

Traveller Local Plan 2020-2041

Meeting the needs of Gypsies, Travellers and Travelling Showpeople

Regulation 19 Submission Plan

For public Consultation

September 2025

Consultation Details

Consultation on initial issues and options, and the Draft Plan (including proposed allocations) for the Traveller Local Plan (TLP) was undertaken in autumn 2023 and autumn 2024. The Council has considered all the consultation responses received, and prepared a final Draft TLP, which confirms the proposed site allocations and policies to meet the identified needs of the Traveller communities in the Borough.

Comments are now invited on the content of this Submission Plan and the Integrated Impact Assessment (IIA).

The supporting documentation which can also be viewed, includes the following:

- Consultation Statement
- Duty to Cooperate Compliance Statement
- Capacity Assessment
- Traveller Needs Technical Note (ArC4)
- Site Selection Topic Paper
- Exceptional Circumstances Topic Paper

How can I respond to this consultation?

In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, representations are invited on the proposed submission draft of the Traveller Local Plan 2020 -2041 (Submission Draft) and the IIA (noting the supporting documentation), which are available to view and download from:

<https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan-regulation-19>

This latest consultation will run for a 6-week period from 24 September 2025 until 5pm on Wednesday 5th November. All comments must be received by **5pm on Wednesday 5th November 2025**.

Views unrelated to this Submission Draft consultation, including political opinions, defamatory, offensive or discriminatory remarks, or sensitive personal information, should not be included in the responses. Please note that any responses considered to fall into these categories will be considered inappropriate and will not be taken into account or included as part of this consultation.

Comments should be submitted via the Objective consultation Platform (also known as a Key Plan), or via a representation form which can be downloaded from the above website.

If you have any queries regarding this Submission Plan, or would like assistance in completing a response, please contact a member of the Plan Making Team at Travellerlocalplan@enfield.gov.uk or by calling 020 8379 3866.

The public consultation on this Submission Plan allows interested parties to comment on the Traveller Local Plan and the supporting information before it is submitted to the Secretary of State for Examination.

As such, the Council is seeking representations on behalf of the Secretary of State for Levelling Up, Housing and Communities on legal compliance, compliance with the Duty to Cooperate and the four tests of soundness. The tests of soundness are whether the plan is:

- Positively prepared – providing a strategy which as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and is based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF. Further information on how your personal data will be used is given in the privacy notice. Non personal data may be published on this website in due course. More information can be found here:
<https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#privacy-notice-for-the-enfield-local-plan>

At the point of publication of this Submission Draft Plan, the Enfield Local Plan (ELP) is currently at examination. More information about this process can be found at:
<https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

For the purpose of the Submission Draft TLP, assumptions have needed to be made about the likely content of the ELP upon adoption. Figure 2 (see page 10, below) shows the documents that currently make up the development framework for the Borough, and this Figure will need to be updated upon adoption of the ELP and TLP (with the ELP proposed to supersede the Core Strategy, Development Management Document and Area Action Plans). This Submission TLP assumes that ELP policies H10 (Traveller Accommodation), PL10 (Chase Park) and PL11 (Crews Hill) will be found “sound” (albeit that the Inspector presiding over the ELP examination is very likely to be recommending modifications to these policies). Depending upon the nature and extent of any changes recommended to ELP policies H10, PL10 and PL11, appropriate amendments may need to be made to the Submission TLP ahead of formal submission of the Plan for independent examination.

Foreword

As Leader of Enfield Council, I am proud to introduce our Traveller Local Plan. It forms an essential part of our commitment to building a fairer, more inclusive borough for all.

This Plan is being produced to ensure that the accommodation needs of Gypsies, Travellers, and Travelling Showpeople are properly understood and met up to the year 2041. These communities have long been part of Enfield's social and cultural fabric, and it is our duty to plan for their future with the same care and consideration we extend to all our residents.

The Traveller Local Plan is not just a statutory requirement, it is a reflection of our values. It supports our wider Local Plan by promoting equality, sustainability, and community cohesion. Through robust evidence, inclusive consultation, and careful site planning, the Plan will help us allocate suitable locations for Traveller accommodation, reduce unauthorised encampments, and improve access to services and opportunities for the site users.

By producing this Plan, we are creating a framework that balances the needs of the Traveller communities with those of the wider borough. It will help us manage growth responsibly, protect the environment, and ensure that all residents, regardless of background, can thrive in a safe, welcoming Enfield.

I encourage everyone to engage with this process. Together, we can shape a borough that truly reflects the diversity and strength of our community.

Cllr Ergin Erbil
Leader of Enfield Council



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1. Introduction

- 1.1. The London Borough of Enfield (LBE), like all Local Planning Authorities, is required by Central Government to assess the accommodation needs of Gypsies and Travellers and develop a deliverable strategy to address these needs. The Traveller Local Plan (TLP) confirms the accommodation needs in the period 2020/21 to 2040/41, identifies sites and locations for meeting the accommodation needs, and provides design guidance to inform planning application proposals and site delivery.

Background

- 1.2. The term 'Travellers' includes a diverse range of people and groups with different histories, cultures and beliefs, including English Romany Gypsies, Irish and Scottish Travellers, European Roma, 'New Age' Travellers, and Travelling Showpeople. For the purposes of this Plan, any reference to 'Travellers' includes Gypsies (including Roma), Travellers and Travelling Showpeople. For ease of reference, a glossary of terms has been made available in Appendix A of this TLP.
- 1.3. LBE recognises that failing to allocate sufficient land to meet the identified needs of Travellers, would negatively impact all communities in the Borough. For example, it would make it harder to resist future speculative planning applications for temporary planning permission, and it would be more challenging to take effective enforcement action against unauthorised encampments. Additionally, it could result in more sites being permitted through the planning appeal process.

TLP Aims and Objectives

- 1.4. The Enfield Local Plan (ELP) sets out the long-term vision for the Borough. It describes Enfield as a place for affordability and accessibility, a place for opportunity and enterprise, a place for diversity and equality, and a place that delivers. The vision for the Borough stands for all communities and as such a separate vision for this TLP is not considered necessary. The TLP does, however, set out specific aims and objectives, which have helped to guide the preparation of the TLP, and can be used to help monitor the effectiveness of the TLP.
- 1.5. The aims for the TLP are as follows:
 - To provide a sufficient mix of, and type of, sustainable and high-quality sites, to fully meet the assessed accommodation needs of the Traveller communities, as defined within the Planning Policy for Traveller Sites (PPTS, 2024)¹.
 - To provide Traveller sites that are located in areas that are not at risk of flooding and have adequate access to public transport and community facilities (including schools, health centres and shops).
 - To reduce the number of unauthorised developments and encampments and increase integration between the Traveller communities and the settled communities.
 - To protect and enhance the special built and natural character of the Borough, including its countryside, open spaces, Green Belt, and historic environment.
 - To promote climate-resilient and sustainable building design by encouraging energy-efficient layouts, the use of low-carbon and recycled materials, and the integration of green infrastructure to reduce environmental impact and manage extreme weather.

¹ <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>

- To use land efficiently by avoiding development on high-quality agricultural land, prioritising brownfield sites where possible, and supporting sustainable waste management through minimisation, reuse, and recycling.
- To protect water resources by maintaining water quality, ensuring adequate sewerage infrastructure, and using Sustainable Drainage Systems (SuDS) to manage surface water runoff and support biodiversity.

1.6. The objectives for the TLP flow from the aims set out above, and have been informed by the evidence base for the TLP, as described in Section 3. The TLP objectives are as follows:

- To enable the delivery of at least 30 permanent Traveller pitches, and permanent stopover provision capable of accommodating at least 15 caravans at one time.
- To ensure sites will be delivered in sustainable, suitable and safe locations within Enfield, with high quality on-site provision specifically designed for Gypsy and Traveller use, and with good access to facilities and services.
- To provide a clear framework for making decisions on future planning applications for Traveller sites within the Borough.

