan sites (TLP_01, TLP_09, TLP_10 and TLP_11) either fall within a Source Protection Zone or contain watercourses. The location of pitches at these sites and a transit site at TLP_09 could therefore affect water quality. However, effects are expected to be limited considering only a small amount of built development is likely to take place in the form of an amenity building at each site. Further to this, it is unknown where in sites TLP_10 and TLP_11 the pitches would be located, and they could be located away from watercourses. Policy TLP1 which allocates the sites does not provide any mitigation in terms of water quality. However, Policy TLP2 requires details of wastewater infrastructure to be provided to help protect water from any form of contamination. Local Plan Policies PL10 Chase Park and PL11 Crews Hill include requirements that could help to avoid adverse effects on water quality.

6.45 Overall, the Traveller Local Plan is expected to have a negligible (0) cumulative effect in relation to IIA objective 18.

Table 6.2 Cumulative effects of the Traveller Local Plan

IIA objective	Traveller Local Plan
IIA1: Climate change mitigation	0
IIA2: Climate change adaptation	+
IIA3: Pitches	++
IIA4: Health and wellbeing	+/-
IIA5: Services and facilities	+
IIA6: Social inclusion	+/-
IIA7: Crime and community safety	+
IIA11: Air pollution	-
IIA12: Sustainable transport	--
IIA13: Biodiversity	-
IIA14: Historic environment	-
IIA15: Landscape and townscape	0
IIA16: Efficient use of land and materials	+/-
IIA17: Flooding	0
IIA18: Water	0

Cumulative effects with development proposed by other relevant plans and projects

6.46 The Traveller Local Plan will not be delivered in isolation from development proposals in other plans and projects covering LBE and the surrounding area. However, as the Traveller Local Plan only identifies five sites to deliver 30 pitches and one transit site, its contribution to cumulative effects with development proposed by the Local Plans of neighbouring authorities, together with Nationally Significant Infrastructure Projects, is considered to be negligible.

Chapter 7 Monitoring

7.1 The SEA Regulations require that "*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*" and that the environmental report should provide information on "*a description of the measures envisaged concerning monitoring*". Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

7.2 Although the PPG states that monitoring should be focused on the significant environmental effects of implementing a plan, the reason for this is to enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects which the IIA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this IIA Report in relation to all of the IIA objectives in the IIA framework. As the Traveller Local Plan is implemented and the likely significant effects become more certain, the Council may wish to narrow down the monitoring framework to focus on those effects of the Traveller Local Plan likely to be significantly adverse.

7.3 Table 7.1 sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Traveller Local Plan. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the Council remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up-to-date and reliable. This table will be updated at subsequent stages of the Traveller Local Plan preparation to reflect any revisions made to the proposed monitoring indicators for the Traveller Local Plan itself.

Table 7.1 Proposed monitoring indicators

IIA objective	Proposed monitoring indicators
IIA objective 1: Ensure the Traveller Local Plan helps Enfield become a carbon neutral borough by 2040	<ul style="list-style-type: none"> ■ Per capita reduction in CO₂ emissions in the borough ■ Carbon emissions from transport
IIA objective 2: 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	<ul style="list-style-type: none"> ■ Exceedance of the energy/emissions standards in the Building Regulations
IIA objective 3: Deliver the sites needed to meet the accommodation needs of Gypsies and Travellers, supporting an appropriate mix of permanent sites and transit sites	<ul style="list-style-type: none"> ■ Number of sites allocated or granted permission for pitches ■ Number of transit sites allocated or granted permission
IIA objective 4: Improve the physical and mental health and wellbeing of Gypsies, Travellers and Travelling Showpeople, while also reducing health inequalities between travelling and settled communities	<ul style="list-style-type: none"> ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services ■ Percentage population living within 500m of a GP ■ New recreation and leisure facilities
IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing travelling communities, mindful of the	<ul style="list-style-type: none"> ■ Number of primary and secondary school places ■ Percentage of population within 30 minute public transport time of educational, healthcare and community facilities

IIA objective	Proposed monitoring indicators
potential for community needs to change over time	<ul style="list-style-type: none"> ■ S.106 contributions accumulated per annum for improvements to public transport, leisure services, education, health and community services
IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity	<ul style="list-style-type: none"> ■ Employment / unemployment rate in the borough ■ Index of Multiple Deprivation
IIA objective 7: Reduce crime and increase community safety	<ul style="list-style-type: none"> ■ Crime rates – total offences per population ■ Theft rate ■ Number of drug offences
IIA objective 11: Minimise air pollution	<ul style="list-style-type: none"> ■ % of journeys to work by public transport or active transports ■ Air quality – average NO₂, PM₁₀ and PM_{2.5} levels (µg/m³) ■ Per capita reduction in CO₂ emissions in the borough
IIA objective 12: Minimise the need to travel and support a modal shift away from the private vehicle	<ul style="list-style-type: none"> ■ Travel to work ■ Completed sections of Enfield walk and cycle networks ■ Rail service frequency
IIA objective 13: Avoid/mitigate impacts to valued habitats and ecological networks	<ul style="list-style-type: none"> ■ Natural England's Sites of Special Scientific Interest (SSSI) condition assessments for SSSIs within the borough ■ Achievement of Biodiversity Action Plan targets ■ Losses/changes to biodiversity status of Sites of Importance for Nature Conservation
IIA objective 14: Sustain and enhance the significance of heritage assets	<ul style="list-style-type: none"> ■ Number of buildings on Historic England's Buildings at Risk Register ■ Review of Conservation Area Appraisals and Management Proposals (every 5 years) ■ Number and % of listed buildings (all grades), scheduled monuments, registered parks and gardens and conservation areas
IIA objective 15: Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes	<ul style="list-style-type: none"> ■ Landscape character appraisals and impacts ■ % of development built on brownfield sites/previously developed land ■ Extension of Enfield Characterisation
IIA objective 16: To achieve efficient use of land and materials	<ul style="list-style-type: none"> ■ Previously developed land that has been vacant or derelict for more than 5 years ■ Amount of municipal waste arising and managed (by management type, by waste planning authority) ■ Best and most versatile agricultural land in the borough
IIA objective 17: To manage and reduce the risk of flooding	<ul style="list-style-type: none"> ■ Number of planning permissions granted contrary to the advice of the Environment Agency on flood and water quality grounds

IIA objective	Proposed monitoring indicators
	<ul style="list-style-type: none">■ Water conservation and efficiency and sustainable drainage measures incorporated into new developments
IIA objective 18: Minimise water use and protect water quality	<ul style="list-style-type: none">■ River quality chemical and biological■ Water use■ Delivery of water supply, drainage and sewerage infrastructure to support new development

Chapter 8

Conclusions and next steps

8.1 This IIA Report has been prepared to accompany the Regulation 19 consultation on the Submission Plan. The IIA has sought to identify significant sustainability effects, including health, equalities and community safety emerging from the Traveller Local Plan, through an integrated impact assessment process that meets requirements in the SEA Regulations and NPPF, and follows good practice set out in the PPG.

Recommendations

8.2 The following recommendations could be implemented in Policy TLP1, Policy TLP2 or the site proformas, as judged appropriate by the Council. These recommendations are made for the Council's consideration, acknowledging that the policies set out in the emerging Enfield Local Plan will also address many of the matters raised (including energy efficient design, protection of open space, encouraging sustainable modes of travel, protecting wildlife, conserving the historic environment and reducing the risk of flooding).

- There could be a requirement for any buildings constructed on any of the allocated sites (e.g. a utility/storage/amenity building) to incorporate energy efficient design, which could help reduce carbon emissions. In addition, the sites could be developed in a way that it is resilient to the effects of climate change, such as active and passive cooling to mitigate overheating during heatwaves.
- Policy TLP1 or the site proformas could outline how social integration will be promoted between travelling and settled communities.
- Policy TLP1 or the site proformas could set out how the natural environment, specifically nearby Priority Habitats and Sites of Importance for Nature Conservation will be protected and enhanced.
- Policy TLP1, or alternatively site proformas for TLP_03 and TLP_09, could contain some wording on how the historic environment will be protected and enhanced.
- Policy TLP1 or the site proformas could set out mitigation measures to reduce the risk of surface water flooding at sites TLP_01, TLP_09, TLP_10 and TLP_11.
- Policy TLP1 could specify how water quality will be protected through the careful siting of pitches. The policy could also require that consideration be given to the proximity of water bodies, watercourses and Source Protection Zones to sites during the construction of amenity buildings.
- Policy TLP2 could be more specific about what kind of community building would be provided and what it could be used for.

Next steps

8.3 This IIA Report will be available for consultation alongside the Regulation 19 Submission Plan.

8.4 That consultation will be on the version of the Traveller Local Plan that the Council proposes to submit to the Secretary of State for Examination and will be accompanied by this IIA Report.

8.5 Following the above periods of public consultation, the Traveller Local Plan will be independently examined by a government-appointed Planning Inspector appointed by the Secretary of State, who will consider and challenge its content and any objections to it, and reach a decision on its overall 'soundness' before it can proceed to be adopted.

LUC

September 2025

Appendix A

Consultation comments received on the Integrated Impact Assessment

Table A.1 Representations received on the Integrated Impact Assessment (August 2024) of the Draft Traveller Local Plan (September 2024) consulted upon from 23 September to 4 November 2024

Respondent no.	Comment	LUC's response
212 – private individual	The IIA states that site TLP-03 would be negligibly affected by flooding. On the contrary, there is evidence of recent flooding in this area.	Site TLP-03 does not fall within Flood Zones 2 or 3 and also does not contain land at risk of surface water flooding. Therefore, the site receives a negligible effect in relation to IIA objective 17: Flooding.
216 – private individual	The Integrated Impact Assessment and the Local Plan state that there is a requirement for 21 permanent pitches. However, the Traveller Local Plan states that there is a requirement for 30 permanent pitches. Why is this?	<p>The only references to 21 pitches are contained within Appendix D ('Integrated Impact Assessment findings for the Issues and Options Traveller Local Plan') of the IIA, which presents the IIA findings of the Issues and Options Traveller Local Plan (consulted upon from 29 September to 10 November 2023), which identified a need for 21 pitches to meet the PPTS need and 23 pitches to meet the cultural need.</p> <p>The Gypsy and Traveller Accommodation Assessment was updated in 2024 and subsequently identified a need for 30 pitches. This was reflected in the Draft Traveller Local Plan (consulted upon from 23 September to 4 November 2024).</p> <p>The August 2024 IIA correctly refers to the need for 30 pitches in Chapters 1 ('Introduction'), 5 ('Integrated Impact Assessment findings of the Traveller Local Plan policies') and 6 ('Cumulative effects').</p>
317 – private individual	<p>TLP-03 is part of the Regulation 18 TLP but for some reason the overall 'Pitch' requirement for the Borough is overstated and at odds with both the recently submitted Local Plan and the Traveller Local Plan Integrated Impact Assessment.</p> <p>LBE has submitted the Regulation 19 Enfield Local Plan. In the Local Plan, Policy H10: Traveller Accommodation states that the Council will meet the identified need of at least 21 pitches. This 'identified need' for 21 pitches</p>	<p>The 2020 Gypsy and Traveller Accommodation Needs Assessment identified a need for 21 pitches (to meet the PPTS need) or 23 pitches (to meet the cultural need).</p> <p>In the IIA, the only references to the need for 21 pitches are contained within Appendix D ('Integrated Impact Assessment findings for the Issues and Options Traveller Local Plan') of the IIA, which presents the IIA findings of the Issues and Options Traveller Local Plan (consulted upon from 29 September to 10 November 2023). The Issues and Options Traveller Local Plan referred to the findings of</p>

Respondent no.	Comment	LUC's response
	<p>over the period of the Plan is taken from the Traveller Local Plan Integrated Impact Assessment carried out by LUC. The Regulation 18 TLP now states the overall pitch requirement as 30, within section 4 of the document. Why has the need increased by nearly 48%?</p>	<p>the 2020 Gypsy and Traveller Accommodation Needs Assessment (21 pitches to meet the PPTS need and 23 pitches to meet the cultural need).</p> <p>The Gypsy and Traveller Accommodation Assessment was updated in 2024 and subsequently identified a need for 30 pitches. This was reflected in the Draft Traveller Local Plan (consulted upon from 23 September to 4 November 2024).</p> <p>The August 2024 IIA correctly refers to the need for 30 pitches in Chapters 1 ('Introduction'), 5 ('Integrated Impact Assessment findings of the Traveller Local Plan policies') and 6 ('Cumulative effects').</p>
364 – private individual	<p>The TLP's Integrated Impact Assessment contains contradictory information. For example, it suggests that sites (e.g. TLP-03) would have a negative impact on the borough's landscape character and quality. Furthermore, while the assessment allows for 22 pitches on this site, only 16 are projected to be needed by 2024/25.</p>	<p>It is unclear from this comment how the assessment of TLP_03 in relation to landscape character and quality is contradictory.</p> <p>Enfield Council is responsible for identifying the number of pitches to be provided at each site. The purpose of the IIA is to objectively appraise each reasonable alternative site option against a set of objectives covering the environmental, social and economic aspects of sustainable development.</p>
373 – Friends of Firs Farm (FOFF)	<p>FOFF objects to the allocation of site TLP-09, due to the location of the site on the A10, and the noise and air pollution resulting from this makes it an unsuitable site for a residential location for Travellers, as it may have an adverse effect on their health.</p> <p>Environmental conditions at the proposed transit site are poor. Enfield Council's most recent Air Quality Annual Status Report, published in June 2024, indicates that together with Church Street in Enfield Town Centre, the nearby monitoring position on the A10 has consistently failed to meet the UK Air Quality Standard for nitrogen dioxide (NO₂) over a number of years. Similarly, according to the baseline chapter of the "Draft Transport Plan 2019 and Local Implementation Plan Strategic Environmental Assessment – Environmental Report", the main areas affected by traffic noise in Enfield are along the main traffic routes through the borough, in particular areas close to the A10. Providing residential accommodation for Travellers at the transit site, albeit temporarily, is contrary to Enfield's New Local Plan</p>	<p>The respondent is referring to site TLP-09, which is proposed for transit pitch provision in the Draft Traveller Local Plan.</p> <p>All reasonable alternative site options are appraised using the criteria presented in Appendix E ('Site assessment criteria') of the IIA. IIA objective 11 covers air quality and as explained in Chapter 4 ('Integrated Impact Assessment findings of the reasonable alternative site options') of the IIA, site TLP-09 receives minor negative effects against criteria <i>11a NO₂ pollution</i>, <i>11b PM₁₀ pollution</i> and <i>11c PM_{2.5} pollution</i>, as the current baseline annual mean concentration of NO₂, PM₁₀ and PM_{2.5} at the site exceeds the 2021 WHO guidelines and so would result in exposure to these pollutants. This results in minor negative effects overall vs. IIA objective 11.</p> <p>IIA objective 4 covers health, which includes consideration of noise pollution under criterion <i>4d Acoustic privacy</i>. Site TLP-09 receives a major negative effect against criterion 4d, as major noise issues are experienced on or close to the site, which require mitigation. The site receives a negligible effect overall in relation to IIA objective 4, as despite experiencing noise pollution, it is within close proximity of a GP surgery, open space and a cycle path, ensuring</p>

Respondent no.	Comment	LUC's response
	<p>policies to “protect the amenity of occupiers of existing and proposed homes in terms of ... Noise” and in an area of poor air quality. Policy TLP2 states that sites “must embed noise mitigation measures into the site design”, which we do not believe will be possible given the constructed nature of the site.</p> <p>The Integrated Impact Assessment published alongside the draft Traveller Local Plan does not identify these issues in the Health Impact Assessment reported, and is therefore deficient in this respect.</p> <p>Because of the potential adverse health impacts of the proposal for the Traveller community, we believe that this proposal should not be taken forward in the final version of the Traveller Local Plan.</p>	<p>access to healthcare and opportunities for physical exercise and outdoor recreation.</p>
380 – Tottenham Hotspur Football Club	<p>There are contradictions in the Council's analysis. The Technical Assessment of the site TLP-01 states that no heritage considerations apply, which cannot be correct given the quantum and proximity of assets nearby. The accompanying Integrated Impact Assessment does identify heritage constraints in high-level terms, but this is not considered in any further detail nor has this informed the subsequent site selection process.</p>	<p>All reasonable alternative site options are appraised using the criteria presented in Appendix E ('Site assessment criteria') of the IIA. IIA objective 14 covers the historic environment utilising proximity tests, which are intended to provide a basis for screening for the potential for adverse effects on heritage assets. In the absence of a separately commissioned historic environment sensitivity study or similar, they are subject to a high degree of uncertainty. Site TLP_01 receives a major negative effect in relation to IIA objective 14: Historic environment, as it is within 500m of listed buildings, a scheduled monument, registered parks and gardens and local heritage assets. The site also falls within an Archaeological Priority Area.</p> <p>The Council has confirmed that the proforma for site TLP_01 incorrectly omitted the relevant heritage considerations. However, the relevant heritage considerations were taken into account as part of the site selection process and as above, were taken into account through the IIA. The Regulation 19 Traveller Local Plan will include updated heritage considerations in the proforma for this site.</p>
404 – hgh Consulting on behalf of St John's Prep and Senior School	<p>The IIA makes clear (final bullet point under paragraph 2.56) that consideration was not afforded to locally designated biodiversity sites, with 'professional judgment' applied to define precautionary distance thresholds which may have an adverse</p>	<p>The final bullet point under paragraph 2.56 states that it was considered disproportionate to consider the designated features of individual, locally designated biodiversity sites that may be affected. Consideration was given to locally designated biodiversity sites but not their individual features.</p>

Respondent no.	Comment	LUC's response
	<p>effect. It is therefore clear that there are limitations with regard to how the proposals have been assessed, focusing primarily on statutory designated sites with little regard afforded to local (non-statutory) designations, habitats or protected species.</p>	<p>All reasonable alternative site options are appraised using the criteria presented in Appendix E ('Site assessment criteria') of the IIA. IIA objective 13 comprises two criteria: <i>13a International and national biodiversity and geodiversity assets</i> and <i>13b Locally designated wildlife sites Priority Habitat Inventory and Ancient Woodland</i>. Criterion 13b looks at Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature Conservation Interest and Sites of Metropolitan/Borough/Local Importance), Local Nature Reserves, Priority Habitats and Ancient Woodland. This approach is considered robust and proportionate to strategic assessment of a Local Plan.</p> <p>At the next stage of plan-making, a Habitats Regulations Assessment (HRA) will be undertaken. The purpose of HRA is to assess the impact of a plan (in this case the Traveller Local Plan) on Special Areas of Conservation, Special Protection areas and Ramsar sites ('Habitats sites').</p>
	<p>The IIA identifies a key objective relating to biodiversity (13), which is to "avoid/mitigate impacts to valued habitats and ecological networks". Whilst reference is made to BNG within the IIA at a number of locations, there is no objective to delivering any net gains or enhancements to biodiversity.</p> <p>Chapter 5 subsequently assesses the Draft TLP policies. As outlined in paragraph 5.13, policy TLP1 does not contain any wording to mitigate for adverse effects and is therefore assessed, in the IIA, as being expected to have a significant negative effect in relation to the biodiversity objective (IIA13).</p> <p>As set out in paragraph 5.26, the assessment of Policy TLP2 notes the wording to avoid harm and states that "this will help avoid and/or mitigate against the effects the provision of pitches or a transit site could have on valued habitats and ecological networks". The IIA therefore assesses that this is expected to have a minor positive effect in relation to the biodiversity objective (IIA13).</p> <p>For the reasons outlined above, Ecology Solutions' professional view is that the wording of TLP2 is too high-</p>	<p>IIA is a strategic tool designed to identify the likely sustainability effects of a plan as a whole. The level of detail of assessment is considered robust and proportionate to assessment of a Local Plan. More detailed consideration of effects on biodiversity and other issues will take place through the development management process when any specific development proposals come forwards.</p> <p>IIA objective 13: Avoid/mitigate impacts to valued habitats and ecological networks is accompanied by a number of appraisal questions. The appraisal questions provide a guide for the appraisal of options, identifying issues relating to the IIA objective that should be considered where relevant. Given the large number of considerations that are potentially relevant to each IIA objective, it is not possible to list all these and therefore these questions are not intended to be prescriptive or exhaustive. Other relevant factors, such as a policy requirement to provide biodiversity net gain, would be taken into account when appraising the TLP.</p> <p>As explained at paragraph 5.26 of the IIA, the minor positive effects identified for Policy TLP 2 relate to the policy requirements to avoid harm to the significance of biodiversity interests and to provide a communal green with provision for a children's play space, the latter having potential to reduce the potential for recreation pressure on nearby wildlife. These effects are</p>

Respondent no.	Comment	LUC's response
	<p>level to be afforded any significant weight. Moreover, it is concerned with the provision of avoidance and mitigation for effects, as opposed to enhancement or delivery of net gains.</p> <p>While the IIA draws reference to other planning policies and the potential to mitigate these [biodiversity] effects, it is clear that the regard given to this is very high level and generic. There is no evidence to demonstrate that any clear consideration has been afforded to these policies in any meaningful way.</p>	<p>for the policy in isolation. The effects identified for the TLP as a whole in relation to IIA objective 13 are minor negative for the reasons set out in paragraphs 6.22-6.23 of the IIA. Further to this, Table 8.1 of the IIA includes a recommendation for Policy TLP1 to set out how the natural environment, specifically Priority Habitats and Sites of Importance for Nature Conservation, will be protected and enhanced.</p>
426 – private individual	<p>The Council's own Integrated Impact Assessment does not support development of the site [TLP-03]. It is the only site with negative scores for 'Education' and 'Services & Facilities'. The proposal to locate most of the traveller pitches on this site is therefore hard to understand.</p>	<p>The IIA does not state whether development is or is not supported at different sites. Instead, it provides an objective assessment of each reasonable alternative site option against a set of IIA objectives. The IIA findings are summarised in Table 4.1 and show that while site TLP_03 is the only site option to score negatively in relation to IIA objective 5: Services and facilities, it scores more positively or less negatively than other options in relation to other IIA objectives, specifically in relation to IIA objective 3: Housing; IIA objective 13: Biodiversity; IIA objective 17: Flooding; and IIA objective 18: Water.</p> <p>In addition, as explained in paragraph 2.21 of the IIA, the IIA findings are not the only factors taken into account when plan-makers are determining a preferred option to take forward in a plan. There will often be a similar number of positive and negative effects identified by the IIA for each option in relation to different IIA objectives, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy are also to be taken into account by plan-makers when selecting preferred options for the plan. As such, the IIA is a decision-aiding tool, not a decision-making tool.</p> <p>The site selection process followed by the Council is outlined in paragraphs 2.27-2.31 of the IIA and detailed in its Site Selection Topic Paper.</p>

Table A.2 Representations received on the Integrated Impact Assessment: Scoping and Initial Options Appraisal Report (July 2023) that accompanied the Issues and Options Traveller Local Plan (September 2023) consulted upon from 29 September to 10 November 2023

Consultee	Comment	LUC's response
National Highways	<p>We have reviewed the information available for this Issues and Options consultation on Enfield's Traveller Local Plan. We will assess the transport implications of any proposals for individual allocations as they are identified in due course through the development of the local plan process and will appreciate being kept informed of future progress.</p>	Noted.
Historic England	<p>Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</p> <p>In terms of relevant plans, policies and programmes in relation to the historic environment, we would suggest that the following should also be referenced in the document:</p> <ul style="list-style-type: none"> ■ Historic England Advice Note 8 – Site Allocations ■ Planning (Listed Buildings & Conservation Areas) Act 1990 ■ Ancient Monuments & Archaeological Areas Act 1979 ■ London Plan 2021 – Policies D3 Optimising Site Capacity through the design-led approach and HC1 Heritage conservation and growth ■ London Borough of Enfield Heritage Strategy and relevant conservation area appraisals and management strategies 	<p>Reference to the Planning Act, Ancient Monuments & Archaeological Areas Act and London Plan has been added to the policy context section of the IIA Report that will accompany the second round of Regulation 18 consultation.</p> <p>The other documents suggested are advice/guidance which are not relevant to the policy context section.</p>
	<p>In terms of the overall process relating to the Sustainability Appraisal of the emerging Local Plan, Historic England strongly advises that the conservation team of your authority and your archaeological advisors are closely involved throughout its preparation. They are best placed to advise on: local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to</p>	Noted.