The Plan Making Process

- 1.7. The TLP has been prepared within the context of a hierarchical framework of planning legislation and policy for England. At the top of the hierarchy are a number of planning related Acts of Parliament and Statutory Instruments, and the National Planning Policy Framework (NPPF), which sets out Government's planning policies for England and how these should be applied.
- 1.8. Local planning authorities must take the NPPF into account when preparing Local Plans (including this Traveller Local Plan). This means that the Council should follow national policy unless there is local evidence and circumstances that would justify a different approach.
- 1.9. Beneath national policy is the London Plan, which is prepared by the Mayor of London. The Greater London Authority (GLA) Act 1999 requires Local Plans to be in 'general conformity' with the London Plan. This means that the Local Plan should be generally in line with the London Plan, unless there is local evidence and circumstances that would justify a different approach. The London Plan forms part of the development plan for the Borough and provides the spatial development strategy for Greater London. It was published on 2nd March 2021.
- 1.10. In preparing the TLP the Council has also followed the processes outlined in the Town and Country (Local Planning) (England) Regulations 2012. A summary of the process is set out in Figure 1 below.

Figure 1: Summary of the Plan-making Process

September 2023	September 2024	September 2025	2026
Consultation on TLP Issues and Options under Regulation 18.	Consultation on Draft TLP, including proposed policies and site allocations under Regulation 18.	Proposed submission consultation (Regulation 19). Formal representations are invited on the draft TLP to be submitted for examination. CURRENT STAGE	Submission of TLP and representations to the Secretary of State (Regulation 22). Examination by independent Inspector and public hearings (Regulations 22-24). Publication of Inspector's Report and recommendations to make the TLP "sound" (Regulation 25). Adoption of TLP (Regulation 26) ² .

- 1.11. In Autumn 2023, the Council consulted on an [Issues and Options](#) consultation document under regulation 18³, which outlined the purposes of the TLP, explained the plan-making process and presented a series of options for addressing the accommodation needs of the Traveller communities in the Borough. The main issues focused around how to meet the identified need, the potential locations for new Traveller sites, site size, site design, and how the new sites should be managed.
- 1.12. In autumn 2024 the Council consulted on a [Draft TLP](#), again under Regulation 18, which explained the limited range of available site options and the robust methodology used to assess sites, before setting out the proposed allocations and draft policies.
- 1.13. The Consultation Statement published alongside this Submission Plan explains how previous consultation was undertaken, and summarises the responses received. It also provides an overview of some of the decisions made around the preferred options in terms of sites and policy wording.

Relationship with Other Plans and Strategies

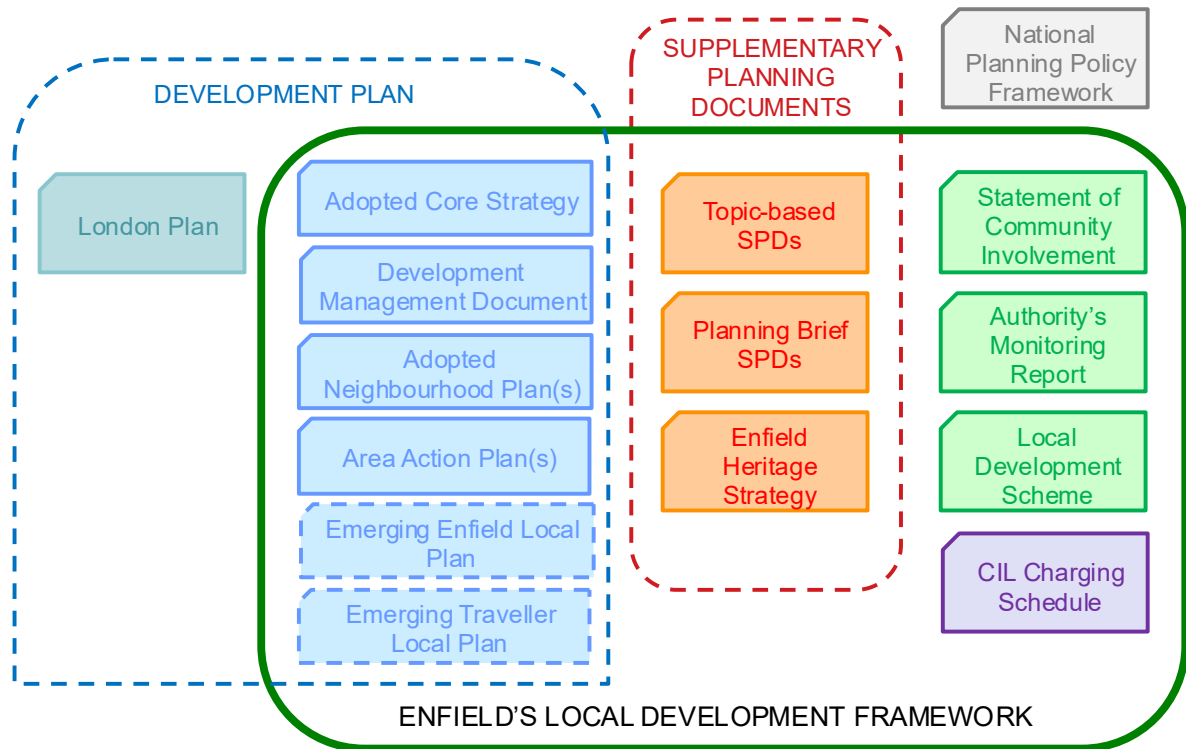
- 1.14. The TLP must be read in conjunction with the Enfield Local Plan (ELP), other Development Plan Documents, and Supplementary Planning Documents.
- 1.15. Draft ELP Policy H10: Traveller Accommodation, establishes the level of need for traveller accommodation in the period to 2041, commits the Council to preparing a Traveller Local Plan, and provides high-level design guidance. The TLP provides more detail on the needs for traveller accommodation, allocates sites to meet the identified needs (including addressing the existing shortfall, and ensuring a 5-year supply of

² At this point the TLP is formally adopted and becomes part of the statutory development plan (carrying full weight in the in the determination of planning applications).

³ The Town and Country Planning (Local Plan) (England) Regulations 2012 - <https://www.legislation.gov.uk/ukxi/2012/767/regulation/18>

deliverable sites), and confirms the broad locations for meeting traveller needs later in the Plan period. The TLP also provides more detailed guidance on traveller site design.

Figure 2: Enfield's Current Development Framework



1.16. The TLP sets out how LBE will meet the future accommodation needs of the Travelling communities. The TLP forms part of the Development Plan for Enfield (see Figure 2 above), alongside the London Plan (2021), the North London Waste Plan (2022), the Hadley Wood Neighbourhood Plan (2023), and the new Enfield Local Plan (2026)⁴. The TLP policies apply to the whole of the Borough of Enfield.

Duty to Co-operate (DtC)

1.17. Section 110 of the Localism Act (2011), subsequent regulations and the NPPF, impose a legal obligation on local planning authorities to cooperate with each other, and other bodies, when formulating policies related to strategic matters and on areas of common interest. It is important to emphasise that the duty to cooperate is an ongoing process that involves reviewing policies, their rationale, and their potential effects on neighbouring authorities and organisations. The duty remains relevant at all stages of the plan-making process.

1.18. A Duty to Cooperate Compliance Statement is provided alongside this Submission TLP. This statement details the bodies engaged under the Duty throughout the ELP's

⁴ Assumption that the ELP will be adopted in 2026.

preparation, the strategic issues that were addressed, and the outcomes that influenced policy formulation.

- 1.19. All adjoining authorities have been contacted to establish whether they are in a position to assist Enfield in meeting their Traveller accommodation needs. To date, none have confirmed that they would be able to assist in meeting Enfield's need for traveller pitches/ transit provision, and similarly, Enfield has confirmed to adjoining authorities that it is not able to assist in meeting their needs for Traveller accommodation.

2. Planning Policy and Evidence

- 2.1. A range of policy, guidance and evidence base work has informed preparation of the TLP. In summary:

Planning Policy for Traveller Sites (PPTS)

- 2.2. This document sets out the government's planning policy for traveller sites.
- 2.3. In December 2023, the Government announced that it was reverting to the 2015 PPTS 'nomadic habit of life' definition, in light of the Government's reversion to the 2012 definition following the Lisa Smith Court of Appeal judgement in 2023. The updated definition for Gypsies and Travellers is set out within Appendix 1 of this Submission Plan.
- 2.4. For the purposes of this Submission Plan, Gypsies and Travellers live on pitches within sites, whilst Travelling Showpeople live on plots within yards.
- 2.5. Policy B of the PPTS requires local planning authorities, when preparing Traveller Local Plans, to:
- a) identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and
 - b) identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15

Enfield GTANA

- 2.6. The evidence of need within the Borough derives from the Gypsy and Traveller Accommodation Needs Assessment (GTANA) undertaken by specialist consultants Arc4 in 2020, which was later updated in 2024. The updated assessment includes 2021 Census data and removes reference to the 2015 PPTS 'nomadic habit of life' definition.

London-wide GTANA

- 2.7. In addition to the Enfield GTANA (2024), the Greater London Authority (GLA) has commissioned a London-wide GTANA. This study is currently underway, with findings expected to be published later in 2025. The London Borough of Enfield is working closely with the GLA on this assessment. The needs identified in the London-wide assessment are anticipated to closely align with those in Enfield's updated GTANA (2024).

Enfield Local Plan

- 2.8. The ELP sets out the amount and types of new development required in the Borough to meet the needs of local residents and businesses and allocates sites to accommodate this growth. It also includes a range of policies and guidance to manage the form and quality of new development.
- 2.9. ELP Policy H10: Traveller Accommodation, sets out LBE's strategic commitment to meeting the identified Traveller accommodation needs through a separate TLP. Policy H10 also sets out a series of broad assessment criteria against which proposals for

transit pitch provision, permanent pitch provision and plots for Travelling Showpeople will be assessed alongside the policies set out within this TLP.

- 2.10. The criteria in ELP Policy H10 that relate to the suitability of a site for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople (criterion a, b, c, d, and e) will only apply to sites that are not allocated in the TLP. This is because the principle of development on sites allocated in the TLP has already been established following detailed assessment of the sites, as part of the process of preparing the TLP.
- 2.11. Criterion f and g of Policy H10 will apply to all traveller site proposals irrespective of whether or not a site is allocated in the TLP. This is because all proposals aimed at meeting Traveller accommodation needs should ensure the development is appropriately integrated with its setting, and that provision is made for on-site utilities.

3. Enfield’s Traveller Needs

Gypsy and Traveller pitch requirements

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

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

Period	Pitch need	Annualised need
Authorised Pitch Shortfall (2020/21 to 2024/25) (A)	16	3.2
Longer-term need		
Over period 2025/26 to 2029/30 (B)	3	0.6
Over period 2030/31 to 2034/35(C)	4	0.8
Over period 2035/36 to 2040/41 (D)	7	1.4
Longer-term need TOTAL to 2040/41 (21 years) E=(B+C+D)	14	
NET SHORTFALL 2020/21 to 2040/41 (A+E) (26 years)	30	

Source: Table ES1 GTAA 2024

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

Transit provision

- 3.6. Based on evidence from the 2024 GTANA and the ongoing need for transit provision, there is a need for land to accommodate permanent stopover location(s) for at least 15 caravans at one time. The GTANA (2024) suggests that this need could be met through the establishment of a transit site or designated stopover location(s) identified

by the local authority. The Council already has an effective negotiated stopping policy in place, and therefore to best address the needs identified within the GTANA (2024), the TLP proposes the allocation of a transit site within the Borough, which can accommodate at least 15 caravans at one time.

Travelling Showpeople plot requirements

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

Summary of Need

- 3.8. In summary, the Submitted Plan seeks to allocate the following types of sites:

Table 2: Summary of overall site requirements in Enfield

Site type	Site Quantity
Permanent shortfall (2020/21 to 2024/25), short-term need (2029/30) and Longer-term need (2030/31 to 2031/32) – to be delivered within the first 5 years of the plan (post adoption)	20 pitches
Remaining Permanent Longer-term need (2032/33 – 2040/41)	10 pitches
Transit need	To allocate at least one site to accommodate a minimum of 15 caravans.
Travelling Showpeople plots	None. No need identified.

- 3.9. In terms of the permanent need, it should be noted that the time periods used in Table 2 differ from those used in the GTANA (and Table 1 above). The time periods used in Table 2 help to differentiate between the number of pitches needed to address the shortfall and demonstrate a 5-year supply at the point of adoption of the TLP, and the remaining longer-term needs (in the period 2032/33 to 2040/41). The time periods used in Table 2 also more closely align with the sites available to meet the permanent pitch needs over the Plan period (with two sites identified to meet the shortfall and 5-year supply requirement of 20 pitches), and a clear strategy for meeting the longer-term need for a further 10 pitches in the period to 2041.

4. Site Allocations

- 4.1. The TLP is committed to facilitating the delivery of accommodation to meet the needs of the Travelling community. One of the key responsibilities of the TLP is to determine the quantity, distribution and type of new sites to be provided.
- 4.2. Having established the need to provide for 30 permanent Traveller pitches and at least one new transit site with a capacity to accommodate a minimum of 15 caravans, the Council explored all the available options for meeting these identified needs.
- 4.3. As there are currently no existing permanent or transit sites within the Borough, the Council did not have the option to consider expanding or refurbishing any existing facilities. Adjoining authorities have been and will continue to be approached under the Duty to Co-operate, but none have confirmed that they are able to assist in meeting Enfield's Traveller Accommodation needs. After several 'call for sites', only Council owned land was put forward for consideration. All suitable Council owned land has been considered as part of this plan-making process, as well as each of the ELP strategic Placemaking Areas. The full analysis of this process is set out within the associated Site Selection Topic Paper.
- 4.4. The Council has determined that, to meet the identified Traveller needs in the Borough, it will be necessary to remove two small parcels of land from the Green Belt to meet the short-term permanent pitch requirement. Additionally, a further small parcel of land will need to be de-designated from the Borough's Metropolitan Open Land (MOL) area, to meet the need for a transit site.
- 4.5. To remove land from the Green Belt and de-designate MOL the Council must demonstrate exceptional circumstances. The Council has set out the exceptional circumstances in an Exceptional Circumstances Topic Paper, which demonstrates how it has examined fully all other reasonable options before proposing to remove two small parcels of land from the Green Belt and de-designate a small area of MOL (which currently accommodates a skate park facility, some hard-standing and a disused public toilet building).
- 4.6. To better understand the capacity of the sites proposed for allocation, the Council commissioned a Capacity Assessment (August 2025). This assessment provides a robust initial evaluation of the capacities of the three sites proposed for allocation in the TLP with a strong emphasis on sustainable design, safety, and integration of the sites within their surrounding context. It recommends further investigative work, such as tree surveys and utility assessments, to refine the proposals in advance of any planning applications.
- 4.7. The findings of this Assessment have also informed Policy TLP2 below and the site proformas set out in Appendix B. These proformas (which carry the weight of policy), outline the required site features, including amenity buildings, green space, and specific design standards such as minimum separation distances for fire safety.
- 4.8. The sites allocated to meet the identified need are as follows:

Bulls Cross Nursery (Site 1)
- 4.9. Bulls Cross will accommodate permanent Traveller provision and deliver at least 8 pitches. This will contribute towards meeting some of the shortfall (2020/21 to

2024/25), short-term need (2029/30) and some of the longer-term need (2030/31 to 2031/32). The site is needed to ensure of 5-year supply from the date of adoption of the TLP.