Consultee	Comment	LUC's response
	<p>minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.</p> <p>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>	
Canal and River Trust	<p>Based on the documents and information available the Trust has no specific comments to make in relation to the evidence base, and criteria-based approach, and the site selection criteria would appear reasonable. However, we would want the opportunity to consider the impact of any potential sites located within our notified area with regards to potential impacts on our waterway, such as land stability, access, landscaping, drainage, etc. We therefore request that we are reconsulted at the next stage of your plan.</p> <p>It should be noted that the above comments do not prejudice any further matters that might be raised at a later stage as the plan/document emerges.</p>	Support noted.
London Gypsies and Travellers	<p>Question 9: Which of the identified policy options above are most appropriate for the TLP? Please explain your answer.</p> <p>We support options 1 and 3 which appear the most appropriate and sustainable. In addition, we would also encourage the Council to work in partnership with Haringey Council as a neighbouring authority to explore the potential joint delivery and management of a larger site that can meet some of the needs of families in both boroughs. The site located on Great Cambridge Road which is owned by Haringey Council and within Enfield's planning authority has been discussed as a potential location and we strongly recommend that this is considered and assessed as a potential allocation.</p>	<p>If a site is considered a reasonable option by Enfield Council then it will be subjected to IIA.</p> <p>The site located on Great Cambridge Road was withdrawn. Therefore, it is not available and not considered a reasonable alternative.</p> <p>Enfield Council will continue to ensure close consultation with Gypsy and Traveller residents and community groups, and design requirements will be further addressed throughout the plan-making process.</p>

Consultee	Comment	LUC's response
	<p>Question 11: Are there specific urban or rural locations or sites specifically within the east or the west of the Borough which the TLP should consider? Please provide further information if so.</p> <p>Please see the response to Question 9. In addition, any smaller sites that are being considered for residential accommodation, in particular land owned by the local authority, should be included in the appraisal of site allocation options. Site allocations made in the Enfield Local Plan for residential use should also be considered.</p>	<p>Enfield Council cannot allocate sites in neighbouring authorities. Therefore, land owned by Enfield Council should not be included in the appraisal of site allocation options unless it is located within the London Borough of Enfield.</p> <p>The Traveller Local Plan is separate to the Local Plan and so site allocations made in the Enfield Local Plan for residential use should not be considered in the IIA, unless they are considered reasonable options in terms of the Traveller Local Plan. In this regard, the Council has identified that Local Plan allocations at Chase Park (TLP_10) or Crews Hill (TLP_11) can also contribute towards meeting the longer-term need for permanent Traveller provision.</p>
Metropolitan Police	<p>1.21 The CSIA will be undertaken in accordance with the requirements of the Crime and Disorder Act 1998 and the Police and Justice Act 2006, as amended, and will fulfil the requirement to carry out a review of the levels and patterns of crime, disorder and community safety in the area when developing a strategy or plan.</p> <p>If any assistance is required in completing a CSIA please contact ourselves via the Designing out Crime Unit NE.</p> <p>Likely future changes without the Traveller Local Plan Para 3.53</p> <p>The number of notifiable offences committed in Enfield has seen a near negligible decrease and although there has been a decrease in burglaries, there has been an increase in theft. The Traveller Local Plan is unlikely to directly affect levels of crime unless relating to unauthorised encampment activity, and so it is very difficult to anticipate future trends. Without the Traveller Local Plan, there may be an increase in unauthorised developments and encampments due to the lack of allocated sites available for Travellers, and so could lead to tensions between Traveller and settled communities.</p> <p>Recently there has been increased illegal occupation at the Meridian Water site/s and Mollison Avenue where vacant sites have been occupied by organised criminal gangs with Traveller links that have increased tensions with</p>	<p>Noted.</p> <p>Noted.</p> <p>The Scoping and Initial Options Appraisal Report acknowledges issues in Enfield regarding unauthorised encampment activity and crime in the baseline information provided in Chapter 3. Further to this, references are also made to unauthorised sites and encampments in the appraisal of options presented in Chapter 6 of the Scoping and Initial Options Appraisal Report.</p> <p>This information will be added to the baseline information in the IIA report that accompanies the second round of Regulation 18 consultation.</p>

Consultee	Comment	LUC's response
	<p>the workforce employed on the large infrastructure projects at the location, this has also meant the LB Enfield has had to cover the cost to clear the site of over 200 tons of illegally dumped waste materials at a cost of over £250K and potentially increase security at the location/s, therefore the importance for the Traveller Local Plan has never been more relevant.</p>	
	<p>IIA objective 7: Reduce crime and increase community safety.</p> <p>We support the appraisal questions and would urge the Crime & Community Safety Team to maintain communications with ourselves in this regard.</p>	Support noted.
	<p>We are supportive of the proposed aims and offer our services where we would hope to influence positive interventions in crime prevention, reduction in the fear of crime and increase the community safety.</p>	Support noted.
Environment Agency	<p>Flood risk</p> <p>As permanent residential caravans fall under highly vulnerable in the flood risk classification table (Annex 3 of the National Planning Policy Framework) We would wish for more emphasis on flood risk in the plan. Ideally Traveller sites should be excluded from all areas of flood risk (not just high risk) and located in flood zone 1.</p> <p>Should sites be suggested in flood zone 2, you will need to pass the exception test and provide a level 2 Strategic Flood Risk Assessment (SFRA) to assess the level of risk.</p>	<p>The vulnerability of Gypsy and Traveller sites to flood risk is reflected in the criteria used to appraise all reasonable site options in the IIA. Any sites that fall within Flood Zones 2 or 3 will receive a major negative effect.</p>
	<p>Table 4.1 issues and opportunities</p> <p><u>Biodiversity, key sustainability issues:</u></p> <p>Alongside the point about the ecological status of watercourses, it would be useful to reference the Water Framework Directive 2000 and its aims to bring watercourses from poor to good ecological status.</p> <p><u>Biodiversity, opportunities for the Traveller Local Plan:</u></p> <p>It would be useful to highlight the importance of locating sites and developments at least 8m from the riparian buffer zone of watercourses in</p>	<p>Reference to the Water Framework Directive 2000 and its aims to bring watercourses from poor to good ecological status has been added to the key sustainability issues section in the IIA report that accompanies the second round of Regulation 18 consultation.</p> <p>The importance of locating sites and developments at least 8m from the riparian buffer zone of watercourses has also been added to the key sustainability issues section of the IIA report.</p>

Consultee	Comment	LUC's response
	<p>the catchment. Ensuring no development or activity within this zone protects the habitats which support biodiversity and protected species.</p>	
	<p>IIA objective 13: We would suggest adding:</p> <ul style="list-style-type: none"> ■ Avoid impacts on watercourses by maintaining the 8m riparian buffer zone, while maximising opportunities to further enhance biodiverse aquatic and riparian habitats supporting biodiversity? 	<p>Suggested edits to IIA objective 13 have been added.</p>

Appendix B

Plans, policies and programmes

Air and water quality

International

B.1 The 2030 Agenda for Sustainable Development (2015)¹ adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 3: Good Health and Well-Being;
- SDG 6: Clean Water and Sanitation;
- SDG 7: Affordable and Clean Energy;
- SDG 11: Sustainable Cities and Communities;
- SDG 12: Responsible Consumption and Production; and
- SDG 14: Life Below Water.

National

B.2 The NPPF (2024)² states that air quality and subsequently public health can be improved by focusing development in locations that can be made sustainable through limiting the need to travel or offering a genuine choice of transport modes. It further states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones. Furthermore, the NPPF seeks to improve air quality of mitigate impacts through traffic and travel management and green infrastructure provision and enhancement. The NPPF also makes reference to contaminated land under paragraphs 189-190, stating that where appropriate despoiled, degraded, derelict, contaminated land should be remediated and mitigated. The NPPF is supported by Planning Practice Guidance relating to:

- **Air quality (2019)**³ provides guidance on air quality considerations planning needs to take into account.
- **Water supply, wastewater and water quality (2019)**⁴ advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.

B.3 The Air Quality Strategy for England (2023)⁵ sets out local authorities powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

¹ United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (<https://sdgs.un.org/2030agenda>)

² MHCLG (2024) National Planning Policy Framework (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

³ MHCLG (2019). Air quality. (see <https://www.gov.uk/guidance/air-quality--3>)

⁴ MHCLG (2019). Water supply, wastewater and water quality. (see <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>)

⁵ Department for Environment, Food & Rural Affairs (2023) The air quality strategy for England (see: <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england>)

B.4 The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023)⁶

sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England. The programme aims to move to a circular economy by keeping goods in circulation for as long as possible and at their highest value. This includes increasing the reuse, repair and remanufacture of goods.

B.5 The Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023)⁷ sets out numerous actions Defra will be taking to clean up waters and ensure a plentiful supply for the future.

B.6 The Environment Act 2021⁸ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. Regarding air quality, the Act sets out legislation which covers:

- Local air quality management frameworks and the recall of motor vehicles etc.
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

B.7 The Waste (Circular Economy) (Amendment) Regulations 2020⁹ amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.8 Clean Air Strategy 2019 (2019)¹⁰ sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2030. The goal is to reduce the harm to human health from air pollution by half.

B.9 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹¹ protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.10 Of the key areas in the **25 Year Environment Plan (2018)¹²** around which action will be focused in terms of the protection of air quality are:

⁶ Department for Environment, Food & Rural Affairs (Defra) (2023) Waste prevention programme for England: Maximising Resources, Minimising Waste (see <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste>)

⁷ Defra (2023) Plan for Water: our integrated plan for delivering clean and plentiful water (see <https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>)

⁸ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

⁹ HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020 (see <https://www.legislation.gov.uk/uksi/2020/904/contents/made>)

¹⁰ Defra (2019). Clean Air Strategy. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

¹¹ HM Government (2019). The Conservation of Habitats and Species Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules>)

¹² HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

- Using and managing land sustainably:
 - Embed a ‘net environmental gain’ principle for development, including natural capital benefits to improved and water quality.
- Increasing resource efficiency and reducing pollution and waste:
 - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

B.11 The Road to Zero (2018)¹³ sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.12 Our Waste, Our Resources: A Strategy for England (2018)¹⁴ aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.13 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)¹⁵ provides the Government’s ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.14 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017¹⁶ focuses on ensuring good qualitative and quantitative health, i.e. on reducing and removing pollution and on ensuring that there is enough water to support wildlife at the same time as human needs. It protects inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process.

B.15 The Water Supply (Water Quality) Regulations 2018¹⁷ outlines guidelines and standards for maintaining the quality of water in a given water supply system. This regulation aims to ensure the safety and potability of water that is provided to the public. It covers various aspects related to water quality, including monitoring, testing, treatment, and reporting of water quality data. The regulation also sets out specific parameters for different contaminants and substances in the water, such as microbiological organisms, chemicals, and physical characteristics.

B.16 The Nitrate Pollution Prevention Regulations 2015¹⁸ provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.17 The Environmental Permitting Regulations 2016¹⁹ streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause

¹³ HM Government (2018). The Road to Zero. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

¹⁴ HM Government (2018). Our Waste, Our Resources: A strategy for England. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)

¹⁵ Defra (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)

¹⁶ HM Government (2017). The Water Environment (Water Framework Directive) (England and Wales) Regulations. (see

<https://www.legislation.gov.uk/uksi/2017/407/contents/made>)

¹⁷ HM Government (2018). The Water Supply (Water Quality) Regulation (see <https://www.legislation.gov.uk/wsi/2018/647/made>)

¹⁸ HM Government (2016). The Nitrate Pollution Prevention Regulations. (see

<https://www.legislation.gov.uk/uksi/2015/668/contents/made>)

¹⁹ HM Government (2016). The Environmental Permitting Regulations. (see

<https://www.legislation.gov.uk/uksi/2016/1154/contents/made>)

harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.18 The Air Quality Standards Regulations 2010²⁰ set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.19 National Planning Policy for Waste (NPPW) (2014)²¹: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

B.20 The Water White Paper (2012)²² provides the government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

B.21 National Policy Statement for Waste Water (2012)²³ sets out government policy for the provision of major waste water infrastructure. The policy set out in this National Policy Statement is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent

B.22 Safeguarding our Soils – A Strategy for England (2009)²⁴ sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

B.23 Future Water: The Government's Water Strategy for England (2008)²⁵ sets out how the government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, while discharge from sewers will be reduced.

B.24 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)²⁶ sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

²⁰ HM Government (2016). The Air Quality Standards Regulations. (see <https://www.legislation.gov.uk/ukxi/2010/1001/contents/made>)

²¹ Department for Communities and Local Government (2014). National Planning Policy for Waste. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

²² Defra (2012). The Water White Paper. (see <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>)

²³ HM Government (2012). National Policy Statement for Waste Water. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)

²⁴ Defra (2009) Safeguarding our Soils: A Strategy for England.

²⁵ HM Government (2011). Future Water: The Government's water strategy for England (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)

²⁶ Defra (2007). The Air Quality Strategy for England, Scotland, Wales and Northern Ireland.

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

B.25 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017²⁷

requires Member States to use their River Basin Management Plans and Programmes of Measures to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration. Good status means both good chemical and good ecological status.

B.26 The Environmental Protection Act 1990²⁸ makes provision for the improved control of pollution to air, water and land by regulating the management of waste and the control of emissions. The Act seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

B.27 The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance²⁹

establishes a framework for identifying and remediating land that has been polluted by hazardous substances. The Guidance provides detailed instructions and criteria for assessing and managing contaminated sites to ensure environmental protection and public health.

B.28 The Private Water Supplies (England) Regulations 2016³⁰ apply to all private water supplies intended for human consumption and water used for food preparation purposes. The Regulations require the local authority to conduct a risk assessment of every relevant supply in the district or borough. This involves a survey of the source of the supply and surrounding area to see if any contamination is possible. It includes checking any storage tanks, treatment systems and pipework associated with the supply. This will identify any actual and potential hazards that may affect the health of those drinking the water and what action is needed to mitigate those hazards.

Sub-national

B.29 The London Plan (2021)³¹ is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plan. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan. In reference to air quality, the Plan seeks to create a healthier city by seeking to "*improve London's air quality reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution*". In relation to water quality, the Plan seeks to "*promote improvements to water supply infrastructure to contribute to security of supply*", as well as promoting development that seeks to "*facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitat*".

B.30 Air Quality Positive (AQP) guidance (2023)³² aims to maximise benefits to local air quality in and around large-scale development sites and masterplan areas while also minimising exposure to existing sources of poor air quality. It requires planners, designers, architects and air quality experts to demonstrate what measures have been taken during the design stages to achieve the best possible outcomes for air quality.

²⁷ HM Government (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (see <https://www.legislation.gov.uk/ukksi/2017/407/contents>)

²⁸ HM Government (1990). Environmental Protection Act 1990. (see <https://www.legislation.gov.uk/ukpga/1990/43/contents>)

²⁹ Defra (1990). The Environmental Protection Act 1990: Part 2A: Contaminated Land Statutory Guidance (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf)

³⁰ HM Government (2016) The Private Water Supplies (England) Regulations 2016 (see <https://www.legislation.gov.uk/ukksi/2016/618/contents>)

³¹ Greater London Authority (GLA) (2021) The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

³² GLA (2023) Air Quality Positive (AQP) guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance>)

B.31 Air Quality Neutral (AQN) guidance (2023)³³ sets air quality benchmarks for all development, in order to ensure that their transport and building emissions do not worsen air quality in London. The guidance also outlines a simplified approach for minor developments.

B.32 The Control of Dust and Emissions Supplementary Planning Guidance (SPG) (2021)³⁴ seeks to reduce emissions of dust, PM₁₀ and PM_{2.5} from construction and demolition activities in London. It also aims to control nitrogen oxides (NO_x) from these same activities by introducing an Ultra Low Emissions Zone (ULEZ) for non-road mobile machinery.

B.33 The Thames River Basin Management Plan (2022)³⁵ seeks to manage and protect the Thames River Basin's water resources and aquatic ecosystems. It outlines measures and actions to achieve specific environmental objectives, focusing on water quality improvement, ecological health, and sustainable water use. The Plan incorporates various stakeholders and sectors to collaboratively address water-related challenges and maintain a healthy and sustainable water environment.

B.34 The London Environment Strategy (2018)³⁶ seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

Biodiversity

International

B.35 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021)³⁷ is an international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.36 The 2030 Agenda for Sustainable Development (2015)³⁸ adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 13: Climate Action;
- SDG 14: Life Below Water; and
- SDG 15: Life on Land.

B.37 The Habitats Directive (1992)³⁹ aims to protect over a thousand species, including mammals, reptiles, amphibians, fish invertebrates and plants, and 230 characteristic habitat types. The overall objective is to ensure that these species and habitat types are maintained, or restored, to a favourable conservation status within the EU. In addition to halting the further decline or disappearance of these species and habitats, the Directive aims to allow them to recover and thrive over the long-term.

B.38 The International Convention on Biological Diversity (1992)⁴⁰ is an international commitment to biodiversity conservation through national strategies and action plans.

³³ GLA (2023) Air Quality Neutral (AQN) guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-neutral-aqn-guidance>)

³⁴ GLA (2021) Control of Dust and Emissions. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/control-dust-and>)

³⁵ Environment Agency (2022) Thames River Basin District River Basin Management Plan. (see <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>)

³⁶ GLA (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

³⁷ COP26 United Nations Declaration on Forests and Land Use (2021)

³⁸ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

³⁹ European Commission (1992). The Habitats Directive (see https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en)

⁴⁰ Convention on Biological Diversity (1992). International Convention on Biological Diversity (see <https://jncc.gov.uk/our-work/convention-on-biological-diversity/#:~:text=As%20the%20first%20global%20treaty,the%20use%20of%20genetic%20resources.>)

B.39 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)⁴¹ aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.40 International Convention on Wetlands (Ramsar Convention) (1976)⁴² an international agreement with the aim of conserving and managing the use of wetlands and their resources.

National

B.41 A requirement of the **NPPF's** (2024)⁴³ environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity and using natural resources prudently. In support of this aim the framework states that Local Plans should *“identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks”* and should also *“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”*.

B.42 The framework requires that plans should take a strategic approach in terms of “maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

B.43 The NPPF is supported by Planning Practice Guidance relating to:

- **Natural environment** (2025)⁴⁴ explains key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.

B.44 The **Climate and Nature Bill** (2024)⁴⁵ is a proposed piece of legislation aimed at addressing the climate and ecological crises by setting legally binding targets to limit global heating and restore nature. It seeks to ensure that the UK does its fair share in reducing greenhouse gas emissions in line with the most up-to-date science, aiming to keep global temperature rises below 1.5°C. The bill also emphasises protecting and restoring biodiversity, requiring the government to develop and implement a strategy for nature recovery. A key aspect is the inclusion of a citizens’ assembly to guide decision-making, ensuring public involvement in shaping climate and nature policies. The bill proposes stricter accountability measures, obliging the government to take action beyond existing net-zero commitments and biodiversity targets. It has gained support from environmental groups, scientists, and some MPs, though it has not yet been passed into law.

B.45 The **Air Quality Strategy for England** (2023)⁴⁶ sets out local authorities powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

B.46 The **Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water** (2023)⁴⁷ sets out numerous actions Defra will be taking to clean up waters and ensure a plentiful supply for the future.

⁴¹ Council of Europe (1979). Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (see <https://www.coe.int/en/web/bern-convention#:~:text=The%20Council%20of%20Europe's%20Convention,to%20act%20on%20nature%20conservation.>)

⁴² Ramsar Convention on Wetlands of International Importance (1976) (see <https://jncc.gov.uk/our-work/convention-on-wetlands/>)

⁴³ MHCLG (2024). National Planning Policy Framework. (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

⁴⁴ MHCLG (2025). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

⁴⁵ UK Parliament (2025) Climate and Nature Bill. (see <https://bills.parliament.uk/bills/3707>)

⁴⁶ Defra (2023) The air quality strategy for England (see <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england>)

⁴⁷ Defra (2023) Plan for Water: our integrated plan for delivering clean and plentiful water (see <https://www.gov.uk/government/publications/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water/plan-for-water-our-integrated-plan-for-delivering-clean-and-plentiful-water>)

B.47 The Green Infrastructure Framework (2023)⁴⁸ provides a framework for creating nature-rich towns and cities. The Green Infrastructure Framework will help increase the amount of green cover to 40% in urban residential areas.

B.48 The Environment Act 2021⁴⁹ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.49 Clean Air Strategy 2019 (2019)⁵⁰ sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2030. The goal is to reduce the harm to human health from air pollution by half.

B.50 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019⁵¹ protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.51 The key areas of the 25 Year Environment Plan (2018)⁵² of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes, securing clean, productive and biologically diverse seas and oceans, and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.

⁴⁸ Natural England (2023) Green Infrastructure Framework (see

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>)

⁴⁹ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

⁵⁰ Defra (2019). Clean Air Strategy. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)

⁵¹ HM Government (2019). The Conservation of Habitats and Species Regulations. (see

<https://www.legislation.gov.uk/ukdsi/2019/9780111176573/schedules>)

⁵² HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK’s seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

B.52 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)⁵³ provides the Government’s ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.53 Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services (2011)⁵⁴ seeks to halt biodiversity loss, support health well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

B.54 The Natural Choice: Securing the Value of Nature (2011)⁵⁵ seeks to establish a clear framework for achieving nature recovery. This will be achieved by establishing local Nature Partnerships to strengthen local action, new Nature Improvement Areas to enhance and reconnect nature on a significant scale and through reforms in the planning system to take a strategic approach to planning for nature within and across local areas.

B.55 The Wild Birds Directive (2009)⁵⁶ requires all Member States to protect all wild bird species and protect and restore their habitats.

B.56 The England Biodiversity Strategy Climate Change Adaptation Principles (2008)⁵⁷ sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpins all of these.

B.57 The Natural Environment and Rural Communities Act 2006⁵⁸ places a duty on public bodies to conserve biodiversity.

Sub-national

B.58 The London Plan (2021)⁵⁹ seeks to ensure that green space designations remain strong to protect the environment and improve biodiversity. The Plan states that it seeks to "*protect and enhance London’s open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains*".

⁵³ Defra (2017). UK plan for tackling roadside nitrogen dioxide concentrations. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf)

⁵⁴ Defra (2011). Biodiversity 2020L A Strategy for England’s Wildlife and Ecosystem Services. (see <https://assets.publishing.service.gov.uk/media/5a78c263ed915d04220651ea/pb13583-biodiversity-strategy-2020-111111.pdf>)

⁵⁵ HM Government (2011). The Natural Choice: Securing the Value of Nature. (see <https://assets.publishing.service.gov.uk/media/5a7cb8fce5274a38e57565a4/8082.pdf>)

⁵⁶ European Commission (2009). The Birds Directive.(see https://environment.ec.europa.eu/topics/nature-and-biodiversity/birds-directive_en)

⁵⁷ Defra (2008). The England Biodiversity Strategy Climate Change Adaptation Principles. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-ebc-ccap-081203.pdf)

⁵⁸ HM Government (2006). Natural Environment and Rural Communities Act 2006. (see: <https://www.legislation.gov.uk/ukpga/2006/16/contents>)

⁵⁹ GLA (2021) The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

B.59 The London Environment Strategy (2018)⁶⁰ seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

B.60 The All London Green Grid (2015)⁶¹ policy framework comprises the London Plan policies on green infrastructure and urban greening - and those relating to open spaces, biodiversity, trees and woodland, and river corridors – plus the All London Green Grid Supplementary Planning Guidance and a series of All London Green Grid Area Frameworks.

B.61 The Tree and Woodland Strategies SPG (2013)⁶² provides guidance on the London Plan policies regarding trees and woodland, providing a step-by-step approach to their management.

B.62 Urban Greening Factor (UGF) guidance (2023)⁶³ helps support boroughs and applicants in meeting the requirements of Policy G5: Urban greening (London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design). It provides guidance to boroughs to inform the local application of the policy and information to help applicants to apply the UGF to proposed developments.

B.63 The Lee Valley Regional Park Biodiversity Action Plan 2019-2029 (n.d.)⁶⁴ provides a framework for biodiversity action for the regional park. The overarching vision of the Plan is *"to work with partners and communities to conserve, create, restore and enhance the habitats of the Regional Park, providing access to and appreciation of this area"*.

Climate change adaptation and mitigation

International

B.64 United Nations Paris Climate Change Agreement (2015)⁶⁵ is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.65 The 2030 Agenda for Sustainable Development (2015)⁶⁶ is an initiative adopted by all United Nations Member States to provide a shared blueprint for peace and prosperity for people and the planet, and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SGD 7: Affordable and Clean Energy;
- SDG 11: Sustainable Cities and Communities;
- SDG 12: Responsible Consumption and Production;
- SDG 13: Climate Action;
- SDG 14: Life Below Water; and
- SDG 15: Life on Land.

⁶⁰ GLA (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

⁶¹ GLA (2015) (see <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/environment-publications/all-london-green-grid#:~:text=The%20All%20London%20Green%20Grid,series%20of%20ALGG%20Area%20Frameworks.>)

⁶² GLA (2013). Tree and woodland strategies. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland>)

⁶³ GLA (2023). Urban Greening Factor (UGF) guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/urban-greening-factor-ugf-guidance>)

⁶⁴ Lee Valley Regional Park Authority (2019). Lee Valley Regional Park's Biodiversity Action Plan 2019-2029. (see <https://www.leevalleypark.org.uk/biodiversity-action-plan>)

⁶⁵ United Nations Climate Change (2015) The Paris Agreement (see <https://unfccc.int/process-and-meetings/the-paris-agreement>)

⁶⁶ United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

National

B.66 The **NPPF (2024)**⁶⁷ contains as part of its environmental objective a requirement to mitigate and adapt to climate change, “*including moving to a low carbon economy*”. The document also states that the “*planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change*”. To achieve these aims, new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

B.67 The revised framework also requires that development be directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the “*development should be made safe for its lifetime without increasing flood risk elsewhere*”.

B.68 In relation to coastal change in England, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should “*reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast*”.

B.69 The NPPF is supported by Planning Practice Guidance relating to:

- **Flood risk and coastal change (2022)**⁶⁸ provides guidance on how the planning process can assess, avoid, manage and mitigate the risks associated with flooding and coastal change.
- **Climate change (2019)**⁶⁹ advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.
- **Renewable and low carbon energy (2023)**⁷⁰ outlines guidance for developing a strategy for renewable and low carbon energy, and particular planning considerations for hydropower, solar technology, solar farms, wind turbines and battery energy storage systems.

B.70 The **Clean Power 2030 Action Plan (2024)**⁷¹ aims to secure a fully clean electricity system by 2030, enhancing energy security, reducing fossil fuel reliance, and cutting emissions. It focuses on expanding renewables, improving grid infrastructure, accelerating planning, and fostering investment through Great British Energy. Flexible energy solutions like battery storage and hydrogen aim to support stability, while regulatory reforms aim to lower consumer bills. With £40 billion in annual investment, the plan aims to drive economic growth, job creation, and long-term sustainability, as well as position the UK as a leader in renewable energy and advancing the net-zero transition.

B.71 The **Policy Statement on Onshore Wind (2024)**⁷² outlines a commitment to double onshore wind energy capacity by 2030. To achieve this, the policy removes previous planning restrictions specific to onshore wind projects in England, placing them on equal footing with other energy developments within the NPPF. This change aims to boost Britain's energy independence, reduce energy bills, support high-skilled jobs, and address the climate crisis. The government also plans to consult on incorporating large onshore wind proposals into the Nationally Significant Infrastructure Project regime to expedite their approval process.

B.72 The **Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting (2023)**⁷³ sets out a series of actions for the following sectors over a 5-year period:

⁶⁷ MHCLG (2024) National Planning Policy Framework (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

⁶⁸ MHCLG (2022). Flood risk and coastal change. (see <https://www.gov.uk/guidance/flood-risk-and-coastal-change>)

⁶⁹ Defra (2019). Climate change. (see <https://www.gov.uk/guidance/climate-change>)

⁷⁰ MHCLG (2023). Renewable and low carbon energy. (see <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>)

⁷¹ Department for Energy Security and Net Zero (2024) Clean Power 2030 Action Plan (see: <https://www.gov.uk/government/publications/clean-power-2030-action-plan>)

⁷² Ministry of Housing, Communities and Local Government, HM Treasury, Department for Energy Security and Net Zero and Department for Levelling Up, Housing and Communities (2024) Policy statement on onshore wind (see: <https://www.gov.uk/government/publications/policy-statement-on-onshore-wind/policy-statement-on-onshore-wind>)

⁷³ HM Government (2023). The National Adaptation Programme and the Fourth Strategy for Climate Adaptation Reporting.(see https://assets.publishing.service.gov.uk/media/64ba74102059dc00125d27a7/The_Third_National_Adaptation_Programme.pdf)

- Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning Policy Framework to support both adaptation and mitigation efforts and provide local climate projections
- Business and industry - Green Finance Strategy 2023, new strategy on supply chains and imports and survey business readiness for climate impacts.
- International impacts – the government will adapt and build resilience in vulnerable communities to climate related disasters and continue to drive international action and consensus in negotiations on climate adaptation.

B.73 The Carbon Budget Delivery Plan (2023)⁷⁴ explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets;
- the contribution of these proposals and policies to sustainable development; and
- the impact the package has on sectors of the economy.

B.74 Powering up Britain (2023)⁷⁵ is a collection of policy documents relating to climate change, setting out the department's approach to energy security and net zero. In particular, Powering up Britain includes four key areas of action:

- decarbonising electricity generation;
- improving energy efficiency;
- electrifying transport; and
- and developing low-carbon heating

B.75 The Energy Security Plan (2023)⁷⁶ sets out the steps that the government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

- Looking at the role gas storage and other sources of flexibility can play in gas security;
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme;
- Extension of the Boiler Upgrade Scheme to 2028; and
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects, launching a process to expand Track-1 clusters and establishing two further (Track-2) CCUS clusters.
- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.

⁷⁴ Department for Energy Security and Net Zero (2023). Carbon Budget Delivery Plan. (see <https://www.gov.uk/government/publications/carbon-budget-delivery-plan>)

⁷⁵ Department for Energy Security and Net Zero (2023). Powering up Britain. (see <https://www.gov.uk/government/publications/powering-up-britain>)

⁷⁶ Ibid

- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

B.76 The **Net Zero Growth Plan (2023)**⁷⁷ outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Publishing an addendum to the Resources and Waste Strategy which will focus on net zero and include a plan to achieve the near elimination of biodegradable municipal waste going to landfill.
- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme 'Maximising Resources, Minimising Waste'.
- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate, publishing the Low Carbon Fuels Strategy in 2023, and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.
- Consulting on transition planning disclosure requirements for the UK's largest companies and the UK Green Taxonomy, as well as on steps and interventions needed to support the growth of high integrity voluntary markets and to protect against greenwashing.
- Introducing a regulatory framework for heat networks, beginning the implementation of heat network zoning by 2025, and confirming funding of £15 million for the 2023/24 Home Decarbonisation Skills Competition and the £5 million Heat Training Grant for heat pump and heat network skills. Growth and decarbonisation of the UK heat network market will continue through the Green Heat Network Fund and the Heat Network Efficiency Scheme, including £220 million for the Heat Network Transformation Programme over 2025/6 and 2026/7.
- Considering options for integrating greenhouse gas removals in the UK Emissions Trading Scheme.
- Publishing the Biomass Strategy in 2023, which will outline the role that bioenergy with carbon capture and storage (BECCS) can play in reducing carbon emissions.
- Taking forward the next steps in the Review of Electricity Market Arrangements.