- 4.10. The site, which is owned by the Council, is currently vacant. It was formerly used as a plant nursery and comprises a relatively flat grassed area with some sections of hard standing. Covering a total area of approximately 0.479 hectares, the site benefits from both pedestrian and vehicular access directly from Bulls Cross. It also enjoys relatively good connectivity to public transport, and it is located within Flood Zone 1 (lowest risk of flooding).
- 4.11. The surrounding context includes playing fields to the north associated with Orchardside School, while to the east and south lie football pitches used by the Old Ignatian Football Club. To the west is Myddelton House, a Grade II Registered Park and Garden, which also contains several Grade II listed buildings. The site is situated within the Green Belt and falls within the Forty Hill Conservation Area. Additionally, it is designated as an Archaeological Priority Area.



Site 1 aerial view.



Site 1 entrance from Bulls Cross.

Land adjacent to Ridgeway (Site 2)

- 4.12. Land Adjacent to Ridgeway will accommodate permanent Traveller provision and deliver at least 12 pitches. This will contribute towards meeting some of the shortfall (2020/21 to 2024/25), short-term need (2029/30) and some of the longer-term need (2030/31 to 2031/32). The site is needed to ensure of 5-year supply from the date of adoption of the TLP.
- 4.13. The site, currently vacant and under Council ownership, comprises a relatively flat, grassed area enclosed by mature vegetation that provides natural screening on all sides. There are no existing buildings or structures on the site. Triangular in shape, it is accessed via a gate on the eastern boundary and via an access road to the north of the site. The total site area is approximately 1.09 hectares.
- 4.14. Access to the site is available for both pedestrians and vehicles via The Ridgeway, where a bus stop is conveniently located at the entrance. A small cluster of residential properties lies to the east, also off The Ridgeway. The site is bordered by agricultural land to the north, west, and south, with St John's Prep and Senior School situated further to the east. It is located within the Green Belt and, while there are no known heritage constraints, it is designated as an Archaeological Priority Area. The site is within Flood Zone 1 (lowest risk of flooding).



Site 2 aerial view



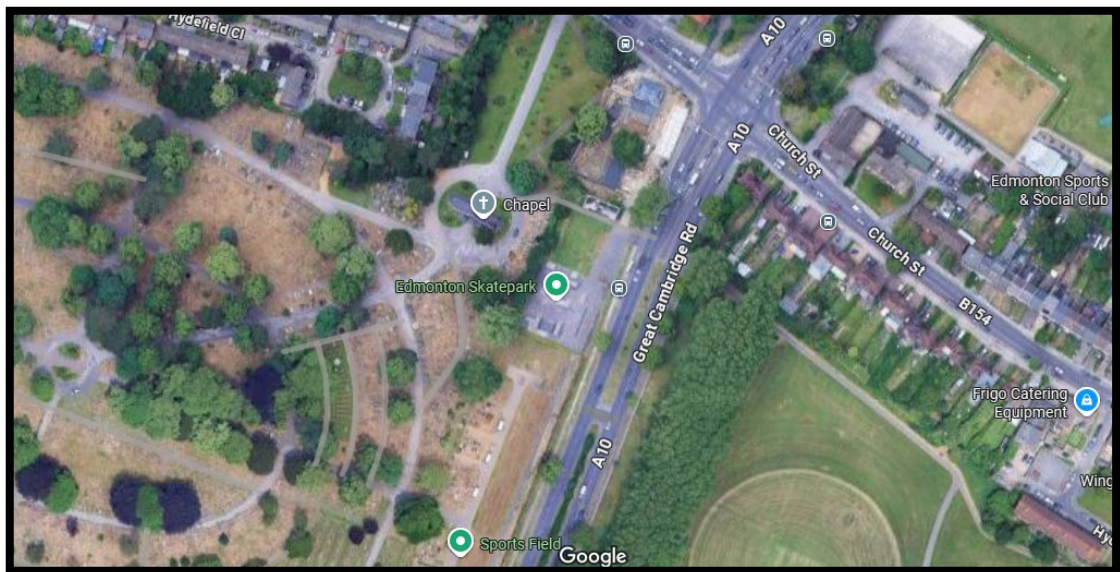
Site 2 current entrance

Land at A10 (Site 3)

- 4.15. Land at A10 will accommodate transit Traveller provision and deliver a site which is capable of accommodating at least 15 caravans (and their associated vehicles) at any one time.
- 4.16. The site is within the Council's ownership and is partly vacant, and partly used as a public Skate Park. The site, measuring approximately 0.31 hectares, is currently gated and features two distinct areas. The eastern section comprises flat hard standing and

includes a disused but structurally sound toilet block. The western portion is occupied by Edmonton Skatepark.

- 4.17. A public footpath runs through the site towards Edmonton Cemetery to the northwest. The site is bounded to the east by the A10, with a low wall along this edge providing a defensible boundary. To the southeast lies Edmonton Sports Field, while a sports pavilion is located directly across the A10.
- 4.18. The site benefits from both pedestrian and vehicular access, with a bus stop situated at the entrance. The site is within Flood Zone 1 (lowest risk of flooding).. The site is designated as Metropolitan Open Land (MOL) and lies in close proximity to the locally listed Edmonton Cemetery and Cemetery House.



Site 3 aerial view



Site 3 entrance

Chase Park and Crews Hill

- 4.19. The Enfield Local Plan (ELP) promotes a new settlement at Crews Hill and a large urban extension at Chase Park. There is capacity to deliver at least 10 permanent pitches within these placemaking areas, addressing the remainder of the longer-term need (2032/33 to 2040/41).
- 4.20. Crews Hill is identified in the emerging ELP as a key placemaking area (PL11). It covers an area of approximately 286 hectares, centered around the existing train station. There is currently a varied range of land uses across the placemaking area, including garden centres, plant nurseries, a small residential cul-de-sac and detached houses, agricultural land, a golf course and a designated waste site. The vision for the placemaking area is to create a distinctive and sustainable new neighbourhood, comprising of approximately 5,500 homes in total, together with a mix of other uses providing local services and facilities and benefiting from enhanced transport connectivity and access to green infrastructure.
- 4.21. Chase Park is identified in the emerging ELP as a key placemaking area (PL10). It covers an area of approximately 166 hectares, with agricultural land to the north, a golf course to the west, and suburban residential development to the south. Within the placemaking area, much of the land is currently in agricultural or equestrian use, with several brooks crossing the site. The vision for the placemaking area is to create a distinctive, sustainable and healthy new neighbourhood, comprising of approximately 3,700 homes in total, together with new facilities and services, enhanced transport connectivity and new green and blue infrastructure.
- 4.22. ELP Policies PL10: Chase Park, and PL11: Crews Hill, require the preparation of comprehensive masterplans to guide future development within these placemaking areas. The masterplanning processes will identify land suitable for pitch provision within each placemaking area, as well as setting out the specific design principles for the identified sites. Upon completion of this work (including any associated viability testing), the Council will determine (via a decision at Full Council) which placemaking area is most appropriate to deliver the 10 permanent pitches required to meet the remaining longer-term need.
- 4.23. The factors that will be taken into account in making the above decision will include the needs of traveller families at the time, the preferred locations for pitch provision within each of the placemaking areas at Crews Hill and Chase Park, and the likely timescales for delivery.
- 4.24. Policy TLP1 identifies the site allocations, and in terms of the Crews Hill and Chase Park placemaking areas, the broad locations, for meeting Traveller needs in the Borough in the period 2020-2041. This Policy should be read alongside the Site Proformas at Appendix B of this TLP. The proformas carry the weight of policy, but the related mapping is provided for illustrative purposes only.