B.77 The **Biomass Strategy 2023**⁷⁸ builds on the 2021 Biomass policy statement and the Powering up Britain strategy which emphasised the important role that biomass will play in Britain's fully decarbonised power system by 2035, subject to security of supply. It sets out steps government intends to take to strengthen biomass sustainability and the opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target.

B.78 The government aims to focus on implementing a cross-sectoral common sustainability framework, which will be subject to consultation. It states it committed to monitoring the levels of biomass supply to ensure the UK can secure necessary levels for increased biomass use across the economy.

B.79 It has also committed to ensuring that biomass supply – given its risks and uncertainties – is not hindered at any stage; however, biomass demand is expected to increase. The government also aims for a "priority use" of biomass based on guiding principles that address sustainability, air quality, the net-zero and circular economy, and resource efficiency. This encompasses the deployment of bioenergy with carbon capture and storage (BECCS), the engineered greenhouse-gas removal technology, which captures and stores CO₂ from biomass while producing low-carbon energy.

⁷⁷ Ibid

⁷⁸ Department for Energy Security and Net Zero (2023). Biomass Strategy 2023. (see <https://www.gov.uk/government/publications/biomass-strategy>)

B.80 The **Levelling-up and Regeneration Act 2023**⁷⁹ make provision for the setting of levelling-up missions and reporting on progress in delivering them; about local democracy; about town and country planning; about Community Infrastructure Levy; about the imposition of Infrastructure Levy; about environmental outcome reports for certain consents and plans; about nutrient pollution standards; about regeneration; about the compulsory purchase of land; about information and records relating to land, the environment or heritage; about the registration of short-term rental properties; for the provision for pavement licences to be permanent; about governance of the Royal Institution of Chartered Surveyors; about the charging of fees in connection with marine licences; for a body to replace the Health and Safety Executive as the building safety regulator; about the transfer of land for Academy schools; about the review of maps of open country and registered common land; about the regulation of childminding; about qualifying leases under the Building Safety Act 2022; about road user charging schemes in London; about National Parks, areas of outstanding natural beauty and the Broads; and for connected purposes.

B.81 The **Energy Act (2023)**⁸⁰ makes provision about energy production and security and the regulation of the energy market.

B.82 The **Heat and Buildings Strategy (2021)**⁸¹ sets out the Government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This Strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the Strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.

⁷⁹ GM Government (2023). Levelling-up and Regeneration Act 2023. (see <https://www.legislation.gov.uk/ukpga/2023/55>)

⁸⁰ HM Government (2023). Energy Act 2023. (see <https://www.legislation.gov.uk/ukpga/2023/52#:~:text=An%20Act%20to%20make%20provision,and%20transportation%3B%20about%20new%20technology%2C>)

⁸¹ Department for Business, Energy & Industrial Strategy (2021). Heat and Buildings Strategy. (see <https://www.gov.uk/government/publications/heat-and-buildings-strategy>)

- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning, Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.83 The Net Zero Strategy: Build Back Greener (2021)⁸² sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.84 The British Energy Security Strategy (2022)⁸³ sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from four years to one year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas – a licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.

B.85 UK Climate Change Risk Assessment (2017)⁸⁴ sets out six priority areas needing urgent further action over the next five years. These include:

- flooding and coastal change risks to communities, businesses and infrastructure;
- health, well-being and productivity from high temperatures;
- shortages in public water supply, and for agriculture, energy generation and industry with impacts on freshwater ecology;
- natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- domestic and international food production and trade; and
- new and emerging pests and diseases and invasive non-native species affecting people, plants and animals.

⁸² Department for Business, Energy and Industrial Strategy (2021). Net Zero Strategy: Build Back Greener. (see <https://www.gov.uk/government/publications/net-zero-strategy>)

⁸³ Department for Business, Energy & Industrial Strategy and Prime Minister's Office, 10 Downing Street (2022) British energy security strategy (see <https://www.gov.uk/government/publications/british-energy-security-strategy>)

⁸⁴ HM Government (2017). UK Climate Change Risk Assessment 2017. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

B.86 The UK Hydrogen Strategy (2021)⁸⁵ sets out the Government's approach to developing a thriving low carbon hydrogen sector in the UK, with the ambition for 5GW of capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

B.87 The Energy Performance of Buildings Regulations 2021⁸⁶ seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.88 The Industrial Decarbonisation Strategy (2021)⁸⁷ aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the Government's vision for the manufacturing and construction sector and is part of the Government's path to net zero by 2050.

B.89 The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next 30 years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes – approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.90 The Environment Act 2021⁸⁸ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.

⁸⁵ Department for Business, Energy & Industrial Strategy (2022) UK Hydrogen Paper (see <https://www.gov.uk/government/publications/uk-hydrogen-strategy>)

⁸⁶ HM Government (2021). The Energy Performance of Buildings Regulations. (see <https://www.legislation.gov.uk/uksi/2012/3118/contents/made>).

⁸⁷ Department for Business, Energy & Industrial Strategy (2021) Industrial decarbonisation strategy (see <https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>)

⁸⁸ HM Government (2021) Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

B.91 The Waste (Circular Economy) (Amendment) Regulations 2020⁸⁹ amend a range of legislation to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.92 The Energy White Paper: Powering Our Net Zero Future (2020)⁹⁰ builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050. Key aims of the paper include:

- Supporting green jobs – The Government aims to support up to 220,000 jobs in the next 10 years. Several will be supported via a "major programme" that will see the retrofitting of homes for improved energy efficiency and clean heat.
- Transforming the energy system – To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable – The Government aims to do this by making the energy retail market "truly competitive". This will include offering people a simple method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle "loyalty penalties".
- Generating emission-free electricity by 2050 – The Government aims to have "overwhelmingly decarbonised power" in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme – The Government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1st January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options – The Government said it is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind – The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments – Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy – The Government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points – The Government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars, including for the mass-production of the batteries needed for electric vehicles.
- Supporting the lowest paid with their bills – The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400.

⁸⁹ HM Government (2020) The Waste (Circular Economy) (Amendment) Regulations 2020 (see <https://www.legislation.gov.uk/ukksi/2020/904/contents/made>)

⁹⁰ Department for Business, Energy & Industrial Strategy (2020). Energy white paper: Powering our net zero future. (see <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future>)

This includes extending the Warm Home Discount Scheme to 2026 to cover an extra three quarters of a million households and giving eligible households £150 off their electricity bills each winter.

- Moving away from fossil fuel boilers – The Government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition – The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The Government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing carbon capture and storage, and hydrogen production to provide new green jobs for the future.

B.93 The 25 Year Environment Plan (2018)⁹¹ sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Actions relating to climate change are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

B.94 National Planning Policy for Waste (NPPW) (2014)⁹²: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns.
- Provide a framework in which communities take more responsibility for their own waste.
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.
- Ensure the design and layout of new development supports sustainable waste management.

B.95 The Energy Efficiency Strategy (2012)⁹³ aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.96 The Flood and Water Management Act 2010⁹⁴ and The Flood and Water Regulations 2019⁹⁵ set out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

⁹¹ HM Government, 2018. A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

⁹² Department for Communities and Local Government (2014). National Planning Policy for Waste. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)

⁹³ Department of Energy and Climate Change (2012). The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf)

⁹⁴ HM Government (2010). Flood and Water Management Act. (see <https://www.legislation.gov.uk/ukpga/2010/29/contents>)

⁹⁵ HM Government (2019). The Flood and Water Regulations. (see <https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents>)

B.97 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)⁹⁶ sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk; preparing for the future; limiting the severity of future climate change through a new international climate agreement; building a low carbon UK; and supporting individuals, communities and businesses to play their part.

B.98 The UK Renewable Energy Strategy (2009)⁹⁷ describes the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

B.99 The Climate Change Act 2008⁹⁸ sets targets for UK greenhouse gas emission reductions of at least 80% by 2050, against a 1990 baseline.

B.100 The Planning and Energy Act 2008⁹⁹ enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

Sub-national

B.101 The Enfield Council Climate Action Plan (2024)¹⁰⁰ sets out a comprehensive strategy to achieve carbon neutrality for Council operations by 2030 and borough-wide by 2040. It focuses on improving building energy efficiency, promoting a circular economy through waste reduction and recycling, and enhancing climate resilience with flood mitigation and green space restoration. The plan also prioritises social equity by creating green jobs and tackling inequality. By integrating environmental, social, and economic goals, the Council aims to build a sustainable and resilient future for Enfield.

B.102 The London Plan (2021)¹⁰¹ promotes the move towards a zero-carbon city by 2050 through achieving sustainable development and addressing both climate change and its consequences. Amongst the promotion of natural solutions such as green infrastructure and sustainable drainage systems, the Plan provides opportunities to increase energy efficiency, including through the use of smart technologies, and utilising low carbon energy sources. It further promotes creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste.

B.103 The London Environment Strategy (2018)¹⁰² seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

B.104 'Be Seen' energy monitoring guidance (2021)¹⁰³ explains how developers and owners of new major developments should monitor and report actual operational energy performance to comply with London Plan Policy SI 2: Minimising greenhouse gas emissions, i.e. the 'be seen' element of the energy hierarchy. The guidance works towards bridging the 'performance gap' between design theory and actual energy use.

B.105 Circular Economy Statement Guidance (2022)¹⁰⁴ puts circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their

⁹⁶ HM Government (2009). The UK Low Carbon Transition Plan. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)

⁹⁷ HM Government (2009). The UK Renewable Energy Strategy. (see <https://www.gov.uk/government/publications/the-uk-renewable-energy-strategy>)

⁹⁸ HM Government (2008). Climate Change Act 2008. (see https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf)

⁹⁹ HM Government (2008). Planning and Energy Act 2008. (see <https://www.legislation.gov.uk/ukpga/2008/21/section/1>)

¹⁰⁰ Enfield Council (2024) Climate Action Plan 2024 (see: https://www.enfield.gov.uk/_data/assets/pdf_file/0036/58959/climate-action-plan-2024-environment.pdf)

¹⁰¹ GLA (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

¹⁰² GLA (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

¹⁰³ GLA (2021) London Plan Guidance Documents: 'Be Seen' energy monitoring guidance (see https://www.london.gov.uk/sites/default/files/be_seen_energy_monitoring_london_plan_guidance_2021.pdf)

¹⁰⁴ GLA (2022). Circular Economy Statement Guidance. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>)

lifetime. It treats building materials as resources rather than waste, and puts in place a clear hierarchy, prioritising the retention of existing structures above demolition, where this is the more sustainable and appropriate approach.

B.106 The guidance applies to the largest developments in London that are referable to the Mayor, as required by London Plan Policy 2021 SI 7: Reducing waste and supporting the circular economy, however boroughs are encouraged to apply the policies for smaller developments.

B.107 Energy Assessment Guidance (2022)¹⁰⁵ provides information for planning applicants on how to comply with the London Plan climate mitigation policies.

B.108 Carbon Offset Guidance (2022)¹⁰⁶, which is primarily for local authorities, explains how to set up a carbon offset fund and how these funds may be spent.

B.109 Whole Life-Cycle Carbon Assessments Guidance (2022)¹⁰⁷ explains how to comply with the requirement in Policy SI 2: Minimising greenhouse gas emissions (F) for all referable planning applications to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture a development's carbon impact.

Population, communities, health and wellbeing

International

B.110 The 2030 Agenda for Sustainable Development (2015)¹⁰⁸ initiative, adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 1: No Poverty;
- SDG 2: Zero Hunger;
- SDG 3: Good Health and Well-being;
- SDG 4: Quality Education;
- SDG 5: Gender Equality;
- SDG 10: Reduced Inequalities; and
- SDG 11: Sustainable Cities and Communities.

B.111 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)¹⁰⁹ sets the broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.112 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998)¹¹⁰ establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

¹⁰⁵ GLA (2022). Energy Assessment Guidance. (see <https://www.london.gov.uk/media/12774/download?attachment>)

¹⁰⁶ GLA (2022). Carbon Offset Guidance. (see https://www.london.gov.uk/sites/default/files/gla_carbon_offsetting_guidance_2022.pdf)

¹⁰⁷ GLA (2022). Whole Life-Cycle Carbon Assessments guidance. (see https://www.london.gov.uk/sites/default/files/lpg_-_wlca_guidance.pdf)

¹⁰⁸ United Nations Department of Economic and Social Affairs (2015) The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

¹⁰⁹ United Nations (2002) Declaration on Sustainable Development (Johannesburg Declaration). (see https://www.un.org/esa/sustdev/documents/WSSD_POI_PD/English/POI_PD.htm)

¹¹⁰ United Nations (1998) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters. (see <https://unece.org/DAM/env/pp/documents/cep43e.pdf>)

B.113 The **Declaration on Forests and Land Use (COP26 Declaration)** (2021)¹¹¹ is an international commitment to halt and reverse forest loss and land degradation by 2030, while delivering sustainable development and promoting an inclusive rural transformation.

National

B.114 The **NPPF** (2024)¹¹² includes as part of its social objective the promotion of “*strong, vibrant and healthy communities*” by:

- “*ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and*
- *by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being*”.

B.115 Ultimately planning policies and planning decision making should “aim to achieve healthy, inclusive and safe places”.

B.116 The document also promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which “*promote social interaction [and] enable and support healthy lives*”.

B.117 As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- “*plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs*”.

B.118 Plan-making through the guidance of the NPPF recognises the important role of access to open spaces and other facilities which provide opportunities for sport and physical activity in terms of the health and wellbeing of communities. The importance of delivering a sufficient choice of school places to meet the needs of existing and new communities is also recognised in the document and local planning authorities should take a “*proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education*”.

B.119 The NPPF is supported by Planning Practice Guidance relating to:

- **Housing needs of different groups** (2021)¹¹³ provides advice on planning for affordable, private rented, self-build, student and rural housing needs.
- **Healthy and safe communities** (2022)¹¹⁴ provides guidance on achieving healthy, safe and inclusive communities, estate regeneration and school place provision.
- **Noise** (2019)¹¹⁵ advises on how planning can manage potential noise impacts in new development.
- **Light pollution** (2019)¹¹⁶ advises on how to consider artificial light within the planning system.

¹¹¹ United Nations (2021). Declaration on Forests and Land Use. (see <https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>)

¹¹² MHCLG (2024). National Planning Policy Framework. (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

¹¹³ MHCLG (2021). Housing needs of different groups. (see <https://www.gov.uk/guidance/housing-needs-of-different-groups>)

¹¹⁴ MHCLG (2022). Healthy and Safe communities. (see <https://www.gov.uk/guidance/health-and-wellbeing>)

¹¹⁵ MHCLG (2019). Noise. (see <https://www.gov.uk/guidance/noise--2>)

¹¹⁶ MHCLG (2019). Light pollution. (see <https://www.gov.uk/guidance/light-pollution>)

- **Open space, sports and recreation facilities, public rights of way and local green space (2014)**¹¹⁷ provides key advice on open space, sports, recreation, public rights of way, National Trails and the Local Green Space designation.

B.120 Planning Policy for Traveller Sites (2024)¹¹⁸ outlines objectives to ensure fair treatment of Gypsies, Travellers and Travelling Showpeople while respecting the interests of the settled community. Local planning authorities are encouraged to assess and address the need for Gypsy, Traveller and Travelling Showperson sites collaboratively, developing fair strategies and identifying appropriate land. The policy emphasises protecting the Green Belt from inappropriate development, promoting private site provision, and reducing unauthorised developments through effective planning and enforcement. This policy should be read alongside the National Planning Policy Framework to guide local authorities in plan-making and decision-taking regarding Gypsy, Traveller and Travelling Showperson sites.

B.121 The Policy Statement on New Towns (2024)¹¹⁹ outlines a strategic vision to stimulate economic growth and enhance living standards by constructing 1.5 million new homes during the current parliamentary term. Central to this initiative is the development of large-scale communities, each comprising at least 10,000 homes, through both standalone new towns on greenfield sites and significant urban extensions or regeneration projects. These developments aim to address housing demand, alleviate constraints in existing urban areas, and align with national infrastructure plans. To ensure these new towns are well-connected, sustainable, and desirable places to live, the government has introduced a 'New Towns Code' mandating high standards of design and infrastructure, with a target of 40% affordable housing, focusing on social rented homes.

B.122 The Levelling Up and Regeneration Act (2023)¹²⁰ sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process while attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.123 The Homes England Strategic Plan 2023 to 2028 (2023)¹²¹ sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.124 Build Back Better: Our Plan for Health and Social Care (2021)¹²² sets out the Government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.125 Using the planning system to promote healthy weight environments (2020)¹²³, **Addendum (2021)**¹²⁴ provides a framework and starting point for local authorities to clearly set out in local planning

¹¹⁷ MHCLG (2014). Open space, sports and recreation facilities, public rights of way and local green space. (see

<https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>)

¹¹⁸ MHCLG (2024) Planning policy for traveller sites. (see: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites#full-publication-update-history>)

¹¹⁹ MHCLG (2024) Policy statement on new towns (see <https://www.gov.uk/government/publications/policy-statement-on-new-towns/policy-statement-on-new-towns>)

¹²⁰ UK Parliament (2023). Levelling Up and Regeneration Act. (see <https://bills.parliament.uk/bills/3155>)

¹²¹ Homes England (2023). Strategic Plan 2023 to 2028. (see

<https://assets.publishing.service.gov.uk/media/646f58f6ab40bf000c196a74/Homes-England-strategic-plan-2023-to-2028.pdf>)

¹²² Department of Health and Social Care (2021). Build Back Better: Our Plan for Health and Social Care. (see

<https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care>)

¹²³ Public Health England (2020). Guidance and supplementary planning document template for local authority public health and planning teams. (<https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system>)

¹²⁴ Public Health England (2021). Addendum: Hot food takeaways use in the new Use Class Order.

(<https://www.gov.uk/government/publications/healthy-weight-environments-using-the-planning-system/addendum-hot-food-takeaways-use-in-the-new-use-class-order>)

guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1st September 2020.

B.126 National Design Guide (2021)¹²⁵ sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan.

B.127 COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)¹²⁶ sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing, to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes and, to support services to meet the need for specialist support.

B.128 Public Health England, PHE Strategy 2020-25 (2019)¹²⁷ identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.129 The 25 Year Environment Plan (2018)¹²⁸ sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The document identifies six key areas upon which action will be focused. Those of relevance to the topics of population growth, health and wellbeing are 'using and managing land sustainably' and 'connecting people with the environment to improve health and wellbeing':

- Using and managing land sustainably:
 - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
 - Help people improve their health and wellbeing by using green spaces including through mental health services.
 - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.

B.130 The Environmental Noise Regulations (2018)¹²⁹ apply to environmental noise, mainly from transport. The Regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

B.131 Select Committee on Public Service and Demographic Change report Ready for Ageing? (2013)¹³⁰ warns that society is underprepared for the ageing population. The report states "*longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent*

¹²⁵ Ministry of Housing, Communities and Local Government (2021). National Design Guide. (see <https://www.gov.uk/government/publications/national-design-guide>)

¹²⁶ Department for Health and Social Care and Cabinet Office (2021). COVID-19 mental health and wellbeing recovery action plan. (see <https://www.gov.uk/government/publications/covid-19-mental-health-and-wellbeing-recovery-action-plan>)

¹²⁷ Public Health England (2019). PHE Strategy 2020-25. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)

¹²⁸ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

¹²⁹ HM Government (2018). The Environmental Noise (England) Regulations

¹³⁰ Select Committee on Public Service and Demographic Change (2013). Ready for Ageing? (see <https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>)

action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.132 Fair Society, Healthy Lives (2011)¹³¹ investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "*overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities*". **Marmot Review 10 Years On** (2020)¹³² revisits Fair Society, Healthy Lives. It found that, since 2010, life expectancy in England has stalled, which suggests society has stopped improving. In addition, there are marked regional differences in life expectancy – the more deprived the area, the shorter the life expectancy. Mortality rates are increasing in those aged 45-49, child poverty has increased and there is a housing crisis and rise in homelessness.

B.133 Healthy Lives, Healthy People: Our strategy for public health in England (2010)¹³³ sets out how our approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it.
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.

B.134 Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.135 Countryside and Rights of Way Act 2010¹³⁴: An Act of Parliament to make new provision for public access to the countryside.

Sub-national

B.136 Enfield Council's **Council Plan 2023 to 2026** (2023)¹³⁵ outlines the borough's priorities for improving local services and infrastructure, focusing on environment, community wellbeing, housing, children and young people, and inclusive economic growth. It addresses key local challenges through principles of fairness, sustainability, and collaboration, aiming to deliver measurable improvements over the long term.

B.137 Enfield Council's draft **Joint Local Health and Wellbeing Strategy 2024-2030**(2023)¹³⁶ aims to improve health and wellbeing across all life stages. It focuses on giving children the best start in life, supporting adults in making healthier choices, and enabling older people to live independently for longer. Key priorities include promoting early development, preventing chronic conditions, enhancing mental wellbeing, and creating healthy environments. The strategy is guided by principles of reducing health

¹³¹ Marmot, M (2011). Fair Society, Healthy Lives: The Marmot Review.

¹³² Institute of Health Equity (2020) Health Equity in England: The Marmot Review 10 Years On. (see <https://www.instituteofhealthequity.org/resources-reports/marmot-review-10-years-on>)

¹³³ HM Government (2010). Healthy Lives, Healthy People: Our strategy for public health in England. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf)

¹³⁴ HM Government (2010). Countryside and Rights of Way Act 2010. (see <https://www.legislation.gov.uk/ukpga/2000/37/section/85>)

¹³⁵ Enfield Council (2023) Investing in Enfield: Enfield Council Plan 2023-26 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)

¹³⁶ Enfield Council (2023) draft Joint Local Health and Wellbeing Strategy 2024-2030 (see: <https://governance.enfield.gov.uk/documents/s101419/Appendix%201%20JHWP%20Strategy%202024-2030%20for%20Consultation%20Paper.pdf>)

inequalities, prioritising prevention, empowering communities, fostering collaboration, and ensuring sustainable services. Regular action plans will ensure it remains adaptable to evolving health needs.

B.138 The London Plan (2021)¹³⁷ recognises that London is made up of diverse communities, and seeks to accommodate them with inclusive growth. This includes *"the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation"*.

B.139 Accessible London SPG (2014)¹³⁸ provides advice on implementing inclusive design principles effectively, and on creating an accessible environment in London. This SPG has particular emphasis on the access needs of the capital's disabled and older people.

B.140 Planning for Equality and Diversity in London SPG (2007)¹³⁹ sets out some of the overarching principles that should guide planning for equality in London. It also explores how key spatial planning issues can impact upon equality and diversity.

B.141 Social Infrastructure SPG (2015)¹⁴⁰ emphasises the need for planning across services to ensure social infrastructure meets the broader built environment aims of the London Plan. Social infrastructure includes a wide range of services and facilities, including:

- health;
- education;
- community;
- cultural;
- play;
- recreation and sports facilities;
- faith;
- emergency facilities; and
- many other local services and facilities that contribute to quality of life.

Economy and employment

International

B.142 There are no specific international policy agreements under this topic relevant to the preparation of the Enfield Traveller Local Plan and the IIA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with other countries.

National

B.143 The Plan for Change (2024)¹⁴¹ outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets

¹³⁷ GLA (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

¹³⁸ GLA (2014) Shaping neighbourhoods accessible London: achieving an inclusive environment - Supplementary planning guidance (see https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Accessible%20London%202014_4.pdf?token=qk8waMKd)

¹³⁹ GLA (2007) Planning for Equality and Diversity in London: Supplementary Planning Guidance to the London Plan (see https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/archives/mayor-strategies-sds-docs-spg-planning-for-equality.pdf?token=1Svk6LBu)

¹⁴⁰ GLA (2015) Social Infrastructure: Supplementary Planning Guidance (see https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Social%20Infrastructure%20SPG.pdf?token=a-BvX_IN)

¹⁴¹ HM Government (2024) Plan for Change (see https://assets.publishing.service.gov.uk/media/6751af4719e0c816d18d1df3/Plan_for_Change.pdf)

out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

Sub-national

B.144 Enfield Council's **Council Plan 2023 to 2026** (2023)¹⁴² outlines the borough's priorities for improving local services and infrastructure, focusing on environment, community wellbeing, housing, children and young people, and inclusive economic growth. It addresses key local challenges through principles of fairness, sustainability, and collaboration, aiming to deliver measurable improvements over the long term.

Historic environment

International

B.145 Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992)¹⁴³ agreed that the conservation and enhancement of an archaeological heritage is one of the goals of urban and regional planning policy. It is concerned in particular with the need for co-operation between archaeologists and planners to ensure optimum conservation of archaeological heritage.

B.146 The **European Convention for the Protection of the Architectural Heritage of Europe** (1985)¹⁴⁴ defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.147 United Nations (UNESCO) World Heritage Convention (1972)¹⁴⁵ promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

National

B.148 Of relevance to the approach of the planning system to the historic environment the **NPPF** (2024)¹⁴⁶ contains an environmental objective to contribute to the protection and enhancement of the built and historic environment. The document also sets out a strategy to seek "*the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats*". Such a strategy is required to take into consideration the desirability of sustaining and enhancing the significance of heritage assets and bringing them into viable use.

B.149 It should also be considerate of the wider benefits of conserving the historic environment, the contribution new development can make in terms of character and distinctiveness and the opportunity for the historic environment to contribute to this character and distinctiveness. Local authorities should also maintain or have access to a historic environment record which is to be supported by up-to-date evidence.

B.150 The NPPF is supported by Planning Practice Guidance relating to:

- **Historic environment** (2019)¹⁴⁷ advises on enhancing and conserving the historic environment through planning, decision-making, designation, listed building consent processes and consultation.

B.151 Historic England's Corporate Plan (2023)¹⁴⁸ provides the framework for their work specifically identifying six priorities: levelling up; inclusion, diversity and equality; planning, listed, conservation advice

¹⁴² Enfield Council (2023) Investing in Enfield: Enfield Council Plan 2023-26 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/34087/Enfield-Council-Plan-2023-2026-Your-Council.pdf)

¹⁴³ Council of Europe (1992). Valletta Treaty. (<https://rm.coe.int/168007bd25>)

¹⁴⁴ Council of Europe (1985). Convention for the Protection of the Architectural Heritage of Europe. (<https://www.coe.int/en/web/culture-and-heritage/granada-convention>)

¹⁴⁵ General Conference of UNESCO (1972). UNESCO World Heritage Convention. (<https://whc.unesco.org/en/convention/>)

¹⁴⁶ MHCLG (2024) National Planning Policy Framework (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

¹⁴⁷ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2019). Historic Environment. (see <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>)

¹⁴⁸ Historic England (2023) Historic England Corporate Plan 2023-26 (see <https://historicengland.org.uk/about/what-we-do/corporate-plan/>)

and investment; climate action; stewardship of the National Collections; and developing Historic England. Their vision is for a heritage that is valued, celebrated and shared by everyone, and one that people connect with and learn from.

B.152 The Heritage Statement (2017)¹⁴⁹ describes out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.153 The Government's Statement on the Historic Environment for England (2010)¹⁵⁰ sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. It includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.154 The Planning (Listed Buildings & Conservation Areas) Act 1990¹⁵¹ changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.155 Ancient Monuments and Archaeological Areas Act 1979¹⁵² was a law passed by the UK government to protect the archaeological heritage of England, Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

B.156 The Historic Buildings and Ancient Monuments Act 1953¹⁵³ makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Sub-national

B.157 The London Plan (2021)¹⁵⁴ recognises that London's diverse range of designated and non-designated heritage assets contribute to the city's economy, culture and quality of life. The Plan places emphasis on the effective management of the city's heritage and historic environment to achieve good growth. This is demonstrated in policies seeking to encourage new development to better identify, understand, conserve, and enhance the historic environment and heritage assets, and improve access to, and interpret, the heritage assets, landscapes and archaeology within an area.