POLICY TLP1:**Sites for Travellers**

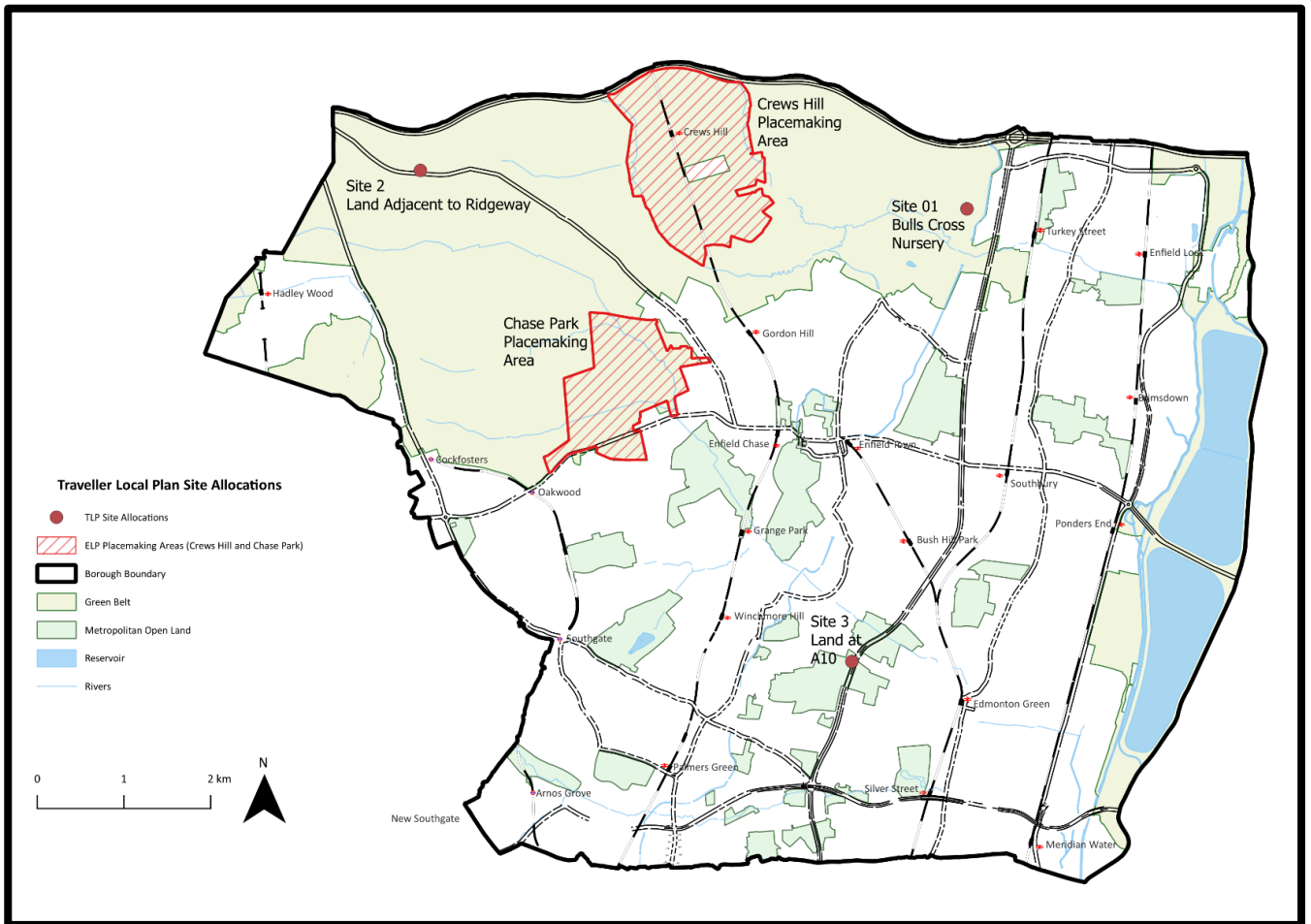
1. The TLP will facilitate the delivery of a minimum of 30 permanent traveller pitches, and 1 transit site (to accommodate a minimum of 15 caravans) in the Plan period 2020/21 – 2040/41.
2. The sites set out in Table A are allocated for traveller use to meet the identified shortfall and ensure a 5-year supply of deliverable sites. Further information on these site allocations is set out on the proformas at Appendix B. The proformas carry the status of policy and indicate the key design and delivery requirements for each allocation.

Table A: List of sites to be allocated to meet the identified shortfall and 5-year supply of deliverable sites.

Site Allocation	Site address	Proposed use	Required capacity
Site 1: Bullscross Nursery	Bulls Cross Nursery, Bulls Cross, Enfield (EN1 4RJ)	Permanent provision (first 5 years)	Minimum of 8 pitches
Site 2: Land adjacent to the Ridgeway	Land Adjacent to Ridgeway (EN2 8AE)	Permanent provision (first 5 years)	Minimum of 12 pitches
Site 3: Land at A10	Land at A10, (N21 2PS)	Transit provision	Minimum of 15 caravans

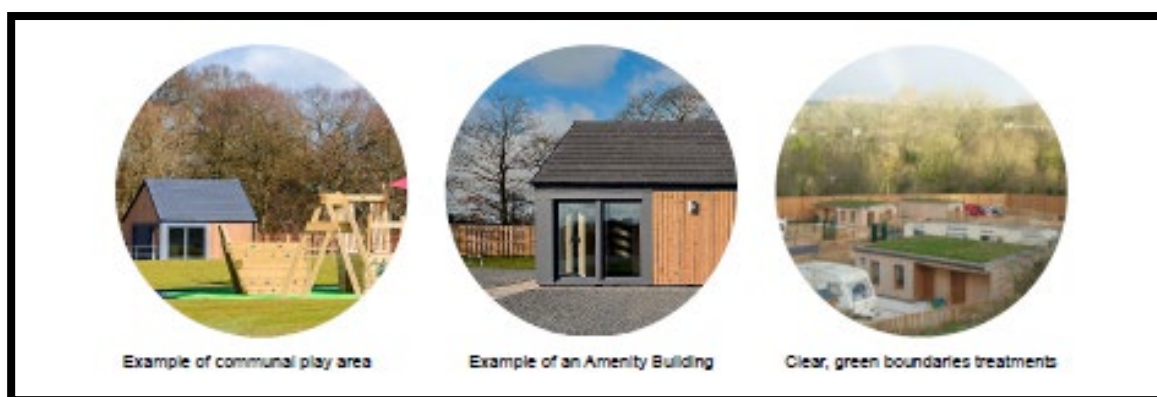
3. The sites allocated to meet traveller needs are defined on the Policies Map (and are shown illustratively on Map A below).
4. The longer-term need for permanent pitches (in the period 2032/33 – 2040/41) will be met within either the Chase Park placemaking area or the Crews Hill placemaking area. The 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.
5. The criteria within ELP Policy H10 (Traveller Accommodation), should be applied alongside Policy T1 and Policy T2 for Traveller site proposals on sites allocated within the TLP or coming forward as windfall / speculative planning applications.