B.158 There are some important views across the capital, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The London Plan protects these and provides the basis for more detailed guidance on each view. This is called the London View Management Framework (LVMF) and the **London View Management Framework SPG (2021)**¹⁵⁵ produced guidance on this.

B.159 The Enfield Heritage Strategy 2019-2025 (2019)¹⁵⁶ aims to protect and celebrate the borough's heritage while supporting regeneration and economic growth. It focuses on conserving historic assets, integrating heritage into development plans, and ensuring growth aligns with Enfield's historical character.

¹⁴⁹ Department for Digital, Culture Media and Sport (2017). The Heritage Statement 2017. (see <https://www.gov.uk/government/publications/the-heritage-statement-2017>)

¹⁵⁰ HM Government (2010). The Government's Statement on the Historic Environment for England. (see <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>)

¹⁵¹ HM Government (2002). Planning (Listed Buildings & Conservation Areas) Act (1990). (see http://www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf)

¹⁵² HM Government (1979). Ancient Monuments & Archaeological Areas Act. (see <https://consult.environment-agency.gov.uk/engagement/bostonbarriertwao/results/b.21---ancient-monuments-and-archaeological-areas-act-1979.pdf>)

¹⁵³ HM Government (1953). Historic Buildings and Ancient Monuments Act 1953. (see <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>)

¹⁵⁴ GLA (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

¹⁵⁵ GLA (2021). London View Management Framework. (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-view-management>)

¹⁵⁶ Enfield Council (2019) Enfield Heritage Strategy (see <https://www.enfield.gov.uk/services/planning/heritage/heritage-strategy#:~:text=The%20Enfield%20Heritage%20Strategy%20outlines,by%20the%20Covid%2D19%20Pandemic.>)

The strategy also promotes community engagement, recognising the role of local people in preserving and valuing heritage. Initially set for 2019-2024, it has been extended to 2025 to continue its mission, particularly in response to the impact of the COVID-19 pandemic.

B.160 The **London World Heritage Sites SPG** (2012)¹⁵⁷ provides information on understanding World Heritage Sites and their settings in the context of London, information on the elements that contribute to a site's Outstanding Universal Value, to ensure these are conserved and enhanced by developers, policy makers and other stakeholders and provides guidance for assessing the effect of potential development on London's World Heritage Sites and their settings.

Landscape

International

B.161 The **European Landscape Convention** (2000)¹⁵⁸ promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

B.162 The **NPPF** (2024)¹⁵⁹ includes as part of its approach to protecting the natural environment, recognition for the intrinsic character and beauty of the countryside, and the wider benefits to be secured from natural capital. Importantly, great weight is to be given to conserving the landscape and scenic beauty in National Parks, the Broads and National Landscapes (formerly referred to as Areas of Outstanding Natural Beauty or AONB).

B.163 As part of the approach to achieving well-designed places the NPPF states that planning policies and decisions should ensure that developments "*are sympathetic to local character and history, including the surrounding built environment and landscape setting*".

B.164 The NPPF is supported by Planning Practice Guidance relating to:

- **Natural environment** (2025)¹⁶⁰ highlights key issues in implementing policy to protect and enhance the natural environment, agricultural land, soils and brownfield land of environmental value, green infrastructure, biodiversity, geodiversity, ecosystems and landscapes.
- **Green Belt** (2025)¹⁶¹ provides advice on the role of the Green Belt in the planning system, removal of land from the Green Belt and compensatory improvements.

B.165 The **Environment Act 2021**¹⁶² sets out the UK's new framework for environmental protection. It includes the creation of Conservation Covenant agreements between a landowner and a responsible body for the purposes of conservation of the natural environment of the land or its natural resources, or to conserve the place or setting of the land for its "*archaeological, architectural, artistic, cultural or historic interest*".

B.166 The key area in the **25 Year Environment Plan** (2018)¹⁶³ of relevance in terms of the conservation and enhancement of landscape character is recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

¹⁵⁷ GLA (2012) The London World Heritage Sites SPG (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/london-world-heritage>)

¹⁵⁸ Council of Europe (2000). The European Landscape Convention (Florence). (see <https://www.coe.int/en/web/landscape/the-european-landscape-convention>)

¹⁵⁹ MHCLG (2024) National Planning Policy Framework (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

¹⁶⁰ MHCLG (2025). Natural Environment. (see <https://www.gov.uk/guidance/natural-environment>)

¹⁶¹ MHCLG (2025). Green Belt. (see <https://www.gov.uk/guidance/green-belt>)

¹⁶² HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹⁶³ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

B.167 The **Countryside and Rights of Way Act 2010**¹⁶⁴ is an Act of Parliament to make new provision for public access to the countryside.

B.168 The **National Parks and Access to the Countryside Act 1949**¹⁶⁵ is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission, to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves, to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Sub-national

B.169 The **London Plan (2021)**¹⁶⁶ seeks to encourage boroughs and new development to better identify, understand, conserve, and enhance and improve access to valued landscapes and archaeology within an area. The Plan states that "*development should make provision for the protection of significant archaeological assets and landscapes*" and "*development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings*".

Transport and accessibility

International

B.170 The **2030 Agenda for Sustainable Development (2015)**¹⁶⁷ is an initiative adopted by all United Nations Member States that provides a shared blueprint for peace and prosperity for people and the planet, and includes 17 Sustainable Development Goals (SDGs) designed to achieve a better and more sustainable future for all. Relevant to this topic are:

- SDG 9: Industry, Innovation and Infrastructure;
- SDG 11: Sustainable Cities and Communities; and
- SDG 13: Climate Action.

National

B.171 The **NPPF (2024)**¹⁶⁸ requires that "*transport issues should be considered from the earliest stages of plan-making*". The scale, location and density of development should reflect "opportunities from existing or proposed transport infrastructure". To help reduce congestion and emissions and improve air quality and public health the planning system should focus significant development "on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes". The draft revised framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high-quality walking and cycling network.

B.172 While the framework promotes the use and development of sustainable transport networks it also requires that "where there is robust evidence, sites and routes which could be critical in developing

¹⁶⁴ HM Government (2010). Countryside and Rights of Way Act 2010. (see <https://www.legislation.gov.uk/ukpga/2000/37/section/85>)

¹⁶⁵ HM Government (1949). National Parks and Access to the Countryside Act 1949. (see <https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>)

¹⁶⁶ GLA (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

¹⁶⁷ United Nations Department of Economic and Social Affairs (2015). The 2030 Agenda for Sustainable Development. (see <https://sdgs.un.org/2030agenda>)

¹⁶⁸ MHCLG (2024). National Planning Policy Framework (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

infrastructure to widen transport choice and realise opportunities for large scale development” should be identified and protected.

B.173 The NPPF is supported by Planning Practice Guidance relating to:

- **Transport evidence bases in plan making and decision taking (2015)**¹⁶⁹ provides guidance to help local authorities assess and reflect transport needs in Local Plan making.
- **Travel Plans, Transport Assessments and Statements (2014)**¹⁷⁰ provides advice on when Transport Assessments and Transport Statements are required, and what they should contain.

B.174 Future of Transport: Supporting Rural Transport Innovation (2023)¹⁷¹ shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday rural life and provides guiding principles for the introduction of new technologies and services.

B.175 The Cycling and Walking Investment Strategy Report to Parliament (2022)¹⁷² sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government’s long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England’s roads.

B.176 Decarbonising Transport: A Better, Greener Britain (2021)¹⁷³ sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The document commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2030. The document also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.177 The Environment Act 2021¹⁷⁴ sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

B.178 Decarbonising Transport: Setting the Challenge (2020)¹⁷⁵ sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies¹⁷⁶ to reduce greenhouse gas emissions in individual transport modes, transport as a

¹⁶⁹ MHCLG (2015). Transport evidence bases in plan making and decision taking. (see <https://www.gov.uk/guidance/transport-evidence-bases-in-plan-making-and-decision-taking>)

¹⁷⁰ MHCLG (2014). Travel Plans, Transport Assessments and Statements. (see <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>)

¹⁷¹ Department for Transport (2023). Future of Transport: Helping local authorities to unlock the benefits of technology & innovation in rural transport. (see <https://assets.publishing.service.gov.uk/media/652e37b46b6fb0014b757a9/dft-future-transport-supporting-rural-transport-innovation.pdf>)

¹⁷² Secretary for Transport (2022). Cycling and Walking Investment Strategy Report to Parliament 2022. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1087944/Cycling-and-walking-investment-strategy-report-to-Parliament-2022-web.pdf)

¹⁷³ Department for Transport (2021). Decarbonising Transport: A Better, Greener Britain. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)

¹⁷⁴ HM Government (2021). Environment Act 2021. (see <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>)

¹⁷⁵ Department for Transport (2020). Decarbonising Transport: Setting the Challenge. (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)

¹⁷⁶ These have not been summarised, since the upcoming TDP will supersede them to some extent: the Road to Zero strategy, Maritime 2050 and the Clean Maritime Plan, the Aviation 2050 Green Paper and forthcoming net zero aviation consultation and Aviation Strategy, the Cycling and Walking Investment Strategy, Future of Mobility: Urban Strategy, the 2018 amendments to the Renewable Transport

whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.179 The Road to Zero (2018)¹⁷⁷ sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emissions by 2040.

B.180 Transport Investment Strategy (2017)¹⁷⁸ sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.181 The Highways England Sustainable Development Strategy and Action Plan (2017)¹⁷⁹ is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.182 Door to Door: A Strategy for Improving Sustainable Transport Integration (2013)¹⁸⁰ focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options:
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

B.183 The Strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Sub-national

B.184 The London Plan (2021)¹⁸¹ recognises the value of sustainable modes of transport. The Plan states that the provision of a robust and resilient public transport network is essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way. Sustainable transport is promoted through a variety of policy, including prioritising Healthy Streets and active

Fuel Obligation, Freight Carbon Review, the Rail Industry Decarbonisation Taskforce and the Carbon Offsetting for Transport Call for Evidence.

¹⁷⁷ HM Government (2018). The Road to Zero. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

¹⁷⁸ Department for Transport (2017). Transport Investment Strategy. (see

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918490/Transport_investment_strategy.pdf)

¹⁷⁹ Highways England (2017). Highways England Sustainable Development Strategy and Action Plan. (see

<https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy>)

¹⁸⁰ Department for Transport (2013). Door to Door: A strategy for improving sustainable transport integration. (see

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

¹⁸¹ GLA (2021). The London Plan. (see <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-table-contents>)

travel, the implementation of ULEZ, low emission travel and pedestrianised areas, and enhancing the city's public transport network through a series of initiatives, including improvements to bus networks, overground and underground rail upgrades, and tram upgrades.

B.185 Sustainable Transport, Walking and Cycling guidance (2022)¹⁸² helps support planning authorities and applicants in meeting the requirements of London Plan Policy T3: Transport capacity, connectivity and safeguarding, as well as also supporting delivery against other policies including T1: Strategic approach to transport, and T2: Healthy Streets. It provides guidance to explain how Development Plans and development proposals should support walking, cycling and public transport.

B.186 The London Environment Strategy (2018)¹⁸³ seeks to address environmental challenges and promote sustainability in London. The strategy focuses on key areas including air quality, green spaces, waste reduction, energy efficiency, and transportation. It sets ambitious goals for improving air quality, increasing green cover, reducing waste, and transitioning to a low-carbon economy.

¹⁸² GLA (2022) Sustainable Transport, Walking and Cycling guidance (see <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/sustainable-transport-walking-and-cycling-guidance>)

¹⁸³ GLA (2018) London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

Appendix C

Baseline information

C.1 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.’

‘(3) The environmental characteristics of areas likely to be significantly affected.”

C.2 Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA/SEA with HIA, EqIA and CSIA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about accommodation, social inclusiveness, transport, energy, waste, and economic growth.

C.3 Information on existing environmental, social, and economic conditions in the Plan area provides the baseline against which the Plan’s effects can be assessed in the IIA and monitored during the Plan’s implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Traveller Local Plan to understand the likely future sustainability conditions in the absence of the Traveller Local Plan. This, in turn, can inform a cumulative effects assessment.

C.4 An IIA has been undertaken of Enfield’s emerging Local Plan and so the IIA of the Traveller Local Plan will draw on and provide an update to the baseline information for the borough presented in the May 2020 IIA Scoping Report produced by AECOM and the June 2021 IIA produced by LUC, with specific reference to Travellers where relevant.

Air quality

C.5 Air pollution is the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. In London, the key driver of air pollution is transport. As such, the London Environment Strategy, published in 2018, aims to transform London’s air quality from “illegally poor” to “the best air quality of any major world city” by 2050¹⁸⁴.

C.6 Borough-wide carbon emissions increased by 2% over the 2017 Climate Action Plan baseline year and 6% over 2018. However, in accordance with national and global targets, the Council has already met its carbon emission reduction target of 40% by 2020, as reductions of 45% were made between 2009 and 2018¹⁸⁵.

¹⁸⁴ Mayor of London (2018). London Environment Strategy. (see https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

¹⁸⁵ Enfield Council (2024). Authority Monitoring Report 2023/2024 (see <https://www.enfield.gov.uk/services/planning/monitoring>)

C.7 The entirety of the London Borough of Enfield has been subject to an Air Quality Management Area since 2001, owing to high levels of nitrogen dioxide and PM₁₀ exceeding the standards set by the London Air Quality Management Plan, in the borough's busy roadside locations¹⁸⁶.

C.8 There are four monitoring sites for air pollution across the borough. The measured annual concentrations at the monitoring sites are below the health-based air quality limit value for nitrogen dioxide, which is set at 40ug/m³. As shown in **Table C.1**, NO₂ has decreased in the period 2021-2024 across the four monitoring sites, with a slight increase 2021-2022 at Bush Hill Park and Derby Road monitoring stations. However, this data is likely to have been impacted by the lockdowns in 2021 and 2022¹⁸⁷.

Table C.1 Nitrogen Dioxide in the borough¹⁸⁸

Site name	2021 (ug/m3)	2022 (ug/m3)	2023 (ug/m3)	2024 (ug/m3)
Bush Hill Park	18	19	17	15
Derby Road	24	26	26	23
Bowes Primary School	30	28	24	22
Prince of Wales School	18	18	15	14

C.9 There is currently a total of 241 public electric vehicle charging devices in Enfield, which is 79.2 devices per 100,000 people¹⁸⁹ (as of April 2025). The Council is committed to providing an additional 1,000 charging sockets for electric vehicles on public highways and public car parks by 2026¹⁹⁰.

C.10 There is growing concern from local stakeholders about the impact of air pollution on the Epping Forest Special Area of Conservation (SAC) from traffic movements along the A406. With key development sites such as Meridian water within LBE's boundary, the borough must carefully consider the impacts any development brings with regards to increased traffic on road infrastructure and the knock-on effect this may have on the SAC.

Likely future changes without the Traveller Local Plan

C.11 The entire borough is designated an Air Quality Management Area and although there have been some decreases in nitrogen dioxide levels, these statistics were impacted by the COVID-19 lockdowns in 2021 and 2022. As people travel into work more, there is likely to be an increase in nitrogen dioxide and other pollutants associated with transport. However, this may in part be mitigated by expansion of the Ultra Low Emission Zone, the commitment to ban the sale of petrol and diesel cars by 2035 and the subsequent increase in electric vehicles, in addition to an increased uptake in walking and cycling. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. Regardless of the Traveller Local Plan, air quality is likely to continue to decline as a result of population growth and car dependency but possibly more slowly than historic trends suggest, as a result of the factors listed above. Without the Traveller Local Plan, sites for Travellers may be located in inaccessible locations which increases reliance on private vehicles, particularly if there is a lack of access to public transport, and walking and cycling routes. This would contribute towards poor air quality.

¹⁸⁶ Enfield Council (2025). Enfield Council Air Quality Status Report for 2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0010/101107/Air-quality-annual-status-report-2025-Environment.pdf)

¹⁸⁷ Enfield Council (2024). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

¹⁸⁸ Defra (2025) Data Selector. (see <https://uk-air.defra.gov.uk/data/datawarehouse>)

¹⁸⁹ DfT (2025) Electric vehicle charging devices by local authority. (see: <https://maps.dft.gov.uk/ev-charging-map/index.html>)

¹⁹⁰ Enfield Council (undated) Electric Vehicle Charging. (see: <https://www.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging>)

Biodiversity and geodiversity

C.12 The Enfield Biodiversity Action Plan¹⁹¹ records the borough as having an approximate green coverage of 38%, with 25 designated Sites of Importance for Nature Conservation (SINCS) across the borough. Despite this, the Mayor of London classifies 22% of the borough's population as having a lack of access to nature.

C.13 Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland¹⁹². Although the borough does not contain a SAC, the Epping Forest SAC sits within 0.5km of the borough boundary to the east. The Lee Valley Ramsar site sits 0.5km north of the borough boundary, cradling the border between Essex County Council and Hertfordshire County Council. Lee Valley Regional Park is also designated as a Special Protection Area (SPA).

C.14 The borough contains 41 Sites of Importance for Nature Conservation (SINCs), which are given protection through planning policy. This includes 7 metropolitan sites, 19 borough sites and 15 local sites. According to the latest Authority Monitoring Report, there were no identified losses or changes to the biodiversity status of the 41 SINCs in 2023/24¹⁹³.

C.15 The King George V and William Girling Reservoirs are designated as Sites of Special Scientific Interest (SSSIs) for their nationally important populations of wildfowl and wetland birds¹⁹⁴.

C.16 There are also a number of SSSIs in close proximity to the borough:

- Walthamstow Reservoir SSSI – within 1km;
- Epping Forest SSSI – within 0.5km;
- Cornmill Stream and Old River Lea SSSI – within 1km;
- Waltham Abbey SSSI – within 1km; and
- Northaw Great Wood SSSI – within 2km.

C.17 There are no National Nature Reserves within or within close proximity of the London Borough of Enfield. However, there are pockets of Ancient Woodland in the north east of the borough, in the Enfield Chase area:

- Whitewebbs Wood;
- Little Beachhill Wood;
- Vault Hill Hood;
- Rough Lot & Moat Wood; and
- Oak Wood.

C.18 There have been several network-led nature conservation efforts set out for the borough. The Enfield Chase Woodland Restoration Project is being delivered in partnership with Thames21 and funded by the Mayor of London, Enfield Council and the Forestry Commission. The target of planting 100,000 trees

¹⁹¹ Enfield Council (2011). Nature for People: A Biodiversity Action Plan for Enfield. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0019/5392/planning-application-information-biodiversity-action-plan.pdf)

¹⁹² Enfield Council (2024). Authority Monitoring Report 2023/24. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

¹⁹³ Enfield Council (2022). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

¹⁹⁴ Enfield Council (2022). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

between November 2020 and March 2022 was achieved, resulting in the creation of 60 hectares of woodland¹⁹⁵.

Likely future changes without the Traveller Local Plan

C.19 The London Borough of Enfield contains a number of designated and non-designated biodiversity assets, which are experiencing recreational use pressures and pollution, in addition to loss and fragmentation exacerbated by climate change. Recreational use pressures are a problem, despite the fact less than one quarter of the borough's population lacks access to nature. Without the Traveller Local Plan, pressures on the natural environment are likely to continue, although the Environment Act 2021 will help address habitat loss and fragmentation through biodiversity net gain. In terms of pollution affecting biodiversity assets, particularly the Epping Forest SAC, this may to an extent be mitigated through expansion of the Ultra Low Emission Zone and a shift from petrol and diesel cars to electric vehicles. Without the Traveller Local Plan, sites for Travellers may be located in sensitive locations and so exacerbate the aforementioned problems.

Climate change adaptation

C.20 Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Enfield across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help people, species and habitats adapt.

C.21 The UK Climate Risk Independent Assessment (CCEA3) identifies likely trends from climate change and sets out 61 specific risks and opportunities to the UK from climate change¹⁹⁶. Some of these risks include:

- The number of incidents of food poisoning, heat stress and heat related deaths may increase in summer.
- Domestic energy use may increase during summer months as refrigeration and air conditioning demand increases.
- Wetter winters and more intense rainfall events throughout the year may result in a higher risk of flooding from rivers.
- More intense rainstorms may in some locations result in the amount of surface water runoff exceeding the capacity of drainage systems, consequently leading to more frequent and severe localised flash flooding.
- More frequent storms and floods may cause increased damage to property and infrastructure, resulting in significant economic costs.
- Periods of drought in summer could lead to soil shrinking and subsidence, causing damage to buildings and transport networks. Drought may also impact negatively on agriculture, industry and biodiversity.
- Warmer and drier summers are likely to affect the quantity and quality of water supply, which will need careful management.
- The changing climate will impact on the behaviour and distribution of species and may encourage the spread of invasive species.

¹⁹⁵ Enfield Council (2024). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

¹⁹⁶ UK Climate Risk (2021) Third UK Climate Risk Independent Assessment. (see <https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf>)

C.22 Across England, average annual land temperature in the decade 2010-2019 was 0.9°C warmer than in the period of mid 1970s to mid-2010s, up to 9.5°C from 8.6°C. Based on the Central England Temperature record, the 21st century has so far been warmer overall than any of the previous three centuries, reinforcing the attribution of UK warming to increasing greenhouse gases. Most notable is the greater incidence of hot summer maximum temperatures in England¹⁹⁷. Each of the last three decades in the UK have been hotter than the previous one and the seven warmest years on record have occurred between 2015 and 2021.

C.23 Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990¹⁹⁸.

C.24 Flooding events are likely to become more frequent and severe as the climate changes, as demonstrated in a four month period between 2019 and 2020 when the UK suffered consistent flooding, which cumulated in significant damage caused by Storms Ciara and Dennis. In total, this is estimated to have cost the insurance industry between £435 and £535 million.

C.25 The Intergovernmental Panel on Climate Change's special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO₂ emissions in less than 15 years.¹⁹⁹ It has since been suggested in the Environmental Improvement Plan published in January 2023 that "*whilst we aim to limit global warming to 1.5°C, evidence shows that we must be prepared for warming up to 4°C*", emphasising the importance of climate change adaptation measures and recognition in local policy²⁰⁰.

C.26 The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, while average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers²⁰¹.

C.27 The borough will become more vulnerable to fluvial flooding, water supply deficiencies and sea level rises, as the local climate continues to change. The most significant sources of flooding in Enfield are main rivers and surface water²⁰².

C.28 There are three main river valleys that flow across Enfield towards the River Lee on the eastern side of the borough – Turkey Brook, Salmons Brook and Pymmes Brook. These rivers all rise in or near the higher ground in the western half of Enfield. The majority of the runoff that contributes to these rivers is generated within Enfield. The River Lee is the main source of potential flooding from outside the borough²⁰³.

C.29 The number of properties at risk of flooding in Enfield is high compared to most other local authorities. This is mainly due to the geography and layout of Enfield – most of the properties at risk of flooding are in the Lee valley area, which was historically an area of marshland. Consequently, a wide range of flood defence systems are required to manage flooding and ensure that Enfield's residents and businesses are not faced with unacceptable risks or disruption. These defences include all aspects of the drainage network from simple road gullies to large channelised rivers, floodwalls and flood storage areas²⁰⁴.

¹⁹⁷ UK Climate Risk (2021) Summary for England (CCRA3-IA) (see <https://www.ukclimaterisk.org/publications/summary-for-england-ccra3-ia/#section-1-about-this-document>)

¹⁹⁸ International Journal of Climatology (2022). State of the UK Climate 2021. (see <https://rmets.onlinelibrary.wiley.com/doi/10.1002/JOC.7787>)

¹⁹⁹ IPCC (2019) IPCC Special Report Global Warming of 1.5oC. (see <https://www.ipcc.ch/sr15/>)

²⁰⁰ Defra (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

²⁰¹ Met Office (undated) Climate change in the UK (see <https://weather.metoffice.gov.uk/climate-change/climate-change-in-the-uk>)

²⁰² Enfield Council (2016). Local Flood Risk Management Strategy (see https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

²⁰³ Enfield Council (2016). Local Flood Risk Management Strategy (see https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

²⁰⁴ Enfield Council (2016). Local Flood Risk Management Strategy (see https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf)

C.30 In 2018, Enfield Council developed a Sustainable Drainage Design and Evaluation Guide²⁰⁵ to make sure new developments comply with borough policies. Sustainable Drainage Systems (SuDS) play an important role in increasing the resilience of the drainage network and improving water quality of receiving watercourses. There is a wide range of existing SuDS techniques in operation across Enfield. Some of these are relatively old features such as highway drainage ditches and ponds, more recently rain gardens and permeable paving have been installed as part of highway works and other projects. The guide promotes the idea of integrating SuDS into development to address issues with conventional drainage²⁰⁶. In addition to SuDS, Natural Flood Management techniques such as holding water upstream can provide alternative methods of preparing for climate change and flood risk, as well as delivering co-benefits, and should be considered where appropriate.

Likely future changes without the Traveller Local Plan

C.31 The effects of climate change in the borough are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Climate change is likely to have ongoing effects regardless of the Traveller Local Plan, considering the scale of the challenge it poses. However, the Sustainable Drainage Design and Evaluation Guide will help promote flood risk mitigation.

Climate change mitigation

C.32 Carbon dioxide (CO₂) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO₂ emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

C.33 The Government regularly publishes local authority and regional carbon dioxide emissions statistics²⁰⁷. The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In Enfield, carbon dioxide emissions have fallen from 5.4 tonnes (t) per capita to 2.7t per capita (equivalent to a 50% reduction) as demonstrated in **Table C.2**.

Table C.2 CO₂ emissions estimates in Enfield 2005-2022²⁰⁸

Year	Total emissions (kt)	Per capita emissions (t)
2005	1,524.3	5.4
2006	1,659.4	5.4
2007	1,648.8	5.8
2008	1,464.9	5.7
2009	1,324.5	4.9
2010	1,417.0	4.4

²⁰⁵ Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

²⁰⁶ Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

²⁰⁷ Department for Energy Security and Net Zero (2024). 2005 to 2022 UK local and regional CO₂ emissions – data tables. (see: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022>)

²⁰⁸ Department for Energy Security and Net Zero (2024). 2005 to 2022 UK local and regional CO₂ emissions – data tables. (see: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022>)

Year	Total emissions (kt)	Per capita emissions (t)
2011	1,278.1	4.6
2012	1,357.9	4.1
2013	1,344.1	4.3
2014	1,199.7	4.2
2015	1,145.2	3.7
2016	1,088.1	3.5
2017	1,042.6	3.3
2018	1,036.1	3.2
2019	999.0	3.0
2020	912.8	2.8
2021	936.5	2.8
2022	868.5	2.7

C.34 The Department for Business, Energy & Industrial Strategy produced the following consumption figures for Enfield in 2022²⁰⁹.

- **Coal** – a total of 1.1 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured Fuels** – a total of 0.3ktoe through both industrial and domestic use;
- **Petroleum** – a total of 150.5ktoe predominantly through road transport;
- **Gas** – a total of 166.0ktoe predominantly through domestic use;
- **Electricity** – a total of 80.4ktoe predominantly through non-domestic (industrial, commercial and other) use; and
- **Bioenergy and wastes** – a total of 11.6ktoe predominantly through road transport.

C.35 Between 2005 and 2022, the total reported energy consumption for the borough fell by 18% from 499.5 to 409.8ktoe. The changes in consumption by energy type are shown in **Table C.3**.

Table C.3 Energy consumption in Enfield by type 2005-2022²¹⁰

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)
Coal	1.8	1.1
Manufactured fuels	0.2	0.3
Petroleum	161.8	150.5
Gas	236.7	166.0

²⁰⁹ Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2024). Total final energy consumption at regional and local authority level: 2005 to 2022 (<https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2022>)

²¹⁰ Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2024). Total final energy consumption at regional and local authority level: 2005 to 2022 (<https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2022>)

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)
Electricity	98.4	80.4
Bioenergy and wastes	0.6	11.6
Total	499.5	409.9

C.36 The use of private vehicles can also generate CO₂ emissions, although just under one third of Enfield residents do not own a vehicle, which is significantly below the London average (see 'Transport' section).

C.37 Enfield Council declared a climate change emergency in summer 2019. Their Climate Action Plan 2024²¹¹, overseen by a dedicated Climate Change Taskforce subsequently explains how the borough will become a carbon neutral organisation by 2030, and a carbon neutral borough by 2040. It sets out Enfield's current carbon emissions and the action they will need to take to achieve their net zero targets. The Council has committed to reviewing this Action Plan on an annual basis²¹².

C.38 The Tyndall Centre has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Enfield²¹³.

- Stay within a maximum cumulative carbon dioxide emissions budget of 7.1 million tonnes (MtCO₂) for the period of 2020 to 2100. At 2017 CO₂ emission levels, Enfield would use this entire budget within seven years from 2020.
- Initiate an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -13.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO₂ reduction pathway that stays within the recommended maximum carbon budget of 7.1 MtCO₂. At 2042, 5% of the budget remains. This represents very low levels of residual CO₂ emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO₂ emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO₂ emissions are also adopted.

Likely future changes without the Traveller Local Plan

C.39 Despite efforts to reduce greenhouse gas emissions, the effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. Climate change will therefore continue to prevail. Without the Traveller Local Plan, sites for Travellers may be located in inaccessible locations that increase reliance on private vehicles, although expansion of the Ultra Low Emission Zone and the shift to electric vehicles may help reduce emissions associated with private vehicles.

Communities

C.40 Mid-year population data for 2021 estimates Enfield's population as 329,876, a decrease from 2019 levels which stood at approximately 335,151. Comparatively, the population for London and England have both increased on 2019 levels, standing at an estimated 8,804,769 and 65,078,924 respectively²¹⁴. Despite this, the population of Enfield has increased over the course of the last ten years. The population of Enfield is

²¹¹ Enfield Council (2024) Enfield Climate Action Plan 2024 (see: https://www.enfield.gov.uk/_data/assets/pdf_file/0036/58959/climate-action-plan-2024-environment.pdf)

²¹² Enfield Council (undated). Climate Action (see <https://www.enfield.gov.uk/services/environment/climate-action>)

²¹³ Tyndall Centre (2025). Setting Climate Commitments for Enfield (see <https://carbonbudget.manchester.ac.uk/reports/E09000010/>)

²¹⁴ Nomis (live). Labour Market Profile. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157267/report.aspx?town=Enfield>)

predominantly within the “working age bracket” of 16-64, at an estimated 77.6%. This is lower than the London average and Great Britain averages of 79.6% and 78.5%, respectively.

C.41 Around 0.6% of the population of the London Borough of Enfield identifies as Gypsy or Irish Traveller²¹⁵, compared to the highest percentages in Doncaster (1.5%), Maidstone (1.4%), Leeds (1.4%), Bradford (1.3%) and Swale (1.3%). The number of people who identify as Gypsy or Irish Traveller have a younger age profile compared to the England and Wales population. Specifically, 45.7% are aged 25 years or under, compared with 30.4% of the England and Wales population.

C.42 In 2021, 52.1% of Enfield Borough’s population reported as being ‘White’. ‘Black, Black British, Black Welsh, Caribbean or African’ accounted for 18.3% of the population, ‘Asian, Asian British or Asian Welsh’ accounted for 11.5%, and mixed or multiple ethnic groups accounted for 5.9%. 12.1% of the population reported as being from ‘any other ethnic group’. In 2021, 59.6% of people in Enfield were born in the UK²¹⁶.

C.43 Enfield’s population is highly diverse and includes a small but significant number of Gypsy and Traveller communities. Enfield has a long-standing Gypsy, Roma and Traveller population²¹⁷. As shown in **Figure C.1** and **Figure C.2**, according to the 2021 Census, there are 373 people who identify as Gypsies and Travellers, and 1,121 who identify as Roma. This is a three-fold increase on the 121 Gypsy and Travellers reported in the 2011 Census. Currently, there are over 600 families from Gypsy, Roma and Travelling communities in temporary and private rented accommodation in Enfield. In terms of health, 75.7% of Gypsies and Travellers said their health was very good/good. The net health score was 75.6 compared with 78.8 across the general population. This is measure of the proportion saying their health is good/very good minus those saying it is bad/very bad²¹⁸.

²¹⁵ ONS (2023). Gypsy or Irish Traveller populations, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsyoririshtravellerpopulationsenglandandwales/census2021>)

²¹⁶ Office for National Statistics (2021). Census Maps (see <https://www.ons.gov.uk/census/maps/>)

²¹⁷ Enfield Council (undated) Gypsy, Roma and Travellers in Enfield (see <https://www.enfield.gov.uk/services/your-council/grt#our-vision>)

²¹⁸ Enfield Council (2024) Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2024 Update

Figure C.1 Percentage of Enfield's population of ethnic group White: Gypsy or Irish Traveller²¹⁹

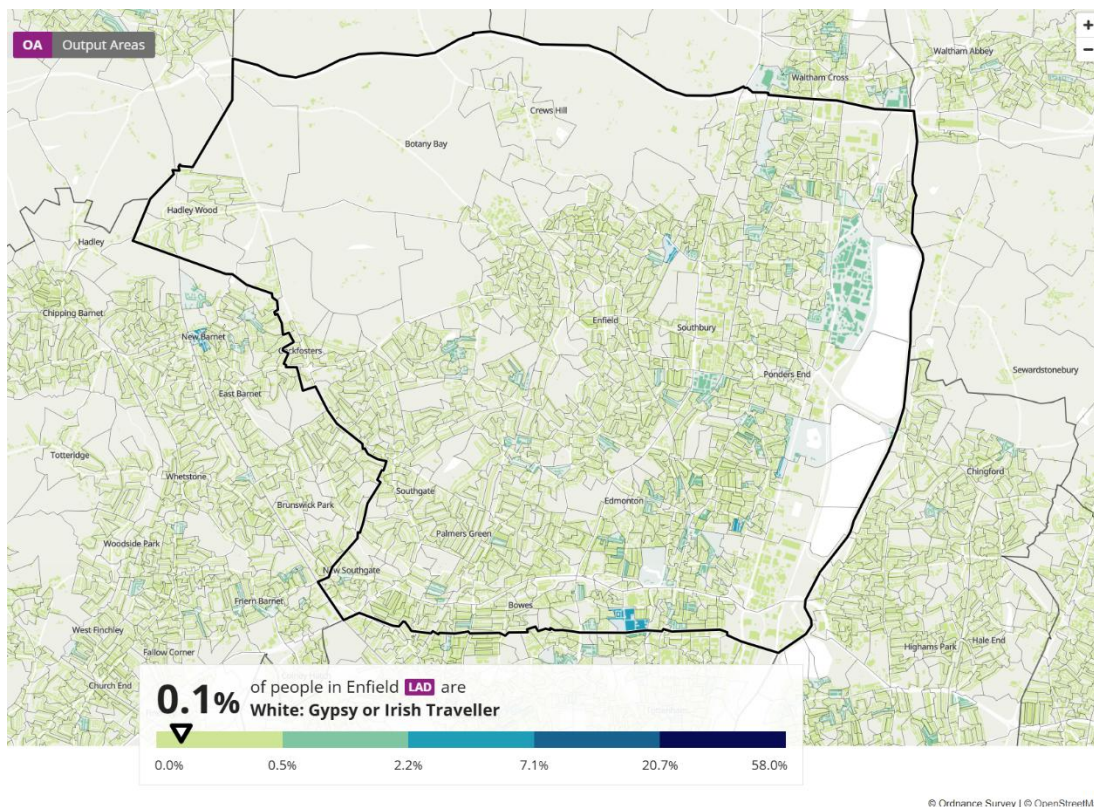
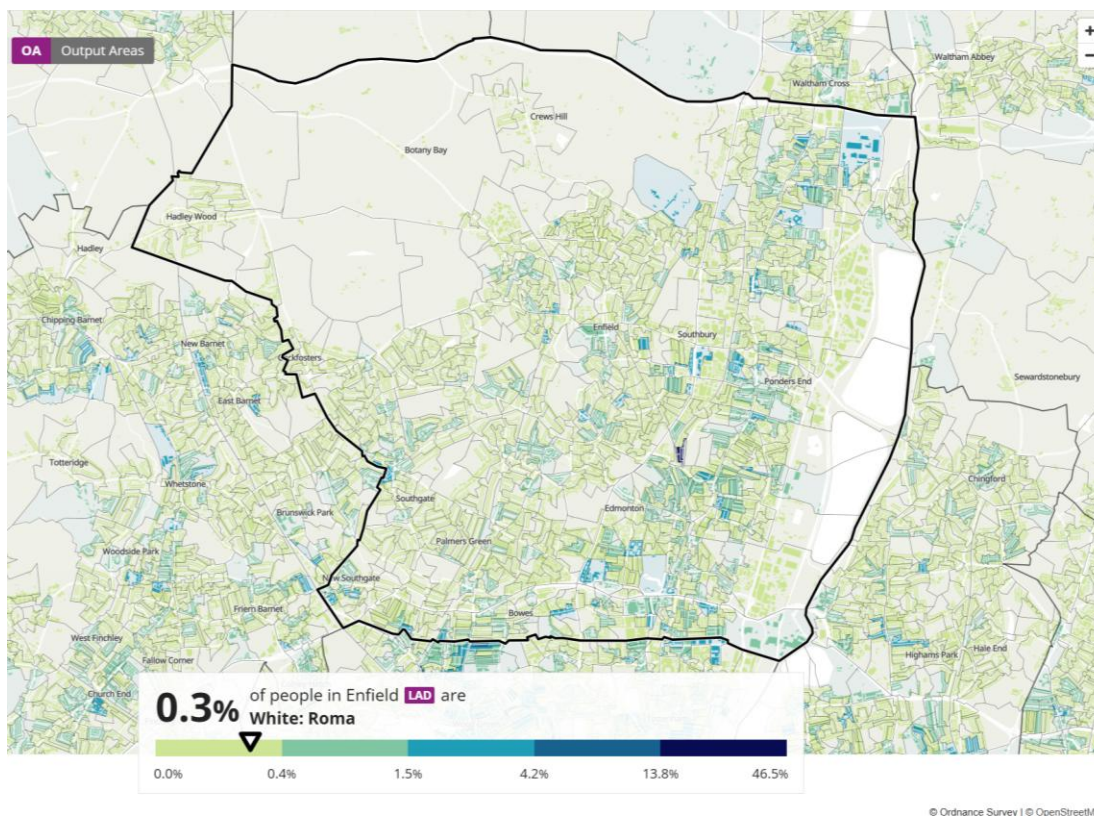


Figure C.2 Percentage of Enfield's population of ethnic group White: Roma²²⁰



C.44 According to the 2021 Census, over 90 languages are spoken as a main or only language by Enfield residents aged three years and over. 76% of people aged three years and over in Enfield speak English as their main or only language. The next most widely spoken main languages are Turkish (5.9%), Romanian (1.8%) and Bulgarian (1.8%). 28% of residents who do not speak English as their main language cannot

speak English well or at all. The Autumn 2023 School Census recorded 92 languages or dialects spoken by at least 10 pupils at Enfield schools. Just over half of pupils in Enfield's state schools have English as a first language²²¹.

C.45 Enfield is ranked as the 59th most deprived local authority area in England and the 12th most deprived in London according to the 2019 English Index of Multiple Deprivation²²². The 10% most deprived areas in Enfield are the most diverse areas with the largest population of ethnic minorities²²³.

C.46 In 2023, the percentage of children reaching the expected standard of reading, writing and maths at Key Stage 2 is highest for pupils from a Chinese ethnic background (82.6%), and lowest for pupils from a Gypsy, Roma and Traveller ethnic background (25%). It is noted, however, that both of these cohorts are very small with only 23 Chinese children and 16 children who declared that they were of Gypsy, Roma and Traveller ethnic background. For all pupils in the London Borough of Enfield, this score was 62.5%²²⁴.

C.47 When looking at average attainment 8 scores, the lowest score in 2023 was for students from Gypsy, Roma and Traveller ethnic background (21.3) and the highest score on average was for students from a Chinese ethnic background (68.3). The Gypsy, Roma and Traveller group was only 6 pupils and the Chinese group was 18 pupils, in Year 11 in 2022/23. For all pupils in Enfield, the attainment 8 score was 47²²⁵.

C.48 In August 2023, the Education Policy Institute published research examining post-pandemic absences in England²²⁶. The report states that the subgroups who have fared the worst in the wake of the pandemic are those from vulnerable and marginalised groups such as disadvantaged pupils, children with special educational needs and Gypsy, Roma and Traveller pupils. These patterns appear to be widening underlying inequalities for vulnerable groups whose education has suffered the most in the wake of the pandemic²²⁷.

Likely future changes without the Traveller Local Plan

C.49 Although the population of Enfield has decreased since 2019, it has gradually been increasing over the past ten years. It is a highly diverse population and there has been a significant increase in Gypsies and Travellers since the 2011 Census. However, Enfield is one of the 20% most deprived local authorities in England. Regardless of the Traveller Local Plan, these trends are likely to continue.

Crime and community safety

C.50 According to official crime summary data published by the Metropolitan Police²²⁸, the number of notifiable offences committed in Enfield between April 2024 and April 2025 was 32,145 – an increase of 3% compared to the previous 12-month period.

C.51 The three most common types of recorded crime in Enfield over this period were 'Violence against the person' (not including sexual offences), 'Theft', and 'Vehicle offences'. The largest percentage increase in crime by type of offence was 'Fraud and forgery', and largest decrease in percentage attributed to burglary.

²¹⁹ ONS (2021) Census maps (see <https://www.ons.gov.uk/census/maps/choropleth/identity/ethnic-group/ethnic-group-tb-20b/white-gypsy-or-irish-traveller/?lad=E09000010>)

²²⁰ ONS (2021) Census maps (see <https://www.ons.gov.uk/census/maps/choropleth/identity/ethnic-group/ethnic-group-tb-20b/white-gypsy-or-irish-traveller/?lad=E09000010>)

²²¹ Enfield Council (2024) Annual Equalities Report 2023/24 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0023/60863/Equality-and-diversity-annual-report-2023-to-2024-Your-council.pdf)

²²² GOV (2019). English indices of deprivation: Local authority district summaries. (see <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

²²³ Enfield Council (2022). Equality and Diversity Annual Report 2021/22. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0022/27238/Equality-and-diversity-annual-report-2021-2022-Your-council.pdf)

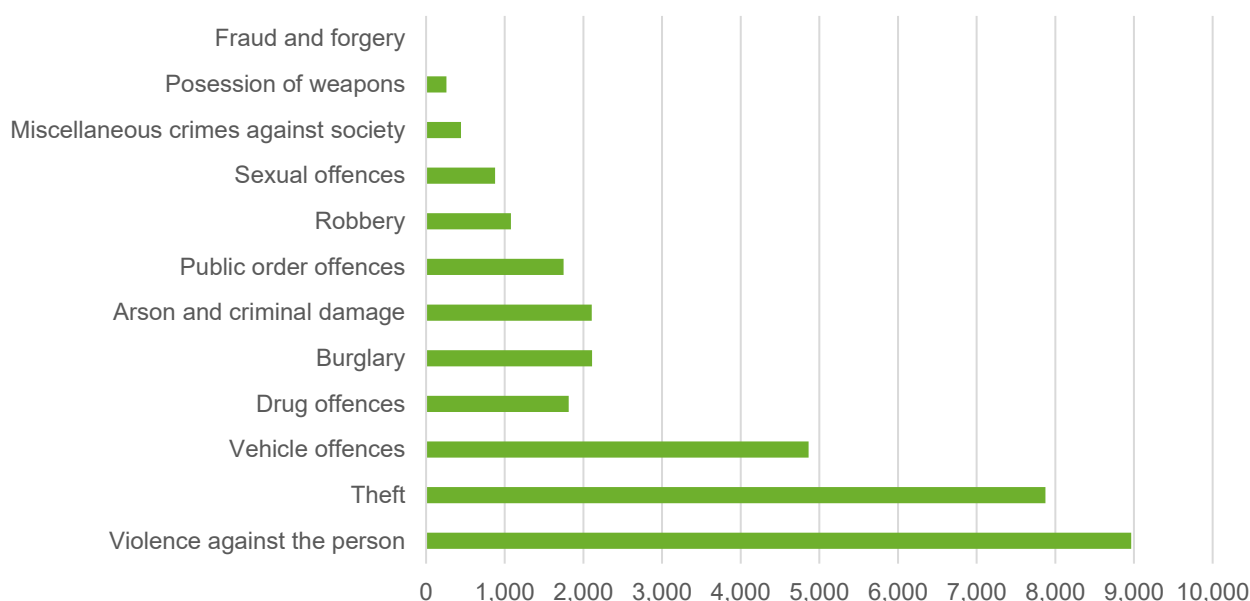
²²⁴ Enfield Council (2024). Annual Equalities Report 2023/24: Investing in Enfield. (see <https://enfield.moderngov.co.uk/documents/s105339/Appendix%201%20Draft%20Annual%20Equalities%20Report%202023%2024.pdf>)

²²⁵ Ibid

²²⁶ Education Policy Institute (2023). Examining post-pandemic absences in England. (see <https://epi.org.uk/publications-and-research/absence/>)

²²⁷ Enfield Council (2024). Annual Equalities Report 2023/24: Investing in Enfield. (see <https://enfield.moderngov.co.uk/documents/s105339/Appendix%201%20Draft%20Annual%20Equalities%20Report%202023%2024.pdf>)

²²⁸ Metropolitan Police (2025). Overview of Crimes: Enfield. (see <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

Figure C.3 Volume of offences by type in April 2024-April 2025²²⁹

C.52 Data made available through the Enfield Borough Profile 2022 shows that 11,861 cases of antisocial behaviour were recorded in Enfield in 2021, 30% lower than 2020 levels.

C.53 Enfield has relatively high proportions of children and young people in comparison to the UK. When considering the rate of serious youth violence per 1,000 population aged 1-19, the London Borough of Enfield recorded a rate of six victims over 2019/2020 the same rate as boroughs with smaller populations such as Haringey, Islington, Hammersmith & Fulham, and Kensington & Chelsea²³⁰.

C.54 In the year ending February 2020, knife crime in Enfield had increased by 27.5%, compared to the previous year. Offences had increased to 789 by the end of February 2020 from 619 in the previous year. London experienced a much smaller increase of 5.7% in the same period. Enfield is ranked 8th in London for knife crime victims under 24 years old²³¹.

C.55 The number of killed and seriously injured casualties on Enfield's roads in 2023 was 87 per billion vehicle miles, higher than the England value of 91.9, and the number of children killed and seriously injured in 2020-2022 was 7.8 per 100,000, lower than the England value of 16.5²³².

C.56 During the pandemic, traffic levels dropped significantly and therefore so did the number of people being killed and seriously injured on London's roads in 2020 and 2021. However, 2022 had seen a reversion to more typical numbers and patterns of injury as travel has recovered following coronavirus restrictions.

C.57 The overall pattern of casualties is similar to pre-Covid, with 80% of people killed or seriously injured being pedestrians, cyclists or motorcyclists. Cars were the vehicle most frequently involved in these collisions.

C.58 In 2023, there were 95 people killed on London's roads, which is 41 fewer people than during the 2010-14 baseline, a 30% decrease, to the lowest number on record outside of the pandemic-affected year of 2021. Within this, there have been decreases in the number of people killed across almost all modes against the 2010-14 baseline. Most significantly there has been a 40% reduction in the number of cyclists killed on

²²⁹ Metropolitan Police (2025). Overview of Crimes: Enfield. (see

<https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

²³⁰ Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17th March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

²³¹ Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17th March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

²³² OHID (live) Public health profiles (see

<https://fingertips.phe.org.uk/search/killed%20or%20seriously%20injured#page/1/gid/1/pat/15/ati/502/are/E09000010/iid/22401/age/27/s/ex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>)

London's roads in 2023 against the baseline (from 13 to 8). Compared to 2022, 7% fewer people were killed on London's roads (from 102 to 95), largely driven by a reduction in the number of car occupants killed, which was abnormally high in 2022 (25 in 2022, compared to an average of 16 between 2017-19). In 2023 there were no reportable deaths of bus/coach occupants, goods vehicle occupants, private hire vehicle occupants or 'Other vehicle' occupants. However, 20% more pedestrians were killed (up from 41 in 2022 to 49)²³³.

C.59 Enfield Council has reported issues with unauthorised encampment activity across the borough. Between October 2019 and August 2020, there were 10 recorded unauthorised encampment activities in Enfield²³⁴. The London Gypsies and Travellers group has challenged local authority injunctions on encampments against the Gypsy and Traveller community. In an appeal by Bromley Council in early 2020 against the High Courts decision to refuse the Council application for an injunction against 'persons unknown' stopping on public land, the Court of Appeal dismissed the case²³⁵. This had implications for boroughs across London in the action they were then able to take against encampment activity. Following this decision, in 2020 Enfield Council withdrew its application to extend its injunction order to 'persons unknown' and was refused an application for an interim injunction as a result of not serving legal documents appropriately²³⁶.

C.60 Recently there has been increased illegal occupation at the Meridian Water site/s and Mollison Avenue where vacant sites have been occupied by organised criminal gangs with Traveller links that have increased tensions with the workforce employed on the large infrastructure projects at the location, this has also meant the LB Enfield has had to cover the cost to clear the site of over 200 tons of illegally dumped waste materials at a cost of over £250K and potentially increase security at the location/s.

Likely future changes without the Traveller Local Plan

C.61 The number of notifiable offences committed in Enfield has seen a near negligible decrease and although there has been a decrease in burglaries, there has been an increase in theft. The Traveller Local Plan is unlikely to directly affect levels of crime unless relating to unauthorised encampment activity, and so it is very difficult to anticipate future trends. Without the Traveller Local Plan, there may be an increase in unauthorised developments and encampments due to the lack of allocated sites available for Travellers, and so could lead to tensions between Traveller and settled communities.

Economy and employment

C.62 For the period January to December 2024, 78.5% of Enfield's population were recorded as being economically active, 1.1% lower than the London average and 0.1% lower than the average across the UK²³⁷. 44.2% of Enfield's population held qualifications of RQF4 and above in the period between January and December 2024. 7.5% of the borough's population held no qualifications during the same period, which is higher than the London average (5.6%) and higher than the national average (6.7%).

C.63 In the 2021 Census²³⁸, elementary occupations and skilled trades were the most common job types held by employed people who identified as Gypsy or Irish Traveller, at 24.6% and 18.2%, respectively. It is important to note that unemployment amongst Gypsy and Traveller communities in the UK is significantly higher than UK averages. Data from the 2021 Census shows that 53% of people aged between 16 and 53

²³³ Transport for London (2025) Casualties in Greater London during 2023 (see <https://content.tfl.gov.uk/casualties-in-greater-london-2023.pdf>)

²³⁴ London Borough of Enfield GTANA (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf)

²³⁵ England and Wales Court of Appeal (Civil Division) Decisions (2020). (see <https://www.bailii.org/ew/cases/EWCA/Civ/2020/12.html>)

²³⁶ London Gypsies and Travellers (2020) A possible end to wide injunctions? (see <http://www.londongypsiesandtravellers.org.uk/news/2020/10/23/a-possible-end-to-wide-injunctions/>)

²³⁷ Nomis (2024). Labour Supply, Enfield. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157267/report.aspx?town=Enfield#tabeinact>)

²³⁸ ONS (2023). Gypsy or Irish Traveller populations, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsvoririshtravellerpopulationsenglandandwales/census2021>)

who identified as White: Gypsy or Irish Traveller were economically inactive²³⁹. Further to this, there is an employment gap between the sexes, particularly for those aged 30 to 34 years where 34.8% of females were employed compared with 58.0% of males. While localised statistics are unavailable, it is unlikely for Enfield to stray from this trend.

C.64 There are a number of barriers that underpin financial and economic exclusion for Gypsy and Traveller communities. Opportunities for these communities to continue traditional forms of employment and self-employment have become more difficult as a result of regulations, for example in the trade of scrap metal²⁴⁰. In addition, a lack of formal education or qualifications prevents the opportunities for future employment. The 2021 Census data demonstrates that 57% of Gypsies and Irish Travellers have no qualifications, the worst educational outcome out of all ethnic groups in the country²⁴¹.

Likely future changes without the Traveller Local Plan

C.65 Educational attainment and employment prospects are, to an extent, dependent on the provision of quality teaching and supportive community and family environments. Planning does, however, play a role in locating sites within close proximity of educational establishments and employment opportunities. The proportion of people recorded as being economically active in Enfield is likely to remain roughly where it is now, particularly as the borough has a large young adult population registered as a student. Regardless of the Traveller Local Plan, it is likely that these trends will continue. Sites for Travellers may come forward but in inaccessible locations where there is no easy access to education and employment opportunities. The Traveller Local Plan offers an opportunity to address this.

Health

C.66 For the period 2022/23, 57.8% of adults in Enfield were classified as overweight or obese. This is under the national average of 64%²⁴². While below the national average, current trends suggest that Enfield is at risk of continuous declining physical health within its population. This is further compounded by the prevalence of obesity amongst children in the borough. Of children in Year 6 and upwards (where records begin to be taken) living in Enfield, 27.5% are classified as obese, compared to the national average of only 22.1%. This is a significant increase of 5.4% and suggests that Enfield's population is trending towards more behavioural risk factors, and lower levels of health.

C.67 In 2022, 24,335 adults (aged 17 and over) were recorded as having diabetes in Enfield. According to the Office for Health Improvement and Disparities, this constitutes a prevalence of 8.6% – the seventh highest in London. It is higher than both the London average of 6.9% and the England average of 7.5%²⁴³.

C.68 For the period of 2022/23, 60.2% of adults were recorded as being physically active compared to the national average of 67.1%. Additionally, 14.1% of Enfield's population are active smokers, 2.5% above the national average. Data from 2014/15 provided local level data that showed 3.5% of 15-year olds in Enfield were smokers – lower than London and national averages but an indication that uptake of smoking remains a threat to young people²⁴⁴.

C.69 Life expectancy (at birth) for males between 2021 and 2023 was 80.5 years, and for females between the same years was recorded at 84.7. Perhaps surprisingly, both of these values were above the national

²³⁹ Census 2021. Ethnic differences in health, employment, education and housing shown in England and Wales Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/ethnicgroupdifferencesinhealthemploymenteducationandhousingshowninenglandandwalescensus2021/2023-03-15>)

²⁴⁰ Friends, Families and Travellers (2023). Briefing Economic and Financial exclusion experienced by Gypsies and Travellers in England (see https://www.gypsy-traveller.org/policy-publications/?wpv_post_search=economic&wpv_aux_current_post_id=5448&wpv_view_count=5633)

²⁴¹ Census 2021. Ethnic differences in health, employment, education and housing shown in England and Wales Census 2021.

²⁴² Public Health England (2024). Local Authority Health Profiles: Enfield. (see <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/15/ati/501/are/E09000010/iid/93347/age/187/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>)

²⁴³ Enfield Council (2024). Enfield Borough Profile 2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0018/63009/Borough-profile-2024-Your-council.pdf)

²⁴⁴ Public Health England (2024). Local Authority Health Profiles: Enfield. (see <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/15/ati/501/are/E09000010/iid/93347/age/187/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>)

average at the time, despite the aforementioned health and behavioural risk factors trending above the national average.