Map A: Map of Allocated Sites within the TLP



5. Design of New Traveller Sites

- 5.1. Good design is a key aspect of sustainable development. Although there is limited guidance on the design of new Traveller sites, paragraph 26 of the Planning Policy for Traveller Sites (PPTS) states that sites should be well planned or soft landscaped to positively enhance the environment and increase its openness, with adequate landscaping and play areas for children. It advises against enclosing sites with hard landscaping, high walls or fences.
- 5.2. Detailed guidance was given in 'Designing Gypsy and Traveller Sites' (DCLG, 2008)⁵ although this document was withdrawn in 2015. Nonetheless, it contains useful material on site layout, access and orientation of both permanent and transit sites, as well as site services and facilities. For example, it is essential that each pitch has an amenity building with access to mains water, electricity, a toilet/bathroom, a kitchen and a dining area. It is also important that sites provide visual and acoustic privacy for both people living on the site and those living nearby.
- 5.3. 'Places we're proud of'⁶ is a short guide to providing and managing sites for Gypsies and Travellers. It explains why high-quality sites are needed, highlights key success factors, and provides examples of good site design in practice.
- 5.4. The requirements of Policy TLP2 below apply in addition to the site-specific requirements set out in Policy TLP1 above, and the associated Site Proformas in Appendix B.
- 5.5. Any planning applications granted for Traveller Sites will have a planning condition attached to control uses on the site. The planning condition will state that no vehicle over 5 tonnes shall be stationed, parked or stored on site, and commercial activities cannot take place on the land, (including the storage and sorting of materials). The 5 tonnes vehicle weight limit will not apply to sites travelling showpersons.



Good practice examples of expected design

⁵ <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>

⁶ <https://www.gypsy-traveller.org/resource/national-policy-advisory-panel-places-were-proud-of/>

POLICY TLP2:	Design and Site Layout
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Planning applications for traveller sites must comply with the following requirements, in so far as they are relevant to the site and its context:

Inclusive Design

1. Demonstrate effective engagement with the Gypsy and Traveller community during the design process
2. Demonstrate that the proposed site layout is accessible and adaptable to suit users including disabled people, older people and families with young children.
3. Promote social integration between all communities through culturally appropriate design, considering the use of shared spaces where appropriate and achievable.

Safety, Access and Parking

4. Ensure the proposed site layout allows for a minimum of 6m separation distances between caravans on different pitches to help minimise fire risk.
5. Provide safe vehicle and pedestrian access from the site to the highway, and ensure that within the site, potential conflicts between pedestrians and vehicles are minimised.
6. Explore opportunities to improve existing walking and cycling routes to encourage sustainable forms of travel.
7. Ensure that there is sufficient turning space within the site to allow for safe vehicular movement.

Environmental Considerations

8. Utilise and enhance existing boundaries where feasible and avoid any new boundary treatment that has a detrimental visual impact on the character of the site and locality.
9. Provide 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;
10. Include communal green space with provision for children's play space, which should be in an overlooked area
11. Incorporate energy efficient design to help reduce carbon emissions and ensure resilience to the effects of climate change.
12. Embed noise mitigation measures into the site design.
13. Ensure that the site and the layout proposed on it, would not cause harm to the significance or setting of heritage assets or biodiversity interests (such as priority habitats or Sites for Nature Conservation), and should take opportunities to protect and enhance such assets and interests.
14. Provide mitigation measures to reduce the risk of surface water flooding.

Utilities and Services

15. Include a communal building/ site manager's office.
16. Provide wastewater infrastructure and surface water drainage incorporating SUDS (where feasible)
17. Protect water quality through the careful siting of pitches. The proximity of water bodies, watercourses and Source Protection Zones should be considered when locating and constructing any associated amenity buildings.

18. Provide appropriate space for waste storage and disposal and collection.
19. Minimise external lighting to avoid a detrimental impact on the surrounding locality.

Use Specific Requirements

Additionally:

All permanent pitches must include:

- Space for touring caravan, mobile home and 2no. cars
- A private garden to rear of each pitch.
- Storage space and amenity building with living room, kitchen, WC.
- Green borders demarcating plots

All transit pitches must include:

- Space for 2 touring caravans, a mobile home and parking for 2no. cars
- A utility building with W/C, utility room, kitchen and living room

All Travelling Showpeople yards must include:

- Adequate space for storage and maintenance of vehicles and equipment.

6. Implementation and Monitoring

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

Appendix A: Definitions

Caravans:

Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.

DCLG:

Department for Communities and Local Government; created in May 2006. Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (O.D.P.M.).

Gypsies and Travellers:

Defined by DLUHC Planning policy for traveller sites (December 2023) as:

“Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.”

The planning policy goes on to state that:

“In determining whether persons are “gypsies and travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a. whether they previously led a nomadic habit of life*
- b. the reasons for ceasing their nomadic habit of life*
- c. whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.”*

Irish Traveller:

Member of one of the main groups of Gypsies and Travellers in England. Irish Travellers have a distinct indigenous origin in Ireland and have been in England since the mid nineteenth century. They have been recognised as an ethnic group since August 2000 in England and Wales (O’Leary v Allied Domecq).

Mobile home:

Legally a ‘caravan’ but not usually capable of being moved by towing.

Negotiated Stopping:

Negotiated stopping is a balanced and humane approach to managing roadside camps, based on a mutual agreement between the local authority and Gypsy and Traveller families on what short term accommodation is appropriate, fair and in the best interests of all residents.

Pitch:

Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. DLUHC Planning policy for traveller sites (December 2023) states that “For the purposes of this planning policy, “pitch”

means a pitch on a “Gypsy and Traveller” site and “plot” means a pitch on a “travelling showpeople” site (often called a “yard”). This terminology differentiates between residential pitches for “Gypsies and Travellers” and mixed-use plots for “travelling showpeople”, which may / will need to incorporate space or to be split to allow for the storage of equipment”.

Plot:

See “Pitch” above.

PPTS:

Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions)

Roadside:

Term used here to indicate families on unauthorised encampments, whether literally on the roadside or on other locations such as fields, car parks or other open spaces.

Romany:

Member of one of the main groups of Gypsies and Travellers in England. Romany Gypsies trace their ethnic origin back to migrations, probably from India, taking place at intervals since before 1500. Gypsies have been a recognised ethnic group for the purposes of British race relations legislation since 1988 (CRE V Dutton).

Sheds:

On most residential Gypsy/Traveller sites 'shed' refers to a small basic building with plumbing amenities (bath/shower, WC, sink), which are provided at the rate of one per pitch/pitch. Some contain a cooker and basic kitchen facilities.

Site:

An area of land laid out and used for Gypsy/Traveller caravans; often though not always comprising slabs and amenity blocks or ‘sheds’. An authorised site will have planning permission. An unauthorised development lacks planning permission.

Slab:

An area of concrete or tarmac on sites allocated to a household for the parking of trailers (caravans).

Stopping places:

A term used to denote an unauthorised temporary camping area tolerated by local authorities, used by Gypsies and Travellers for short-term encampments, and sometimes with the provision of temporary toilet facilities, water supplies and refuse collection services.

Trailers:

Term used for mobile living vehicles used by Gypsies and Travellers; also referred to as caravans.

Transit site:

A site intended for short-term use while in transit. The site is usually permanent and authorised, but there is a limit on the length of time residents can stay.

Travelling Showpeople:

Defined by DLUHC Planning policy for traveller sites (December 2023) as “Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependent’s more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.”

Unauthorised development:

Establishment of Gypsy and Traveller sites without planning permission, usually on land owned by those establishing the site. Unauthorised development may involve ground works for roadways and hard standings. People parking caravans on their own land without planning permission are not unauthorised encampments in that they cannot trespass on their own land – they are therefore unauthorised developments and enforcement is always dealt with by Local Planning Authorities enforcing planning legislation.

Unauthorised encampment:

Land where Gypsies or Travellers reside in vehicles or tents without permission. Unauthorised encampments can occur in a variety of locations (roadside, car parks, parks, fields, etc.) and constitute trespass. The 1994 Criminal Justice and Public Order Act made it a criminal offence to camp on land without the owner’s consent. Unauthorised encampments fall into two main categories: those on land owned by local authorities and those on privately owned land. It is up to the landowner to take enforcement action in conjunction with the Police.