C.70 In 2017, Enfield recorded the prevalence of common mental disorders for residents aged 16 and over at 49,261 persons, approximately 19.2% of the borough's population, and 2.3% above the national average²⁴⁵. Additionally, in 2017/18 the estimated number of children and young people with mental disorders (aged 5 to 17) was 7,206 – though this is little sufficient evidence to accurately compare this to national statistics. This includes emotional, conduct, and hyperkinetic disorders.

C.71 There were 1,718 recorded cases of dementia among people aged 65 and over. 5.3% of adults over 65 years of age have been diagnosed with dementia – indicating Enfield has the highest prevalence of recorded cases of dementia in London, and higher than the rate for England. It is higher than both the London average of 6.7% and the England average of 7.1%²⁴⁶.

C.72 Interview respondents to the 2020 London Borough of Enfield Gypsy and Traveller Accommodation Assessment cited physical and mental health as a challenge faced specifically by Gypsy and Traveller households. Long term health issues were also cited as a reason for not travelling²⁴⁷. Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average²⁴⁸.

C.73 According to the 2021 Census, poorer health was reported across all age groups and in both sexes among people who identified as Gypsy or Irish Traveller, compared with the England and Wales population. People who identify as Gypsy or Irish Traveller are almost twice as likely to provide 50 hours or more of unpaid care per week than the England and Wales population (5.2% and 2.7%, respectively), particularly females. Travellers face particular barriers to accessing primary healthcare services. A study of 50 GP practices in England by the Friends, Families and Travellers (2019)²⁴⁹ found that nearly half of all GP practices refused registration to individuals due to no proof of address or identification, despite it not being a regulatory requirement to provide this information.

Likely future changes without the Traveller Local Plan

C.74 The life expectancy of Travellers is significantly lower than the national average and Travellers have cited facing particular issues with physical and mental health. This may in part be due to the fact GP surgeries refuse registration to individuals who have no proof of address or identification, and so Travellers do not receive the medical attention they require. It is likely this trend will continue – particularly as no authorised pitches or sites for Travellers exist within Enfield and so Travellers have no proof of address. Without the Traveller Local Plan, it is possible that sites used by Travellers may be in isolated locations with no easy access to healthcare facilities, in addition to things like open space, walking and cycling which can have beneficial effects on health and wellbeing. The Traveller Local Plan offers an opportunity to address these concerns.

Heritage and townscape

C.75 Enfield has several historic assets designated at local and national scale within its boundaries including five scheduled monuments, the most notable of which is the Earthworks at Old Park (1002047)²⁵⁰, 22 conservation areas; 5 registered parks and gardens; 479 listed buildings; 262 local landmarks and landscapes identified on the Local Heritage List; and 25 areas of archaeological importance.

²⁴⁵ Office for Health Improvement & Disparities (2023). Mental Health and Wellbeing JSNA. (see <https://fingertips.phe.org.uk/profile-group/mental-health/profile/mh-jsna/data#page/1/gid/1938132922/pat/6/ati/402/are/E09000010/iid/93495/age/164/sex/4/cat/-1/ctp/-1/yr/1/cid/4/tbm/1>)

²⁴⁶ Enfield Council (2022). Authority Monitoring Report 2021/2022 (see https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf)

²⁴⁷ London Borough of Enfield GTANA (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf)

²⁴⁸ Equality and Human Rights Commission (2017). Gypsies and Travellers: simple solutions for living together. (see <https://www.equalityhumanrights.com/en/gypsies-and-travellers-simple-solutions-living-together>)

²⁴⁹ Friends, Families and Travellers (2022). Briefing: Health inequalities experienced by Gypsy, Roma and Traveller Communities (see <https://www.gypsy-traveller.org/resource/briefing-health-inequalities-experienced-by-gypsy-roma-and-traveller-communities/>)

²⁵⁰ Historic England (2025). Map Search: Enfield. (see <https://historicengland.org.uk/listing/the-list/map-search>)

C.76 All 22 conservation areas in the borough have Conservation Area Character Appraisals. These documents highlight assets which make the areas distinctive and aim to protect the important historical and cultural features. Historic England defines the purpose of appraisals such as this as *“the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management”*²⁵¹.

C.77 Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2024 HAR register²⁵² records 23 entries that are at risk within the borough. As shown in **Table C.4**, of these, five are Grade II* listed buildings, and five are conservation areas (Church Street, Enfield Town, Fore Street, Montagu Road Cemeteries and Trent Park). Four are registered parks and gardens (Grovelands, Broomfield, Forty Hall and Trent Park) and the remaining HARs are Grade II listed buildings.

Table C.4 Heritage at Risk in Enfield

Designated site name	Heritage category	Condition	Vulnerability	Principal vulnerability	Trend	Priority
Church Street, Edmonton N9	Conservation Area	Poor	Low	-	No significant change	-
Enfield Town	Conservation Area	Poor	High	-	Deteriorating	-
Fore Street, Edmonton N18	Conservation Area	Very bad	High	-	Deteriorating significantly	-
Montagu Road Cemeteries N9	Conservation Area	Very bad	Medium	-	Deteriorating	-
Trent Park, Enfield	Conservation Area	Poor	High	-	Deteriorating	-
All Saints Church, Church Street, Edmonton N9	Listed Building grade II*	Poor	-	-	-	B - Immediate risk of further rapid deterioration or loss of fabric; solution agreed but not yet implemented
Church of St Andrew, Church Walk, Enfield	Listed Building grade II*	Poor	-	-	-	C - Slow decay; no solution agreed

²⁵¹ Historic England (2019). Conservation Area Appraisal, Designation and Management. (see <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>)

²⁵² Historic England (2022). Heritage at Risk Register. (see <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?searchType=HAR&search=Enfield&page=1>)

Designated site name	Heritage category	Condition	Vulnerability	Principal vulnerability	Trend	Priority
Grovelands Park N14	Registered Park and Garden grade II*	Generally satisfactory but with significant localised problems	Medium	-	Declining	-
Broomfield Park N13	Registered Park and Garden grade II	Generally satisfactory but with significant localised problems	Medium	-	Declining	-
Forty Hall	Registered Park and Garden grade II	Generally satisfactory but with significant localised problems	High	-	Declining	-
Trent Park	Registered Park and Garden grade II	Generally satisfactory but with significant localised problems	Medium	-	Improving	-
Broomfield House, Broomfield Park, Broomfield Lane N13	Listed Building grade II*	Very bad	-	-	-	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed
Stable block in Broomfield Park, Broomfield Lane N13	Listed Building grade II*	Very bad	-	-	-	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed
Enfield Electricity Works, 20, Ladysmith	Listed Building grade II	Poor	-	-	-	C - Slow decay; no solution agreed

Designated site name	Heritage category	Condition	Vulnerability	Principal vulnerability	Trend	Priority
Road, Enfield						
Barn at Whitewebbs Farm, Whitewebbs Road	Listed Building grade II	Very bad	-	-	-	B - Immediate risk of further rapid deterioration or loss of fabric; solution agreed but not yet implemented
Trent Park House terrace, Cockfosters Road, Trent Park	Listed Building grade II	Very bad	-	-	-	D - Slow decay; solution agreed but not yet implemented
Former Edmonton Girls' Charity School, Church Street, Edmonton N9	Listed Building grade II	Poor	-	-	-	C - Slow decay; no solution agreed
24, Church Street, Edmonton N9	Listed Building grade II	Poor	-	-	-	C - Slow decay; no solution agreed
North Lodge, Whitewebbs Road	Listed Building grade II	Very bad	-	-	-	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed
Southgate House, High Street N14	Listed Building grade II*	Very bad	-	-	-	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed
Site of Elysinge	Scheduled Monument	Generally satisfacto	-	Scrub/tree growth	Declining	-

Designated site name	Heritage category	Condition	Vulnerability	Principal vulnerability	Trend	Priority
Hall, Forty Hall		ry but with significant localised problems				
Nonconformist Chapel, Lavender Hill Cemetery, Cedar Road	Listed Building grade II	Poor	-	-	-	C – Slow decay; no solution agreed
Holly Hill Farmhouse, The Ridgeway	Listed Building grade II	Very bad	-	-	-	A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed

Likely future changes without the Traveller Local Plan

C.78 The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance. There are many designated and non-designated heritage assets and areas of historical and cultural interest in the borough that could be adversely affected by inappropriate siting of Traveller sites. Without the Traveller Local Plan, unauthorised sites and encampments may be located in areas with particular sensitivities to the historic environment, despite the Local Plan containing policies that seek to protect and enhance the historic environment.

Housing

C.79 In the London Plan²⁵³, Enfield Borough has a 10 year housing target of 12,460 new homes (1,246 each year) and 3,530 new homes on smaller sites. The borough must also achieve 195 units per year for older persons.

C.80 An overall total of 1,041 dwellings were completed (net) for all types of accommodation in the period 2021/22. This figure includes all types of housing such as care home bedrooms and student accommodation, as well as conventional housing. The number of dwellings completed fell short of the GLA's annual housing target for Enfield of 1,246 homes per annum²⁵⁴. According to the 2021 Census²⁵⁵, semi-detached properties were the most common accommodation type for those who identified as Gypsy or Irish Traveller who lived in households (28.3%), followed by caravan or other mobile or temporary structure (21.6%). This compares with 34.0% and 0.3% respectively, for the England and Wales population. In comparison with the England and Wales population, people who identified as Gypsy or Irish Traveller were four times less likely to own

²⁵³ Mayor of London (2021). The London Plan. (see <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>)

²⁵⁴ Enfield Council (2022). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/_data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

²⁵⁵ ONS (2023). Gypsy or Irish Traveller populations, England and Wales: Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/gypsyoririshtravellerpopulationsenglandandwales/census2021>)

their accommodation with a mortgage, loan or shared ownership (9.5% compared with 35.6%) and over twice as likely to live in social rented accommodation (42.3% compared with 16.6%). People who identified as Gypsy or Irish Traveller were over three times more likely to live in overcrowded accommodation than the England and Wales population (26.5% compared with 8.4%).

C.81 Enfield has no pitches or plots for Traveller accommodation with the last residential site in Enfield being closed in 1999. According to the Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) (May 2024)²⁵⁶, there are currently no Gypsy and Traveller pitches in Enfield and following the identification of households who either live in Enfield in bricks and mortar accommodation or have an association with the borough, the GTAA has evidenced a cultural shortfall of 30 pitches over the Plan period to 2041. From existing households wanting to move onto a pitch and newly-forming households, of this need, 16 are needed in the first five years (2020/21 to 2024/25) and 14 over the remaining period to 2040/41. If there are any adjustments to the timeframe for the evidence base, this immediate need should be considered backlog need. Additional need may arise over the Plan period, for instance households moving into Enfield Borough, the GTAA therefore recommends the Council has criteria-based policies to inform future planning applications for private sites should they arise. A nomadic lifestyle is an integral part of Gypsy and Traveller tradition, however a shortage of sites results in Travellers being pushed into housing which is not culturally suitable for many.

C.82 The GTAA recommends that the scale of need is acknowledged and that the Council considers future applications for small sites to meet the needs of additional families who may emerge over the plan period.

Likely future changes without the Traveller Local Plan

C.83 As there are no authorised pitches or sites for Travellers within Enfield, Travellers have been pushed into housing that is not culturally suitable for them or they have alternatively set up unauthorised encampments and sites. It is therefore likely that without the Traveller Local Plan, there will continue to be a shortfall in pitches, resulting in an increase in Travellers being pushed into housing that is not culturally suitable for them and unauthorised encampments.

Landscape and green infrastructure

C.84 The Enfield Blue and Green Strategy 2021-2031 seeks to make Enfield the greenest borough in London by 2031, including through achieving a 25% increase in blue-green infrastructure in Enfield²⁵⁷.

C.85 A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London, with an overall “Green Space Score” of 44.56, just 4.28 off the greenest borough, Richmond upon Thames²⁵⁸. The overall Green Space Score is calculated using the following survey metrics: amount of green space in hectares; percentage of green space in the borough; public perception of green space; air quality; public “happiness”; and public anxiety. While this is a significant improvement on previous data showing Enfield as the 9th greenest borough, there remains some green space accessibility concerns, particularly with reference to the east of the borough and the Lee Valley Regional Park. Connections to these areas are restricted by physical barriers including industrial land and the River Lea²⁵⁹.

C.86 Around 40% of the borough’s area is designated Green Belt and there are several sizeable parks within the built-up area. The largest park is Trent Country Park with 400 acres of meadow, woodland and lakes, plus a water garden, animal corner, café and a full walks and events programme²⁶⁰.

²⁵⁶ Arc (2024). Enfield Borough’s Gypsy and Traveller Accommodation Needs Assessment.

²⁵⁷ Enfield Council (2020). Enfield’s Blue and Green Strategy. (see https://www.enfield.gov.uk/data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf)

²⁵⁸ Essential Living (2020). The Greenest Cities in Europe. (see <https://www.essentialliving.co.uk/blogs-insights/the-greenest-cities-in-europe/>)

²⁵⁹ Enfield Council (2010). The Enfield Plan Core Strategy 2010-2025. (see https://www.enfield.gov.uk/data/assets/pdf_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf)

²⁶⁰ Enfield Council (2024). Authority Monitoring Report 2023/2024. (see https://www.enfield.gov.uk/data/assets/pdf_file/0029/95294/Authority-monitoring-report-and-5-year-housing-land-supply-2023-to-2024-Planning.pdf)

C.87 The quantity of open space (ha per 1,000 population) varies between wards across Enfield. Some wards fall below the recommended open space (quantity) standard. While the quantity of open space / play space is an important factor, quality, value and ease of accessibility of open spaces may have a more significant impact in terms of the recreational offer and benefits afforded to health and wellbeing²⁶¹.

C.88 According to the latest Annual Monitoring Report, there was no net loss of designated Green Belt or Metropolitan Open Land over the monitoring period 2023/24 with the borough's Green Belt extent remaining at 3,058ha²⁶².

C.89 According to the latest Annual Monitoring Report, there was no net loss of Protected Open Space over the monitoring period 2023/24 with the area of Protected Open Space remaining at 579ha²⁶³.

Likely future changes without the Traveller Local Plan

C.90 The borough's landscapes and townscapes are vulnerable to adverse effects from urban expansion and increasing recreational pressures, particularly as around 40% of the borough is Metropolitan Green Belt. Without the Traveller Local Plan, it is possible that Traveller sites may come forwards in areas with high landscape sensitivity.

Transport

C.91 Enfield's road network comprises approximately 68km of principal roads, 37km of the TfL road network, 51km of non-principal classified roads, and 466km of unclassified roads. Only three main roads cross through the borough; the M25 to the north, the A10 (London to Cambridge) running up through the centre of the borough, and the A406 (The North Circular) across the southern edge of the borough.

C.92 The borough has 22 train / tube stations and is serviced by four separate lines. These include:

- The London Underground Piccadilly Line – servicing the west of the borough with four associated stations;
- West Anglia Main line to London – servicing Liverpool Street to Hertford East;
- London Overground – servicing Liverpool Street to Chestnut; and
- Govia Thameslink Railway – servicing Moorgate to Hertford North and Wootton Bassett.

C.93 Between 2017 and 2019 Network Rail delivered the £170 million Lee Valley Rail programme, which increased capacity on the West Anglia mainline. A significant element of this is the delivery of a new four platform train station at Meridian Water to service the new 10,000 home development in the area. The London Borough of Enfield worked with the Mayor of London to submit a forward funding bid to the Government's Housing Infrastructure Fund. The objective of the bid was to deliver a four trains per hour service and road infrastructure to unlock the early delivery of homes at Meridian Water.

C.94 Both Routes 1 and 12 of the National Cycle Network run through the London Borough of Enfield. Route 1 comprises a long distance cycle route connecting Dover to Shetland. It runs through the east of Enfield following the River Lea. Route 12 runs in sections from Enfield Lock to Spalding via Stevenage, St Neots and Peterborough. The section within Enfield is currently incomplete and temporarily starts from Hadley Wood as opposed to Enfield Lock.

C.95 The London Borough of Enfield Transport Plan 2019²⁶⁴ notes that Enfield is one of five Outer London Boroughs identified as having the greatest number of potentially cyclable trips, with nearly 80% of car trips in

²⁶¹ LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

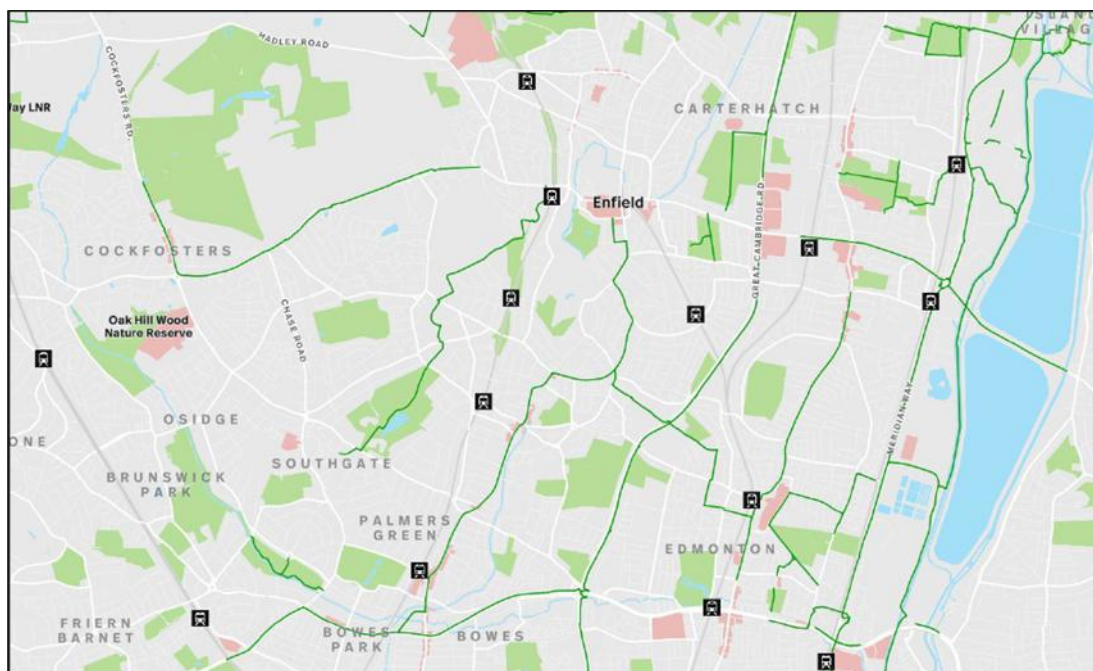
²⁶² LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

²⁶³ LUC (2020). Enfield Blue and Green Infrastructure Audit. (see https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf)

²⁶⁴ Enfield Council (2018). The London Borough of Enfield Transport Plan 2019. (see https://www.enfield.gov.uk/data/assets/pdf_file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf)

Enfield of cyclable length. The below figure demonstrates the borough's established cycle routes, in dark green.

Figure C.4 Established cycle routes within LBE ²⁶⁵



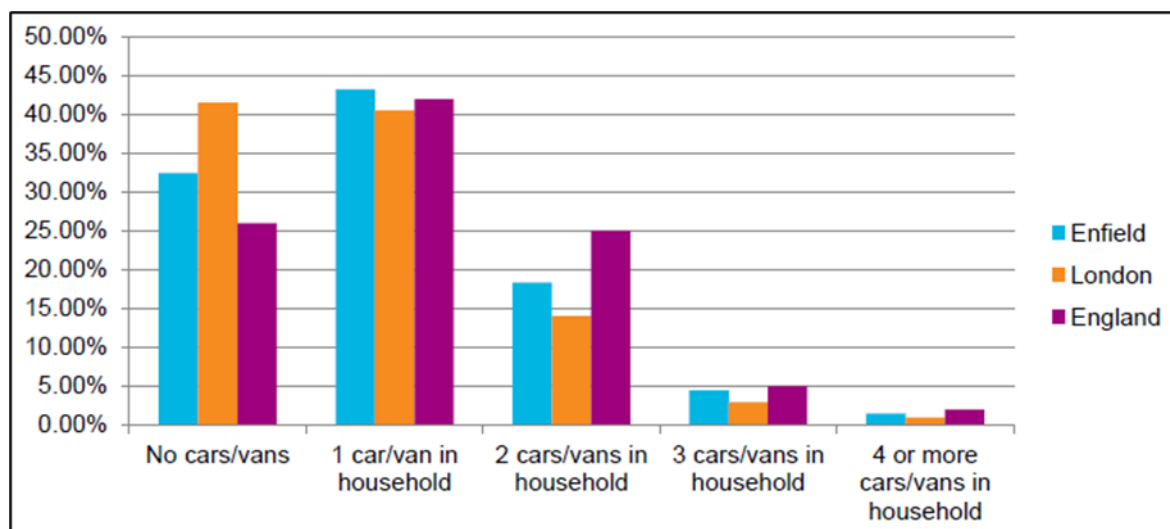
C.96 Enfield is served by a network of 38-day bus routes, seven school-day only services, and eight night bus routes, which altogether service the 547 bus stops within the borough. The North London Sub-Regional Transport Plan report states that travelling by bus accounts for 14% of all journeys made by LBE residents.

C.97 With regard to personal vehicles, the below figure, taken from 2011 ONS Census data, demonstrates that approximately 32% of Enfield residents do not own a car or van. This is notable for being significantly below the London regional level (where circa 42% of people do not own a car or van). Statistics show that 69% of households in outer London have access to or own a car, compared with 42% in inner London and 77% across England as a whole²⁶⁶. This may reflect the level of public transport accessed in the borough. However, given the borough's issues around inequality and deprivation, it is likely this is a result of affordability.

²⁶⁵ Cycle Enfield (2019). (see <https://journeysandplaces.enfield.gov.uk/>)

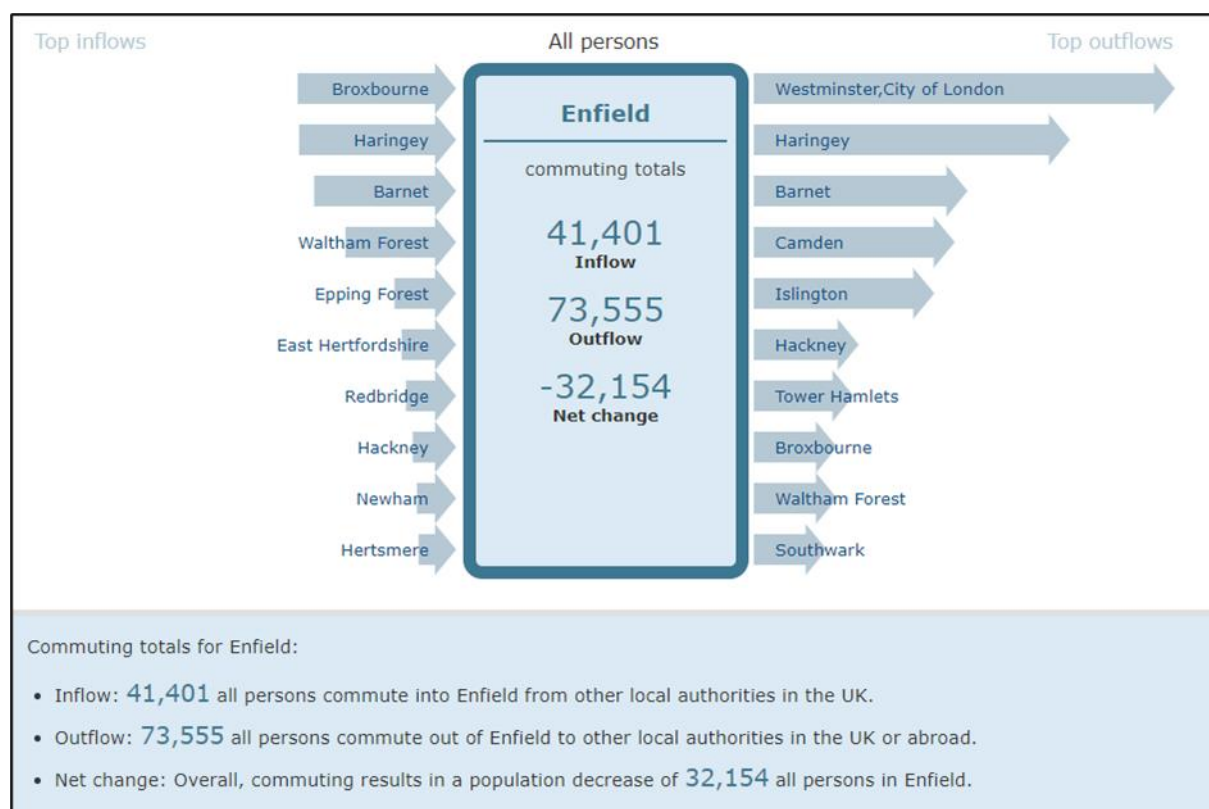
²⁶⁶ Centre for London (2023) Moving with the Times: Supporting sustainable travel in outer London (see <https://centreforlondon.org/reader/sustainable-travel-outer-london/travel-today/#the-factors-influencing-people8217s-travel-choices>)

Figure C.5 Car and Van ownership across Enfield, London, and England



C.98 It is important to note that this data should be viewed in the context of LBE’s location within Greater London. Statistical comparison with England as a whole should be caveated by the understanding that the public transport model in London, as well as the extent, capacity and modal variety of the network is unique in England. In this context it is likely to be more instructive to compare public transport use in LBE to that of Greater London rather than to England as a whole.

C.99 Enfield is subject to greater outflow for employment than inflow, with the largest number of commuters outflowing to Westminster and the City of London (13,690). More people inflow into Enfield from Broxbourne (5,002) than any other borough. As a total, commuting to places of work results in an overall negative flow of people in Enfield of -32,154. This is illustrated below in **Figure C.6**.

Figure C.6 Commuting Totals for Enfield – Inflows and Outflows²⁶⁷

Likely future changes without the Traveller Local Plan

C.100 Commuting trends are likely to continue as they are, although there may be a greater increase in people commuting out of the borough as the UK continues to recover following the COVID-19 pandemic. As described above, in the last few years there has been a lot of investment in public transport, in particular the opening of Meridian Water railway station in 2019. Around one third of residents in Enfield own a vehicle, which is considerably lower than the London average. Regardless of the Traveller Local Plan, use of public transport will continue and maybe increase with further investment. Without the Traveller Local Plan, Traveller sites may be in inaccessible locations with no easy access to public transport, as the location of development within close proximity to existing services and facilities can influence use of public transport, and more active modes.

Water

C.101 The River Lea is the most significant watercourse running through the borough. It is the easternmost tributary to the Thames, joining it at Tower Hamlets. The borough has over 100km of rivers and waterways. The Pymmes Brook, Salmon Brook and Turkey Brook are the main River Lea tributaries that make up LBE's water network. The Water Framework Directive requires all EU watercourses to achieve a 'Good' overall (ecological and chemical) status by 2027. The ecological status of the majority of watercourses in Enfield has stayed the same since 2016, however Lea Navigation (Enfield Lock to Tottenham Locks) has improved from 'bad' to 'poor'²⁶⁸. **Table C.5** below sets out the hydromorphological designation, current overall status and reasons for not achieving 'Good' status for the main watercourses that run through LBE. As per the Environment Agency data, the River Lea has been separated into three different catchments, which all sit within LBE's boundary.

²⁶⁷ Nomis (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>)

²⁶⁸ Environment Agency (2022). Lee Lower Rivers and Lakes. (see <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3275>)

Table C.5 LBE watercourses and regulatory status

Watercourse	Catchment area	Designation	Overall status (2016)	Overall status (2022)	Reasons for not achieving 'Good' status
Lea Navigation (Fieldes Weir to Enfield Lock)	45.48km ²	Heavily modified	Poor	Poor	Urbanisation Surface water abstraction Sewage discharge Misconnection Inland boating and structures Invasive non-native species Use of restricted substance
Lea Navigation (Enfield Lock to Tottenham Locks)	15.811km ²	Heavily modified	Bad	Poor	Urbanisation Transport drainage Sewage discharge Inland boating and structures Misconnections Flood protection structures Invasive non-native species
Small River Lee (and tributaries)	40.034km ²	Not designated artificial or heavily modified	Moderate	Moderate	Urbanisation Sewage discharge Invasive non-native species Misconnection Land drainage
Pymmes Brook	40.778km ²	Heavily modified	Moderate	Moderate	Sewage discharge Urbanisation Transport drainage Misconnections Flood protection structures
Salmon Brook	36.956km ²	Heavily modified	Moderate	Moderate	Urbanisation Transport drainage Trade/Industry discharge Poor soil management

Watercourse	Catchment area	Designation	Overall status (2016)	Overall status (2022)	Reasons for not achieving 'Good' status
					Poor livestock management Flood protection structures Misconnections
Turkey Brook	48.209km ²	No designated artificial or heavily modifies	Poor	Poor	Urbanisation Transport drainage Private sewage treatment and domestic sewage discharge Poor nutrient management

C.102 Thames Water's Water Resources Management Plan (WRMP) notes that the Thames Water supply area is “designated as seriously water stressed” meaning that demand is very high in relation to available supply. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage, while it also notes that approximately 25% of the water put into supply is lost through leakages. The WRMP estimates that by 2035 there will be a shortfall of 376 million litres of water per day for the Thames Water supply area, and that by 2050 and 2075 this will have risen to 1,060 and 1,128 million litres of water per day, respectively²⁶⁹. Thames Water has looked at a wide range of options to plug the shortfall, including reducing the amount of water lost through leaks in pipes, promoting water efficiency and installing smart meters in customers’ homes, as well as options which increase supplies such as sourcing new groundwater, storing more water, reusing treated wastewater from treatment works and transferring water from other areas.

C.103 Regarding wastewater, services for Enfield are provided by Thames Water. The borough is served by the Deephams Sewage Treatment Works, which serves Enfield as well as the neighbouring boroughs of Epping, Waltham Forest and Haringey. This will need significant upgrade in order to continue to service a growing population.

C.104 Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, in accordance with the 2015 Nitrate Pollution Prevention Regulations. Waters are defined as polluted if they contain nitrate concentrations greater than 50mg/l. The entirety of the borough is covered by the Lee NVZS443.

C.105 Part of the borough is a Drinking Water Surface Water Protected Area, which is an area where ‘raw’ water is extracted from rivers or reservoirs. Raw water requires protection to ensure that it is not polluted which could lead to additional purification treatment. As with the majority of the south east of England, LBE is located over a principal aquifer (Chalk), which is protected for drinking water purposes under the Water Framework Directive²⁷⁰.

Likely future changes without the Traveller Local Plan

C.106 The borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include transport drainage and wastewater discharged. Without the Traveller Local Plan, it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards such as the Water

²⁶⁹ Thames Water (2024). Water Resources Management Plan 2024. (see <https://www.thameswater.co.uk/about-us/regulation/water-resources>)

²⁷⁰ British Geological Survey (2020). Principal aquifers in England and Wales. (see <https://www2.bgs.ac.uk/groundwater/shaleGas/aquifersAndShales/maps/aquifers/home.html>)

Framework Directive would help to reduce the potential for this to occur. Regardless of the Traveller Local Plan, it is likely that the Thames Water supply area will continue to be seriously water stressed.

Appendix D

Integrated Impact Assessment findings for the Issues and Options Traveller Local Plan

D.1 This appendix presents the IIA findings of the Issues and Options version of the Traveller Local Plan. These findings were presented in the IIA Scoping Report (also referred to as the 'Scoping and Initial Options Appraisal') dated July 2023, which was consulted on between September and November 2023.

Aims and Objectives

D.2 This section presents the IIA findings of Chapter 3 (Aims and Objectives) of the Issues and Options Traveller Local Plan.

Aims

D.3 The proposed aims of the Issues and Options Traveller Local Plan are:

1. To provide a sufficient mix of, and type of, sustainable and high quality sites, which are distributed evenly across the borough to fully meet the assessed accommodation needs of the Traveller communities.
2. To provide Traveller sites that are located in areas that provide protection from flooding and enable adequate access to public transport, community facilities such as schools, health centres and shops.
3. To reduce the number of unauthorised developments and encampments, and increased integration between the Traveller communities and the settled community.
4. To protect and enhance the special built and natural character of the borough, including its countryside, open space, Green Belt, and historic environment.

D.4 The likely sustainability effects of the four aims of the Issues and Options Traveller Local Plan in Chapter 3 of the Issues and Options Traveller Local Plan are set out in **Table D.1** and described below the table.

Table D.1 IIA findings for the Issues and Options Traveller Local Plan Aims

IIA objective	Aim 1	Aim 2	Aim 3	Aim 4
IIA1: Climate change mitigation	0	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Pitches	++?	0	+	0
IIA4: Health and wellbeing	+	+	0	0
IIA5: Services and facilities	0	+	0	0
IIA6: Social inclusion	0	+	++	0
IIA7: Crime and community safety	0	0	+	0
IIA11: Air pollution	0	+	0	0

IIA objective	Aim 1	Aim 2	Aim 3	Aim 4
IIA12: Sustainable transport	0	+	0	0
IIA13: Biodiversity	0	0	0	+
IIA14: Historic environment	0	0	0	+
IIA15: Landscape and townscape	0	0	0	+
IIA16: Efficient use of land	0	0	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

D.5 Aim 1 of the Issues and Options Traveller Local Plan seeks to provide a sufficient mix of, and type of, sustainable and high quality sites, which are distributed evenly across the borough to fully meet the assessed accommodation needs of the Traveller communities. This Aim is therefore likely to have a significant positive effect in relation to **IIA3: Pitches**. The effect is recorded as uncertain as it is not clear from this objective whether "assessed accommodation needs" refers to the Planning Policy for Traveller Sites (PPTS) definition of need or the cultural need (see Question 7 of the Issues and Options version of the Traveller Local Plan). The provision of high quality sites as sought by this aim could meet the requirements of a range of user types, including those with protected characteristics and so has the potential to promote personal and social wellbeing. This Aim is therefore also likely to have a minor positive effect in relation to **IIA4: Health and wellbeing**.

D.6 Aim 2 seeks to provide Traveller sites in areas that provide protection from flooding and enable adequate access to public transport, community facilities such as schools, health centres and shops. This could include facilities that support meetings related to pregnancy or maternity and faith groups, and so will have beneficial effects on those protected characteristics. Overall, the Aim is likely to have minor positive effects in relation to **IIA17: Flooding**, **IIA6: Social inclusion**, **IIA4: Health and wellbeing** and **IIA5: Services and facilities**. The Aim will ensure that sites are placed in locations where services and facilities are likely to be accessible, which has potential to reduce reliance on private vehicles and associated CO₂ emissions, while also helping to minimise air pollution. This will result in minor positive effects in relation to **IIA12: Sustainable transport**, **IIA1: Climate change mitigation** and **IIA11: Air pollution**. Reducing reliance on private vehicles will have beneficial effects on public health, including those vulnerable to air pollution, therefore contributing towards the minor positive effect already recorded in relation to IIA4.

D.7 Aim 3 seeks to reduce the number of unauthorised developments and encampments, in addition to increasing integration between Traveller communities and settled communities. As unauthorised sites and encampments are a source of tension between Traveller and settled communities, this Aim is expected to have a significant positive effect in relation to **IIA6: Social inclusion**, particularly as it seeks to increase integration. A minor positive effect is expected in relation to **IIA3: Pitches**, as this Aim will help reduce the number of unauthorised sites and encampments. A minor positive effect is also expected in relation to **IIA7: Crime and community safety**, as this objective seeks to reduce unauthorised developments and encampments.

D.8 Aim 4 seeks to protect and enhance the special built and natural character of the borough, including its countryside, open space, Green Belt and historic environment. As no further details are provided, minor positive effects are expected in relation to **IIA15: Landscape and townscape**, **IIA13: Biodiversity** and **IIA14: Historic environment**.

D.9 The aims are unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the contribution of the four aims to the achievement of the following IIA objectives is likely to be negligible: **IIA2: Climate change adaptation**, **IIA16: Efficient use of land** and **IIA18: Water**.

Recommendations

- Aim 1 could be reworded to make clearer whether the Traveller Local Plan seeks to meet the accommodation needs of the PPTS definition of Gypsies and Travellers or the cultural need.
- The relevant aims could be broadened to help achieve IIA2: Climate change adaptation through reference to sustainable design and construction techniques and adaptation to extreme weather events through things like building orientation.
- The relevant aims could be broadened to help achieve IIA16: Efficient use of land by avoiding development on high quality agricultural land, promoting development on brownfield sites and waste management.
- The relevant aims could be broadened to help achieve IIA18: Water through things like protecting water quality, sewerage and the incorporation of Sustainable Drainage Systems.

Objectives

D.10 The proposed objectives of the Issues and Options Traveller Local Plan are:

1. At least 21 permanent Traveller pitches and a transit / stop over site will be delivered during the plan period to meet the identified borough need.
2. Sites will be delivered in sustainable, suitable and safe and locations within Enfield, with high quality on-site provision specifically designed for Gypsy and Traveller use, and will have good access to facilities and services.
3. To use a negotiating stopping policy to meet the short-term needs of Travellers passing through the borough and expand the number of negotiated stopping places which can be used.
4. A clear framework will be provided for making decisions on future planning applications for Traveller sites within the borough.

D.11 The likely sustainability effects of the four objectives of the Issues and Options Traveller Local Plan in Chapter 3 of the Issues and Options Traveller Local Plan are set out in **Table D.2** and described below the table.

Table D.2 IIA findings for the Issues and Options Traveller Local Plan Objectives

IIA Objective	Objective 1	Objective 2	Objective 3	Objective 4
IIA1: Climate change mitigation	0	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Pitches	++/-	+	0	+?
IIA4: Health and wellbeing	+	+	+	0
IIA5: Services and facilities	0	++	0	0
IIA6: Social inclusion	0	+	+	+?
IIA7: Crime and community safety	0	+	+	0
IIA11: Air pollution	0	+	0	0
IIA12: Sustainable transport	0	+	0	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0

IIA Objective	Objective 1	Objective 2	Objective 3	Objective 4
IIA15: Landscape and townscape	0	0	0	0
IIA16: Efficient use of land	0	0	0	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

D.12 Objective 1 of the Issues and Options Traveller Local Plan seeks to provide at least 21 permanent Traveller pitches and a transit / stop over site during the plan period to meet the identified borough need. This will ensure an adequate supply of pitches is provided to meet the needs of Gypsies, Travellers and Travelling Showpeople. Therefore, a significant positive effect is expected in relation to **IIA3: Pitches**. The effect is coupled with a minor negative effect, as the 21 permanent Traveller pitches would meet the need of the Planning Policy for Traveller Sites (PPTS) definition of Gypsies and Travellers but not the cultural need. With regard to **IIA4: Health and wellbeing**, the provision of a stop-over site would allow Travellers to stop off on a temporary basis, and this would therefore be likely to have minor positive effects in relation to this objective, as it would give them more stability which in turn promotes wellbeing.

D.13 Objective 2 seeks to deliver sites in sustainable, suitable and safe locations within Enfield, with high quality on-site provision specifically designed for Gypsy and Traveller use, and will have good access to facilities and services. The provision of sites in sustainable, suitable, and safe locations within Enfield would help meet the requirements of a range of user types, including those with protected characteristics, and help to promote personal and social wellbeing. The delivery of sites with high quality on-site provision specifically designed for Gypsy and Traveller use, and good access to facilities and services is therefore likely to have a significant positive effect in relation to **IIA5: Services** and facilities and a minor positive effect in relation to **IIA3: Pitches**. With regard to IIA5, this could include access to community facilities such as schools, health centres and shops, as well as facilities which support meetings related to pregnancy or maternity and faith groups, and so will have beneficial effects on those protected characteristics. Access to services and facilities will help to support the needs of the Traveller community in a variety of ways, which will enhance their wellbeing, and therefore a minor positive effect is anticipated in relation to **IIA4: Health and Wellbeing** and **IIA6: Social Inclusion**. Furthermore, this objective is likely to have minor positive effects in relation to **IIA12: Sustainable Transport**, **IIA1: Climate Change Mitigation** and **IIA11: Air pollution** as high quality on-site provision and placing sites where services and facilities are likely to be accessible has the potential to reduce reliance on private vehicles which would reduce CO₂ emissions thus helping to minimise air pollution. This will also have beneficial effects on the protected characteristics, particularly to those vulnerable to air pollution. This objective is likely to have minor positive effects against **IIA7: Crime and community safety** as sites will be placed in safe locations, which will help to increase the perception of safety from crime.

D.14 Objective 3 seeks to use a negotiating stopping policy to meet the short-term needs of Travellers passing through the borough, and expand the number of negotiated stopping places. Therefore, a minor positive effect is expected in relation to **IIA7: Crime and community safety**. The provision of a negotiating stopping policy will help to reduce the number of unauthorised sites and encampments, as it will allow Travellers to negotiate to remain where they are or move to an alternative location nearby. This is likely to have a minor positive effect with regard to **IIA4: Health and Wellbeing** as Travellers will be much less likely to be evicted or prosecuted for roadside stopping, which gives Travellers more stability and reduced stress at the threat of eviction. This objective is also likely to have a minor positive effect in relation to **IIA6: Social Inclusion** as unauthorised sites can be a source of tension between Traveller and settled communities. Minimising these could therefore have beneficial effects on social cohesion.

D.15 Objective 4 seeks to provide a clear framework for making decisions on future planning applications for Traveller sites within the borough. Uncertain minor positive effects are recorded in relation to **IIA3: Pitches** and **IIA6: Social Cohesion** as the provision of a clear framework may ensure Traveller sites are provided where and when needed. However, uncertainty is recorded as no further details have been provided.

D.16 The aims are unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the contribution of the four objectives to the achievement of the following IIA objectives is likely to be negligible: **IIA2: Climate change adaptation, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land, IIA17: Flooding and IIA18: Water.**

Recommendations

- Further detail could be added in relation to Objective 4, as at present it is lacking in detail.

Issues and Options

D.17 This section presents the IIA findings of Chapter 4 (Issues and Options) of the Issues and Options Traveller Local Plan.

Question 7

Q7: Should the Traveller Local Plan seek to only provide for the accommodation needs of those who still travel (21 pitches) or should it also seek to include the needs of those who culturally identify themselves as Travellers but who are not travelling (a further 2 pitches) giving a total requirement of 23 pitches.

- **Option 1:** Provide for the 'cultural' need (23 pitches)
- **Option 2:** Provide for the Planning Policy for Traveller Sites need (21 pitches)

Table D.3 IIA findings for Q7

IIA objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Pitches	++	++/-
IIA4: Health and wellbeing	+	+/-
IIA5: Services and facilities	0	0
IIA6: Social inclusion	+	+/-?
IIA7: Crime and community safety	0	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

D.18 The Gypsy and Traveller Accommodation Needs Assessment 2020 establishes an overall 'cultural' need for 23 pitches, which is a slightly higher than the Planning Policy for Traveller Sites definition of need at 21 pitches. The PPTS definition has been challenged and through case law has been expanded to include those who are unable to travel, for instance through illness or disability. Option 2 which utilises this narrower definition receives a mixed significant positive and minor negative effect in relation to **IIA3: Pitches**. The significant positive effect acknowledges the fact that the needs of the PPTS definition of Gypsies and Traveller would be met, while the minor negative effect acknowledges the fact that the needs of those who no longer travel would not be met. Option 1 is expected to have a significant positive effect only, as it meets the accommodation needs of all, including those who no longer travel and which is likely to include older people.

D.19 Option 2 receives a mixed minor positive and minor negative effect in relation to **IIA4: Health and wellbeing**, as while it will meet the needs of the PPTS definition of Gypsies and Travellers, it will not meet the cultural need and so could have an adverse effect on personal and social wellbeing. Option 2 also receives a mixed minor positive and minor negative effect in relation to **IIA6: Social inclusion** as not meeting the cultural need would not accord with the Council's wider obligations to meet all needs, and may contribute to an increase in unauthorised developments and encampments which can be a source of tension between Traveller communities and settled communities, although this is uncertain. Option 1 receives minor positive effects in relation to IIA2 and IIA6, as it will contribute to the needs of all Gypsies and Travellers, including those who have ceased to travel.

D.20 Negligible effects are expected against the remaining IIA objectives.

Recommendations

- No recommendations.

Question 9

Q9: Which of the identified policy options above are most appropriate for the Traveller Local Plan? Please explain your answer.

- **Option 1:** Allocate small new sites
- **Option 2:** Allocate one large site
- **Option 3:** Provide pitches as part of large housing developments
- **Option 4:** Liaise with neighbouring local authorities to address the identified need
- **Option 5:** Do nothing

Table D.4 IIA findings for Q9

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA1: Climate change mitigation	+?/-?	-?	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0
IIA3: Pitches	++/-?	++	++	++	0
IIA4: Health and wellbeing	+?/-?	+?/-?	++?/-	+?/-?	0
IIA5: Services and facilities	+?/-?	+?/-?	++/-	--?/+?	0
IIA6: Social inclusion	+?/-?	-?	+?/-?	+?/-?	0
IIA7: Crime and community safety	0	0	0	0	0

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA11: Air pollution	+?/-?	-?	0	0	0
IIA12: Sustainable transport	+?/-?	-?	0	0	0
IIA13: Biodiversity	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land	+	0	0	0	0
IIA17: Flooding	0	0	0	0	0
IIA18: Water	0	0	0	0	0

D.21 Options 1 to 4 are expected to have significant positive effects in relation to **IIA3: Pitches** as they will all deliver the identified permanent need for pitches. The significant positive effect for Option 1 is, however, coupled with an uncertain minor negative effect, as it is possible that due to the size of the sites, they are more likely to be privately owned and therefore not affordable, although this is uncertain. The significant positive effect for Option 4 is recorded as uncertain, as neighbouring authorities may not have the capacity to take on additional need from elsewhere, which could potentially result in a shortfall in sites.

D.22 A mixed uncertain minor positive and uncertain minor negative effect is expected in relation to **IIA5: Services and facilities** for Option 1. This is because the small new sites could be allocated in urban areas or rural areas, and therefore depending on their location may have good or poor access to existing services and facilities. For this reason, Option 1 is expected to have mixed uncertain minor positive and uncertain minor negative effects in relation to **IIA4: Health and wellbeing** and **IIA6: Social inclusion**, as these objectives cover things like access to healthcare and community facilities which can have positive effects on people's health and wellbeing. A mixed uncertain minor positive and uncertain minor negative effect is also expected in relation to **IIA12: Sustainable transport**, as Option 1 could either increase or decrease reliance on private vehicles. Option 2 is likely to have an uncertain minor negative effect in relation to IIA5, in addition to IIA4 and IIA6 as according to the Issues and Options Traveller Local Plan, the site would likely be located in a rural area, outside of settlements and so in a less accessible location. Therefore, Travellers would have poor access to everyday amenities, in addition to things like employment opportunities. This would also increase reliance on private vehicles, resulting in an uncertain minor negative effect in relation IIA12. The increased reliance on private vehicles has the potential to contribute towards air pollution, in addition to greenhouse gas emissions, and so an uncertain minor negative effect is also expected for Option 2 in relation to **IIA11: Air pollution** and **IIA1: Climate change mitigation**. As Option 1 could either increase or decrease reliance on private vehicles, it is expected to have mixed uncertain minor positive and uncertain minor negative effects in relation to IIA11 and IIA1. Option 2 does, however, propose the allocation of one large site, and it is more viable for larger sites compared to smaller sites (Option 1) to incorporate amenities like sewerage, water supply, electricity and utility buildings. The uncertain minor negative effects Option 2 has in relation to IIA4 and IIA5 are therefore mixed with uncertain minor positive effects.

D.23 Option 3 is expected to have an uncertain significant positive effect in relation to **IIA5: Services and facilities**, as the pitches would be integrated into large housing developments and therefore contribute towards creating sustainable, mixed communities. According to the Issues and Options Traveller Local Plan, larger schemes like this would most likely be located in areas with good access to existing services and facilities. This could include facilities that support meetings related to pregnancy or maternity and faith groups. However, large schemes can take a long time to be delivered, which could result in new services and facilities not being delivered until development is almost complete. Therefore, the effect is coupled with an uncertain minor negative effect. Option 3 is also expected to have a mixed uncertain significant positive and uncertain minor negative effect in relation to **IIA4: Health and wellbeing**, as pitches would most likely

be located close to existing healthcare facilities and other services within new developments, and could therefore be accessed more easily by walking or cycling, which has beneficial effects on people's health and wellbeing. However, large schemes as proposed under this option can take a long time to be delivered and therefore may not initially meet people's everyday needs. A mixed uncertain minor positive and uncertain minor negative effect is expected for Option 3 in relation to **IIA6: Social inclusion**, as it would contribute towards the creation of mixed communities. However, integrating pitches into large new housing developments could generate some issues with social cohesion between Traveller and settled communities. Option 4 is expected to have a mixed uncertain significant negative and uncertain minor positive effect in relation to IIA5, as although sites may be allocated near settlements with good access to services and facilities, some (or all) of them could be located in neighbouring boroughs, which is unlikely to be convenient for most people whose need for accommodation arises in the borough. For this reason, mixed uncertain minor positive and uncertain minor negative effects are also expected in relation to IIA4 and IIA6. Travellers may feel isolated from others and introducing them into existing communities elsewhere could be contentious and cause conflict.

D.24 Option 1 is expected to have an uncertain minor positive effect in relation to **IIA16: Efficient use of land** as the allocation of small new sites, particularly within urban areas, could encourage the utilisation of brownfield sites, although this is uncertain. Negligible effects are expected against the remaining IIA objectives.

D.25 Option 5 (Do nothing) represents the baseline against which the effects of the Issues and Options Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objectives.

Recommendations

- No recommendations.

Questions 12 to 13

Q12: If allocating more than one site to meet the identified permanent need, what would be an appropriate site size (in hectares) to allocate? Please explain your answer.

Q13: If allocating more than one site to meet the identified permanent need, how many pitches should be allocated per site? Please explain your answer.

- **Option 1:** Allocate a larger number of smaller sites
- **Option 2:** Allocate a smaller number of larger sites

Table D.5 IIA findings for Q12-13

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Pitches	++/-?	++
IIA4: Health and wellbeing	+/-?	+?/-
IIA5: Services and facilities	-?	+?
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	0	0
IIA11: Air pollution	0	0

IIA Objective	Option 1	Option 2
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	+	-
IIA17: Flooding	0	0
IIA18: Water	0	0

D.26 Option 1 seeks to allocate a larger number of smaller sites, while Option 2 seeks to allocate a smaller number of larger sites. Both options are likely to have a significant positive effect in relation to **IIA3: Pitches** as they both seek to provide sufficient pitches to meet the assessed accommodation needs of the Traveller communities. However, smaller sites are more likely to be privately owned, which may result in pitches not being affordable. As such, the significant positive effect against IIA3 for Option 1 is coupled with an uncertain minor negative effect.

D.27 Options 1 and 2 are both expected to have minor positive effects in relation to **IIA4: Health and wellbeing**, as ensuring all Travellers have a pitch will have beneficial effects on their health and wellbeing. With regard to Option 2, it is more viable for larger sites to incorporate everyday amenities like sewerage, water supply, electricity and utility buildings, which would help contribute towards this minor positive effect. It would, however, add some uncertainty as it is unknown whether these amenities would be delivered or not. As Option 1 proposes smaller sites it is unlikely that everyday amenities would be provided, and so the minor positive effect is mixed with an uncertain minor negative effect. The Issues and Options version of the Traveller Local Plan acknowledges that stakeholders prefer smaller sites as this is a more comfortable environment and so while this would contribute to the minor positive effect already recorded for Option 1 against IIA4, it would result in the minor positive effect for Option 2 being coupled with a minor negative effect.

D.28 Option 2 is expected to have an uncertain minor positive effect in relation to **IIA5: Services and facilities**, as it is likely to be more viable for larger sites to incorporate things like sewerage, water supply, electricity and utility buildings than smaller sites where this may not be viable. Conversely, Option 1 is expected to have an uncertain minor negative effect as it may not be viable for smaller sites to provide these sorts of amenities. It is unknown where sites proposed by these two options would be located.

D.29 Option 2 is expected to have an uncertain minor negative effect in relation to **IIA15: Efficient use of land**, as larger sites may utilise more greenfield land, which may be high quality agricultural land. Conversely, Option 1 is expected to have an uncertain minor positive effect in relation to this objective as it may not utilise as much greenfield land as Option 2, and may in fact encourage utilisation of brownfield sites.

D.30 Negligible effects are expected against the remaining IIA objectives.

Recommendations

- No recommendations.

Question 14

Q14: Should the Traveller Local Plan consider including a rural exception sites policy? If so, please explain your answer.

- **Option 1:** Include a rural exception sites policy

■ **Option 2:** Do not include a rural exception sites policy

Table D.6 IIA findings for Q14

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	-	0
IIA2: Climate change adaptation	0	0
IIA3: Pitches	++	-
IIA4: Health and wellbeing	+/-	-
IIA5: Services and facilities	-	0
IIA6: Social inclusion	-	0
IIA7: Crime and community safety	0	0
IIA11: Air pollution	-	0
IIA12: Sustainable transport	-	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	-?	0
IIA16: Efficient use of land	-?	0
IIA17: Flooding	0	0
IIA18: Water	0	0

D.31 Option 1 supports the inclusion of a rural exception sites policy, which would enable sites to come forward where Traveller sites would not normally be allowed and ensure that these sites remain affordable in perpetuity. This is likely to have a significant positive effect in relation to **IIA3: Pitches** as this option would ensure there are affordable Traveller pitches. This option is also likely to have a minor positive effect in relation to **IIA4: Health and wellbeing** as housing is an important social determinant of health, and the provision of affordable pitches for Traveller accommodation would reduce accommodation insecurity which would in turn improve wellbeing and general health outcomes. The minor positive effect against IIA4 is, however, mixed with a minor negative effect, as a rural exception site could be located in an area with poor access to services and facilities, including healthcare, which could have adverse effects on people's health. Option 2 does not support the inclusion of a rural exception sites policy, and so is likely to have a minor negative effect in relation to IIA3, as well as IIA4, as the opportunity to provide permanent and genuinely affordable Traveller sites would be missed and potentially result in a shortfall of affordable Traveller pitches. This is likely to have implications for health and wellbeing as health outcomes and quality housing are interconnected; a lack of affordable housing / sites contributes to a myriad of mental health problems, such as stress, anxiety and depression.

D.32 Option 1 is likely to have a minor negative effect in relation to **IIA12: Sustainable transport**, as rural areas tend to have poorer access to jobs, services and facilities than towns, and continue to lose services and facilities. By siting Traveller sites in rural areas where housing would not normally be allowed, it would encourage private vehicle use so as to reach essential services. Therefore, Option 1 is also expected to have minor negative effects in relation **II1: Climate change mitigation** and **IIA11: Air pollution**, in addition to **IIA5: Services and facilities**. Travellers may also experience feelings of isolation being located in a rural area away from settlements, and therefore a minor negative effect is expected in relation to **IIA6: Social**

inclusion. Uncertain minor negative effects are expected in relation to **IIA15: Landscape and townscape** and **IIA16: Efficient use of land**, as the allocation of sites in rural areas where housing development would not normally be allowed could have adverse effects on the landscape and agricultural land, although this is uncertain.

D.33 Negligible effects are expected against the remaining IIA objectives.

Recommendations

- No recommendations.

Question 15

Q15: Which of these management options is preferred? Please explain your answer.