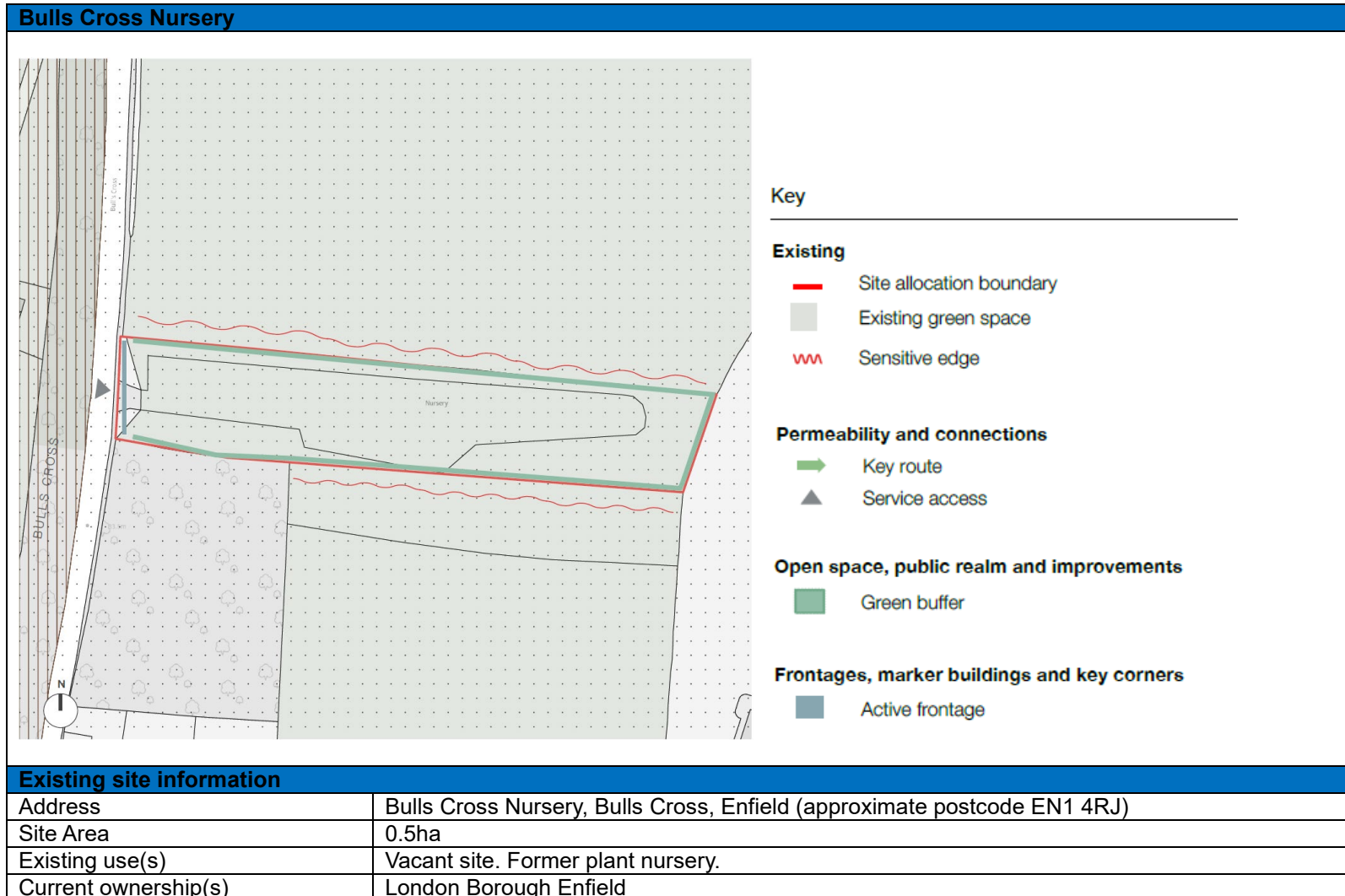
Wagons:

This is the preferred term for the vehicles used for accommodation by Showpeople.

Yards:

Showpeople travel in connection with their work and therefore live, almost universally, in wagons. During the winter months these are parked up in what was traditionally known as ‘winter quarters’. These ‘yards’ are now often occupied all year around by some family members.

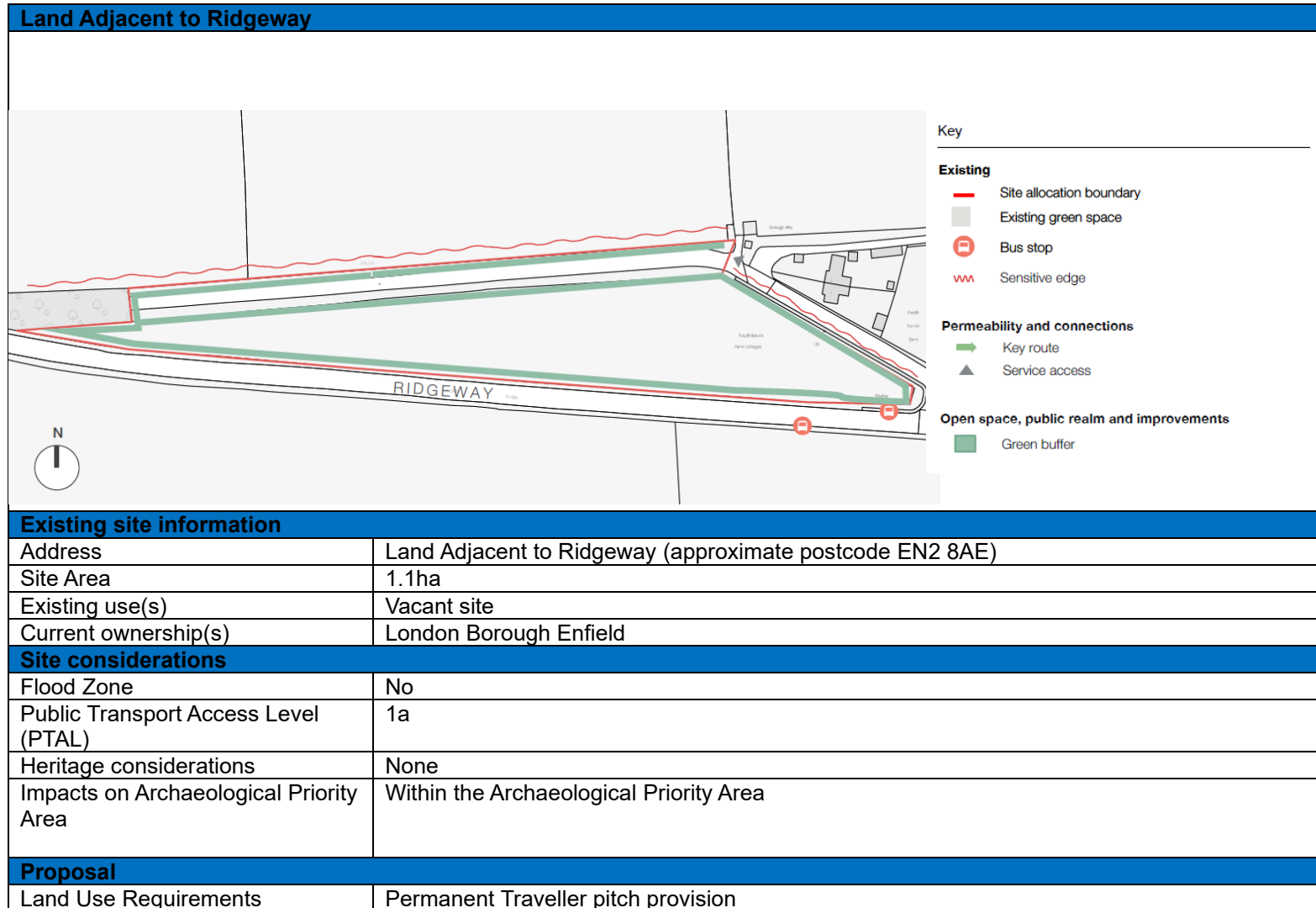
Appendix B – Site Allocation Proforma: Site 1