- **Option 1:** Allocated land is sold to Travellers who then have the responsibility of equipping the site in the same way that this happens on privately owned sites at present.
- **Option 2:** Allocated sites form part of the affordable housing provided on a private housing development. In such cases the developer would in all probability put in access, land drainage, sewerage, water and electricity as a minimum. Pitches could be sold or rented but would have to remain affordable. This is usually achieved by the involvement of a Registered Social Landlord but there may be other ways of achieving this.
- **Option 3:** The Council or Registered Social Landlord buys allocated land, provides the facilities as per option 2 above and then sells or rents the site to the occupants. The Council or Registered Social Landlord retains a role in site management if the site is rented to the occupants.
- **Option 4:** The land is privately owned and rented to the occupants with or without facilities. The site owner is most likely to manage the maintenance of the site if it remains in his/her ownership.
- **Option 5:** A variety of means of tenure could be spread across the allocated sites.

Table D.7 IIA findings for Q15

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA1: Climate change mitigation	0	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0
IIA3: Pitches	+?/-?	++	++?/-?	+?/-?	+
IIA4: Health and wellbeing	0	+	+	+?/-?	0
IIA5: Services and facilities	0	+	+	+?/-?	0
IIA6: Social inclusion	0	+/-	0	-	0
IIA7: Crime and community safety	0	0	0	+/-	0
IIA11: Air pollution	0	0	0	0	0
IIA12: Sustainable transport	0	0	0	0	0
IIA13: Biodiversity	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land	0	0	0	0	0
IIA17: Flooding	0	0	0	0	0

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA18: Water	0	0	0	0	0

D.34 Both Options 2 and 3 are anticipated to have significant positive effects in relation **IIA3: Pitches**. Option 2 seeks to provide allocated sites which form part of the affordable housing provided on a private housing development, while Option 3 states that the Council or Registered Social Landlord will buy the allocated land and then sell or rent the site to occupants. Both options would ensure that there is sufficient supply of affordable sites to meet the needs of Gypsies and Travellers. However, the effect for Option 3 is coupled with a minor negative effect, with both effects recorded as uncertain. This is due to the fact the site could be sold to Travellers but it is unknown whether it would be affordable or not. Both options seek to make provision for facilities which include access, land drainage, sewerage, and water and electricity as a minimum. This will improve the quality of sites for Travellers. Minor positive effects are expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** due to good access and connectivity to essential facilities and services, which have clear health and wellbeing benefits. Option 4 is likely to have a mixed uncertain minor positive and uncertain minor negative effect in relation to IIA3, as well as mixed uncertain minor positive and uncertain minor negative effects in relation to IIA4 and IIA5, as the land allocated to Travellers will be privately owned and rented to the occupants with or without facilities. As the sites will be privately owned, they could be expensive, which could potentially see an increase in unauthorised developments and encampments which are a source of tension between Traveller communities and settled communities. This Option could therefore also have a minor negative effect in relation to **IIA6: Social inclusion**. Option 2 is expected to have a mixed minor positive and minor negative effect in relation to IIA6, as integrating affordable pitches into new housing developments could create tensions between Traveller and settled communities. Option 1 is expected to have a mixed uncertain minor positive and uncertain minor negative effect in relation to IIA3, as the land would be sold to Travellers who are then responsible for the site. However, it is unknown how affordable purchasing the site would be, which may not be viable for some.

D.35 A mixed minor positive and minor negative effect is expected for Option 4 in relation to **IIA7: Crime and community safety**, as the sites would be privately owned, which could make them expensive and potentially result in an increase in unauthorised developments and encampments. However, the option also stipulates that the site owner is most likely to manage the maintenance of the site if it remains in his/her ownership. This would ensure that the site is effectively managed and maintained, which would discourage crime.

D.36 Option 5 seeks to provide a variety of means of tenures to be spread across the allocated sites. An uncertain minor positive effect is therefore recorded in relation to **IIA3: Pitches** as the addition of different means of tenures; socially-owned and managed-sites as well as scope to incorporate alternative methods of site management and ownership, for example in the form of co-operatives, could provide innovative solutions to tackle deliverability. However, uncertainty is recorded as no further details have been provided.

D.37 Negligible effects are expected against the remaining IIA objectives.

Recommendations

- Options 2 and 3 refer to various amenities that should be provided at all sites. In addition to these amenities, developers (including the Council or Registered Social Landlord) should ensure any building they provide meets high energy efficiency standards in line with the Council's commitment to be a carbon neutral organisation by 2030 and a carbon neutral borough by 2040. Consideration should also be given to adaptation through design (e.g. building orientation) to better respond to extreme weather conditions as a result of climate change.

Question 16

Q16: Should the Traveller Local Plan contain a policy relating to design requirements for new Traveller sites? If so, what matters should be included?

- Option 1:** Include a design policy

■ **Option 2: Do not include a design policy**

Table D.8 IIA findings for Q16

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	+	0
IIA3: Pitches	+	0
IIA4: Health and wellbeing	+	0
IIA5: Services and facilities	0	0
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	+	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	+	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

D.38 Option 1 supports the inclusion of a design policy for new Traveller sites. This is likely to have a minor positive effect in relation to **IIA15: Landscape and townscape** and **IIA3: Pitches**, as providing design requirements would help ensure that there are consistently high-quality sites being designed and created for Travellers. This Option is also likely to have an uncertain minor positive effect in relation to **IIA2: Climate change adaptation**. Although the Option does not provide detail of what the policy would include, good design is understood as a key aspect of sustainable development, and therefore this policy could detail design which responds to climate change adaptation. Uncertain minor positive effects are also anticipated in relation to **IIA4: Health and wellbeing** and **IIA7: Crime and community safety**, as design requirements which promote well-designed sites will create safer and more sustainable Traveller sites, with beneficial effects on people's health. Negligible effects are expected against the remaining IIA objectives.

D.39 Option 2 (Do not include a design policy) represents the baseline against which the effects of the Issues and Options Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objective.

Recommendations

- A design policy should address climate change mitigation and adaptation by ensuring buildings are energy efficient and designed to respond to extreme weather events, respectively.

Question 17

Q17: Should the Traveller Local Plan provide for a transit site / stop over site, and if so, what size is considered suitable?

- **Option 1:** Provide a transit / stop over site
- **Option 2:** Do not provide a transit / stop over site

Table D.9 IIA findings for Q17

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Pitches	++	0
IIA4: Health and wellbeing	+	0
IIA5: Services and facilities	+?	0
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	+/-?	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

D.40 Option 1 is expected to have a significant positive effect in relation **IIA3: Pitches**, as providing a transit / stop over site will accommodate the needs of Gypsies and Travellers on the move. For this reason, Option 1 is expected to have a minor positive effect in relation **IIA4: Health and wellbeing**, as the presence of a transit / stop over site would reduce accommodation insecurity which would in turn improve wellbeing and general health outcomes. A minor positive effect is expected in relation to **IIA5: Services and facilities**, as if a transit site is provided it should have the same services as a permanent site, such as water supply, electricity and refuse collection. The effect is uncertain as the actual effect is dependent on whether a transit site or stop over site would be provided (stop over sites do not need to be equipped to the same standard as a permanent or transit site). The presence of a transit / stop over site could reduce unauthorised encampments and therefore a minor positive effect is expected in relation to **IIA7: Crime and community safety**. The effect is coupled with an uncertain minor negative effect, as the site would not provide permanent accommodation but there is a danger of it being used permanently. Negligible effects are expected against the remaining IIA objectives.

D.41 Option 2 (Do not provide a transit / stop over site) represents the baseline against which the effects of the Issues and Options Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objectives.

Recommendations

- No recommendations.

Appendix E

Site assessment criteria

Table E.1 Site assessment criteria and assumptions

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
<p>IIA objective 1: 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</p>							
<p>The extent to which the location of sites would facilitate the use of sustainable modes of transport in place of cars is considered separately under IIA objective 12 below. The location of sites will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Traveller Local Plan and details submitted at the planning application stage. Those policies in the Traveller Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.</p>							
<p>IIA objective 2: 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</p>							
<p>The extent to which flood risk can be managed and reduced is considered separately under IIA objective 17 below. The location of sites will not otherwise significantly affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the Traveller Local Plan and details submitted at the planning application stage. Those policies in the Traveller Local Plan have been appraised separately to the site options. This IIA objective has therefore been scoped out of the site options assessment.</p>							
<p>IIA objective 3: 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</p>							
<p>All site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for more pitches and so would have significant positive effects.</p>							
<i>3a Pitch provision</i>	Capacity for >=6 pitches	Capacity for <6 pitches	N/A	N/A	N/A	<p>■ Contained within the shapefile for each site</p>	Scoring of significance will match the major and minor effects.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
IIA objective 4: Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the Borough							
<p>Sites that are close to existing healthcare facilities (i.e. GP surgeries) will help to ensure that residents have good access to healthcare services. Other factors not captured by the assessment of site options include there being capacity at those healthcare facilities to accommodate new residents and whether new residential development supports the provision of additional healthcare capacity.</p> <p>Public health will also be influenced by the proximity of sites to open spaces, walking and cycle paths, easy access to which can encourage participation in active outdoor recreation.</p>							
<i>4a GP surgeries</i>	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	>800m from nearest NHS GP surgery	N/A	<ul style="list-style-type: none"> ■ LBE GP surgeries 	Each criterion 4a to 4d is scored: <ul style="list-style-type: none"> ■ Major positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Major negative -3 Scores totalled and then averaged (i.e. total score divided by 4). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >=2
<i>4b Access to recreation</i>	<=800m from open space, including Metropolitan Open Land and green loops/links AND <=400m from walking or cycle path	<=800m from open space, including Metropolitan Open Land and green loops/links OR <=400m from walking or cycle path	N/A	>800m from open space, including Metropolitan Open Land and green loops/links AND >400m from walking or cycle path	N/A	<ul style="list-style-type: none"> ■ LBE open spaces (excluding cemeteries, churchyards and civic spaces) ■ LBE Metropolitan Open Land ■ LBE green loops ■ LBE green links ■ LBE Lee Valley Regional Park ■ LBE Public Rights of Way ■ Sustrans National and 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> Regional Cycle Routes LBE local cycle routes 	<ul style="list-style-type: none"> Minor positive >0 to <2 Negligible 0 Minor negative <0 to >-2 Significant negative <=-2
<i>4c Loss of recreation</i>	N/A	N/A	All other sites.	N/A	Contains existing open space <ul style="list-style-type: none"> LBE open spaces (excluding cemeteries, churchyards and civic spaces) LBE Metropolitan Open Land LBE Lee Valley Regional Park 		
<i>4d Acoustic privacy</i>	N/A	N/A	No noise issue or existing acoustic barriers	Noise issue near site which may require mitigation	Major noise issue on or close to site requiring mitigation before site can be used	<ul style="list-style-type: none"> Site Selection Methodology 	
<p>IIA objective 5: 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.</p> <p>The effect of site options on the educational element of this objective was assessed on the basis of the access that they provide to existing educational facilities. Other factors not captured by the assessment of site options include to there being capacity at those schools to accommodate new pupils. The access a site has to more general services and facilities is considered separately under IIA objective 10 below.</p>							
<i>5a Education</i>	<=800m from one existing primary school	<=800m from one existing primary school	N/A	>800m from existing primary	N/A	<ul style="list-style-type: none"> LBE primary schools 	Scoring of significance will match the major

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
	AND ≤800m from existing secondary school	OR ≤800m from existing secondary school		or secondary school		■ LBE secondary schools	and minor effects.
IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity							
Incorporating sites into large schemes will contribute towards creating sustainable, mixed communities, when compared to isolated sites. Therefore, sites incorporated into existing or planned new residential schemes will encourage social inclusion, promotion of equality and respect through diversity. Effects may be subject to a degree of uncertainty, as there is some potential for social cohesion issues between Traveller and settled communities.							
<i>6a Social inclusion</i>	N/A	Site within existing or planned new community	N/A	Site outside of existing or planned new community	N/A	■ LBE	Scoring of significance will match the minor effects. However, all effects to acknowledge uncertainty (?) : ■ Minor positive +? ■ Minor negative -?
IIA objective 7: Reduce crime and increase community safety							
The effects of new sites on levels of crime and fear of crime will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of sites; rather they will be determined through the policies in the Traveller Local Plan and detailed proposals for each site. This objective was therefore scoped out of the site options assessment.							
IIA objective 11: Minimise air pollution							
The assessment of effects of site options in relation to air quality focuses on the variation across the Borough in baseline concentrations of key air pollutants and how development at different locations would result in different levels of exposure to these pollutants.							

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
<p>In 2021, WHO updated its recommended guidelines for air pollutants (“WHO global air quality guidelines: particulate matter (PM_{2.5} and PM₁₀), ozone, nitrogen dioxide, sulfur dioxide and carbon monoxide” - https://www.who.int/publications/i/item/9789240034228). The new air quality guidelines reflect the best available health evidence and WHO’s recommendations continue to be recognised globally as the targets that should be met to protect public health. Minor negative effects are assumed to occur when sites would be in a location where the current baseline annual mean concentration of a pollutant (per LAEI 2019 data) exceeds these 2021 WHO guidelines. Major negative effects are assumed to occur in locations where current annual mean pollution exceeds both the 2021 WHO air quality guidelines and the higher pollution levels allowed under the UK’s national air quality objectives (see https://uk-air.defra.gov.uk/assets/documents/Air_Quality_Objectives_Update_20230403.pdf).</p> <p>We do not give consideration to whether a site is within or outside of an Air Quality Management Area (AQMA) under this objective, as the whole Borough has been declared an AQMA. This is as a result of a 2011 air quality assessment that showed the 1 hour mean objective of 200µg m-3 (not to be exceeded more than 18 times a year) for NO₂ and 24 hour mean objective of 50µg m-3 (not to be exceeded more than 35 days in one year) for PM₁₀ to have been exceeded in parts of the Borough. If the assessment of site options were to give consideration to the AQMA, all site options would receive the same effect, which would not help in identifying which ones perform better or worse in air quality terms.</p> <p>The assessment of site options has not taken into account planned measures that will improve future air quality (such as the expansion of the Ultra Low Emissions Zone across all London boroughs in 2023 or the ban on sale of new petrol and diesel cars in 2035), or site-specific mitigation.</p>							
11a NO ₂ pollution	N/A	N/A	0-10 µg/m ³	10-40 µg/m ³	>40 µg/m ³	LAEI annual mean ground level concentration 2019 Source: https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019 (this also includes the WHO Guidelines for air quality)	Each criterion 11a to 11c is scored: ■ Negligible 0 ■ Minor negative -1 ■ Major negative -3 Scores totalled and then averaged (i.e. total score divided by 3). Overall, significance is
11b PM ₁₀ pollution	N/A	N/A	0-15 µg/m ³	15-40 µg/m ³	>40 µg/m ³	https://www.enfield.gov.uk/data/assets/pdf_file/0011/301	
11c PM _{2.5} pollution	N/A	N/A	0-5 µg/m ³	5-20 µg/m ³	>20 µg/m ³		

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						43/Air-quality-status-report-2022-Environment.pdf https://www.iqair.com/uk/england/enfield	scored as follows: <ul style="list-style-type: none"> ■ Negligible 0 ■ Minor negative <0 to >-2 ■ Significant negative <=-2
IIA objective 12: Minimise the need to travel and support a modal shift away from the private car							
Enfield’s facilities and services are concentrated within the Borough’s Major, District and Local Centres and sites located close to these will help to reduce the need to travel. In addition, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people’s behaviour. Public Transport Accessibility Levels (PTAL) provide a detailed and accurate measure of the connectivity of a location to the public transport network, taking into account walk access time and service availability. PTAL does not take into account the destinations you can travel to from each location or the ease of interchange; PTAL also does not reflect levels of crowding on buses or trains. It is possible that new services and facilities and transport links such as bus routes or cycle paths will be provided as part of new developments, particularly at larger sites, but this was not assumed in assessing site options.							
<i>12a Sustainable transport</i>	PTAL = 5 or 6a	PTAL = 4	PTAL = 3	PTAL = 2	PTAL = 0, 1a or 1b	<ul style="list-style-type: none"> ■ London Datastore PTAL ratings 	Each criterion 12a to 12b is scored:
<i>12b Services and facilities</i>	<=200m of Major, District or Local Centres	201-400m of Major, District or Local Centres	N/A	401-800m of Major, District or Local Centres	>800m of Major, District or Local Centres	<ul style="list-style-type: none"> ■ LBE Major Centres ■ LBE District Centres ■ LBE Local Centres 	<ul style="list-style-type: none"> ■ Major positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Major negative -3 Scores totalled and then

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							averaged (i.e. total score divided by 2). Overall, significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive ≥ 2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to >-2 ■ Significant negative ≤ -2
IIA objective 13: Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks							
<p>Sites that are close to internationally, nationally or locally designated conservation sites have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, or increased recreation pressure.</p> <p>Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, it is generally not proportionate to attempt to identify the particular biodiversity assets present at different locations and their sensitivity to different types of development (although Impact Risk Zones defined by Natural England provide a useful proxy for this in relation to SSSIs and internationally designated sites). Instead, this would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Open space, including Metropolitan Open Land and Green Chains, is addressed below under IIA objective 15.</p>							
13a <i>International and national</i>	N/A	N/A	All other sites	Intersects with 'all planning applications',	Intersects with internationally	■ Natural England SSSI	If any of the criteria receive a major negative

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
<p><i>biodiversity and geodiversity assets</i></p>				<p>'residential' or 'rural residential' IRZ²⁷¹</p>	<p>or nationally designated site</p>	<p>Impact Risk Zones</p> <ul style="list-style-type: none"> ■ Natural England Special Area of Conservation ■ Natural England Special Protection Area ■ Natural England Ramsar site ■ Natural England National Nature Reserve <p>The 'all planning applications' and 'rural residential' IRZs only relate to development outside or extending outside of existing settlements/urban areas.</p> <p>Use the following dwelling capacity</p>	<p>effect then the score is significant negative.</p> <p>If both criteria 13a and 13b receive a minor negative effect then the score is significant negative.</p> <p>If only one of criteria 13a and 13b receive a minor negative effect then the score is minor negative.</p> <p>For all other sites, the score is negligible.</p>

²⁷¹ Impact Risk Zones defined by Natural England are used to provide an initial assessment of the potential risks posed by development proposals to: Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and Sites of Special Scientific Interest (SSSIs). Note that all SACs, SPAs and Ramsar sites are also designated as SSSIs, in addition to National Nature Reserves. Therefore, SSSIs are used as a proxy for all these designations in the IIA.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						categories to establish relevance of IRZ: <ul style="list-style-type: none"> – 500+ – 100+ – 50+ – 10+ ■ GIS settlement boundaries	
<i>13b Locally designated wildlife sites, Priority Habitat Inventory and Ancient Woodland</i>	N/A	N/A	All other sites	<=250m from a locally designated site, Priority Habitat or Ancient Woodland	Intersects with a locally designated site, Priority Habitat or Ancient Woodland	■ LBE Local Wildlife Sites (also referred to as Sites of Importance for Nature Conservation, Sites of Nature Conservation Interest, Sites of Metropolitan/Borough/Local Importance, or other locally-specific terms) ■ Natural England Local Nature Reserves ■ Natural England/LBE Priority Habitat Inventory	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> ■ Natural England Ancient Woodland Inventory 	
IIA objective 14: Sustain and enhance the significance of heritage assets							
<p>The NPPF states that the significance of a heritage asset can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. However, development could also enhance the significance of the asset, provided that the development preserves those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In all cases, effects from a site allocation will be subject to a degree of uncertainty as the actual effects on heritage assets will depend on the particular scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features, for example where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect.</p> <p>The proximity tests outlined below are intended to provide a basis for screening for the potential for adverse effects on heritage assets but in the absence of a separately commissioned historic environment sensitivity study or similar of all reasonable alternative site options they are subject to a high degree of uncertainty. Distances used are based on professional judgement. Longer screening distances are used for site options outside of existing settlements to reflect typically longer sightlines in rural vs. urban areas.</p>							
<i>14a Proximity to historic assets: sites within existing settlements</i>	N/A	N/A	All other sites	101-250m	<=100m	<ul style="list-style-type: none"> ■ Historic England listed buildings ■ Historic England scheduled monuments ■ Historic England parks and gardens ■ LBE conservation areas 	Scoring of significance will match the major, minor and negligible effects. However, all effects to acknowledge uncertainty (?) in the absence of a heritage impact assessment: <ul style="list-style-type: none"> ■ All other 0?
<i>14b: Proximity to historic assets: sites outside of existing settlements</i>	N/A	N/A	All other sites	501-1,000m	<=500m		

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> ■ LBE locally listed heritage assets ■ LBE archaeological priority areas ■ GIS settlement boundaries 	<ul style="list-style-type: none"> ■ Minor negative -? ■ Major negative --?
IIA objective 15: Protect and enhance the character, quality and diversity of the borough's landscapes and townscape							
<p>Enfield's 'Character of Growth Study' provides recommendations on the acceptable level of development and change in landscape and townscape terms for different areas of the Borough. Some site options were located in parts of the Borough located outside of the Character of Growth Study's scope (broadly those in the Green Belt or open spaces). IIA of these site options in landscape/ townscape terms fell back on a more simplistic appraisal method, based on the size of sites and whether they are located in urban or more rural areas. Actual effects on landscape and townscape will also depend on the design, scale and layout of development within the site, which may help mitigate and/or enhance effects on the existing townscape.</p>							
<i>15a Landscape and townscape</i>	N/A	N/A	Site falls within an area where 'Transformative Change' is recommended.	Site falls within an area where 'Medium Change' is recommended.	Site falls within an area where 'Limited Change' is recommended.	LBE 'Character of Growth' study, specifically: <ul style="list-style-type: none"> ■ 'Scale of Change Recommendation' map layer 	If any of the criteria receive a major negative effect then the score is significant negative.
<i>15b Open space</i>	N/A	N/A	All other sites	N/A	Contains existing open space	<ul style="list-style-type: none"> ■ LBE open spaces (excluding cemeteries, churchyards and civic spaces) 	If only one of criteria 15a and 15b receive a minor negative effect then the score is minor negative.

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
						<ul style="list-style-type: none"> ■ LBE Metropolitan Open Land ■ LBE Lee Valley Regional Park 	<p>For all other sites, the score is negligible.</p> <p>All effects to acknowledge uncertainty (?) in the absence of a landscape character assessment that can be translated into IIA effects.</p>
IIA objective 16: To achieve efficient use of land and materials							
<p>Appraisal of site options in relation to this IIA objective considered whether the site is clear and contains no buildings on site or contains buildings on site that could be converted for Gypsy and Traveller use, and also what quality of agricultural land it contains.</p> <p>Potential to convert existing buildings on a site for Gypsy and Traveller use represents a more efficient use of land in comparison to sites that contain no existing buildings. The effects of development on waste generation will depend largely on residents' behaviour. However, where development takes place on a site containing existing buildings there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.</p> <p>New sites are likely to result in the increased consumption of minerals for construction but this will not be influenced by the location of the site. The location of a site can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources in the Borough. However, there are no Minerals Safeguarding Areas within LBE so this issue was scoped out of the IIA of site options.</p>							
<i>16a Brownfield/greenfield land</i>	Building on site that can possibly be converted for Gypsy and Traveller use – all effects to	N/A	N/A	No building on site	N/A	<ul style="list-style-type: none"> ■ Site Selection Methodology 	If criterion 16a receives a major positive effect the site scores significant positive,

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
	acknowledge uncertainty						irrespective of criterion 16b.
<i>16b Agricultural Land Classification</i>	N/A	N/A	All other sites	Greenfield land classed as Grade 3 agricultural land	Greenfield land classed as Grades 1 or 2 agricultural land	<ul style="list-style-type: none"> ■ Natural England Agricultural Land Classification 	<p>If criterion 16a is not major positive, then each criterion 16a to 16b is scored:</p> <ul style="list-style-type: none"> ■ Major positive +3 ■ Minor positive +1 ■ Negligible 0 ■ Minor negative -1 ■ Major negative -3 <p>Scores totalled and then averaged (i.e. total score divided by 2). Overall, significance is scored as follows:</p> <ul style="list-style-type: none"> ■ Significant positive ≥ 2 ■ Minor positive >0 to <2 ■ Negligible 0

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							<ul style="list-style-type: none"> ■ Minor negative <0 to >-2 ■ Significant negative <=-2
IIA objective 17: To manage and reduce the risk of flooding							
<p>Site options were assessed by reference to the distribution of flood risk areas in the Borough.</p> <p>The effects of new development on this IIA objective will also depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. These factors are outside the scope of the site options appraisal.</p>							
<i>17a Flood zones</i>	N/A	N/A	All other sites	N/A	>=25% within Flood Zones 2 or 3	<ul style="list-style-type: none"> ■ Environment Agency Flood Map for Planning (Rivers and Sea) 	<p>If any of the criteria receive a major negative effect then the score is significant negative.</p> <p>If both criteria 17a and 17b receive a minor negative effect then the score is significant negative.</p> <p>If only one of criteria 17a and 17b receive a minor negative</p>
<i>17b Surface water flood risk</i>	N/A	N/A	All other sites	Contains land within the 'Medium' category for surface water flooding	Contains land within the 'High' category for surface water flooding	<ul style="list-style-type: none"> ■ Environment Agency Risk of Flooding from Surface Water map 	

Criteria	Major positive	Minor positive	Negligible	Minor negative	Major negative	Datasets and related notes	Significance scoring
							effect then the score is minor negative.
IIA objective 18: Minimise water use and protect water quality							
Levels of water consumption within new development will be determined by its design and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses, water bodies and Source Protection Zones. The extent to which water quality is actually affected would depend on construction techniques and the use of SuDS within the design.							
<i>18a Water quality</i>	N/A	N/A	All other sites	N/A	Site contains a watercourse, water body or falls within a Source Protection Zone	<ul style="list-style-type: none"> ■ Environment Agency Source Protection Zones ■ OS Open Map Local 	Scoring of significance will match the major and negligible effects.

Appendix F

Reasons for selecting or rejecting reasonable alternative site options

F.1 A Gypsy and Traveller Site Selection Methodology was prepared by the Council which sets out its approach taken to assess sites for selection as allocations. This is detailed in its Site Selection Topic Paper²⁷² and summarised in **Table F.1** below.

Table F.1 Summary of Council's Site Selection Methodology

Site Selection stage	Tasks involved
Stage 1: Identification and initial sift of sites	<ul style="list-style-type: none"> ■ Stage 1a: Identification of sites ■ Stage 1b: Assessment of absolute constraints ■ Stage 1c: Size threshold and planning history
Stage 2: Promoting a sustainable pattern of development	<ul style="list-style-type: none"> ■ Stage 2a: Sites considered on a sequential approach directing growth to specific locations
Stage 3: Detailed planning assessment	<ul style="list-style-type: none"> ■ Stage 3a: Consideration of technical constraints ■ Stage 3b: Consideration of other non-absolute constraints
Stage 4: Sustainability Appraisal as part of the Integrated Impact Assessment	<ul style="list-style-type: none"> ■ Stage 4: Appraisal of site options against the IIA objectives and identification of any significant negative effects that may require mitigation if site is put forward for allocation
Stage 5: Deliverability	<ul style="list-style-type: none"> ■ Stage 5: Does the evidence indicate that the site could be delivered within the Plan period?
Stage 6: Overall conclusion	<ul style="list-style-type: none"> ■ Stage 6: Indication of preferred site allocations.

F.2 Following application of its Site Selection Methodology, the Council's reasons for selecting or rejecting the sites are detailed in its Site Selection Topic Paper²⁷³. For those sites assessed by the IIA as reasonable alternatives, the reasons for selection or rejection are summarised in the **Table F.2** below.

Table F.2 Reasons for selecting or rejecting reasonable alternative Traveller site options

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_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

²⁷² Enfield Council (2025) Site Selection Topic Paper

²⁷³ Ibid

Site Reference	Site name / address	Conclusion after Site Selection Methodology applied
		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_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.

F.3 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 above, three specific sites and two broad locations were 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).