Site considerations			
Flood Zone	No		
Public Transport Access Level (PTAL)	0		
Heritage considerations	Site sits within the Forty Hill conservation area and opposite Myddelton House Grade II Registered Park and Garden (which includes a number of Grade II listed buildings). Forty Hall lies approximately 900m to the southwest and is Grade 1 listed. There are also individually listed properties to the north (off Bulls Cross) and to the south (off Turkey Street).		
Impacts on Archaeological Priority Area	Within an Archaeological Priority Area		
Proposal			
Land Use Requirements	Permanent Traveller pitch provision		
Implementation			
Timeframe(years)	0-5 (2020/21 – 2025/26)	5-10 (2026/27 – 2030/31)	10+ (2031/32 – 2041/41)
Expected minimum pitch capacity	8		
Proposal			
Delivery requirements	Provide a minimum of 8 permanent pitches to meet the Traveller family needs identified in the Enfield 2024 GTANA.		
Site Specific Design Principles	<p>Development of the site must:</p> <ul style="list-style-type: none"> • Be informed by a Tree Survey, with the layout of development maximising the retention of existing trees and minimising the impact on the retained trees (within and adjoining the site). • Enable all vehicles (including emergency vehicles) to safely access and manoeuvre within site (demonstrated using tracking/ swept path analysis). • Retain and/ or enhance boundary planting, to ensure views into the site are minimised, helping to protect the privacy of the site's occupants. • Retain the existing railings at the entrance to the site (where feasible), recognising the contribution they make to the character of the street scene. • Demonstrate how it conserves and enhances the historic environment. 		
Anticipated contributions	Contributions as set out within the Recreation Mitigation Strategy ⁷ .		

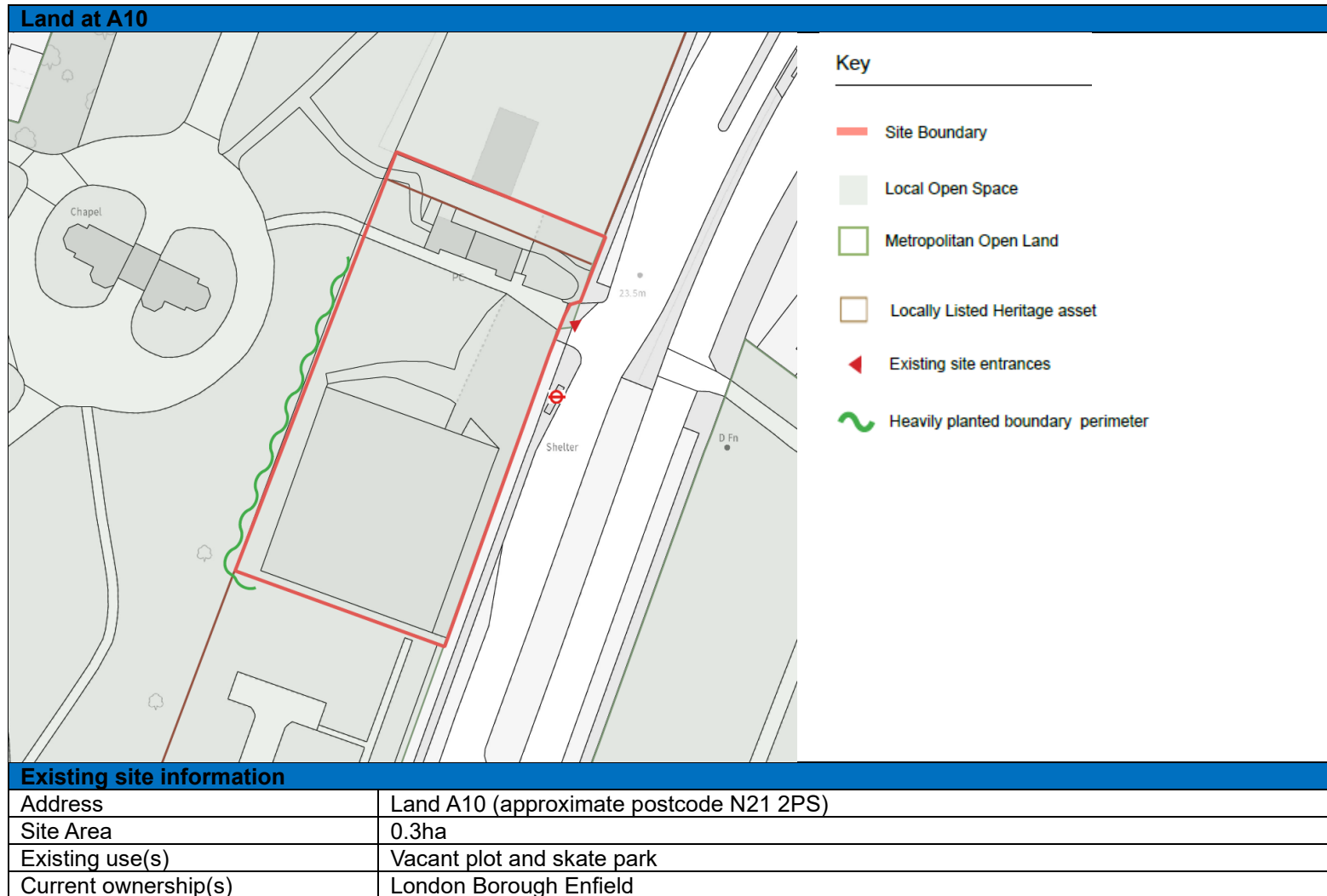
⁷ To help address the recreation pressure on the Epping Forest Special Area of Conservation. See ELP Policy BG3: Protecting Epping Forest Special Area of Conservation.

Appendix B – Site Allocation Proforma: Site 2



Implementation			
Timeframe(years)	0-5 (2020/21 – 2025/26)	5-10 (2026/27 – 2030/31)	10+ (2031/32 – 2041/41)
Approximate Estimated Pitch capacity	12		
Proposal			
Delivery Requirements	Provide a minimum of 12 permanent pitches to meet the Traveller family needs identified in the Enfield 2024 GTANA.		
Design Principles	<p>Development of the site must:</p> <ul style="list-style-type: none"> • Be informed by a Tree Survey, with the layout of development maximising the retention of existing trees and minimising the impact on the retained trees (within and adjoining the site). • Minimise loss of hedgerows and established planting within the site and implement measures to enhance biodiversity on remaining undeveloped parts of the site. • Create a secure entrance to enable all vehicles (including emergency vehicles) to safely access and manoeuvre within site (demonstrated using tracking/ swept path analysis). • Provide safe pedestrian access to the existing bus stops on the Ridgeway. • Retain and enhance the landscape character, with particularly consideration given to views from the South. • Retain and enhance the site's boundary planting to protect the privacy of the site's occupants. 		
Anticipated contributions			

Appendix B – Site Allocation Proforma: Site 3



Site considerations			
Flood Zone	No		
Public Transport Access Level (PTAL)	2		
Heritage considerations	Close to locally listed sites (Edmonton cemetery and Cemetery House)		
Impacts on Archaeological Priority Area	None		
Proposal			
Land Use Requirements	Transit site		
Implementation			
Timeframe(years)	0-5 (2020/21 – 2025/26)	5-10 (2026/27 – 2030/31)	10+ (2031/32 – 2041/41)
Approximate Estimated Pitch capacity	Space for a minimum of 15 caravans.		
Proposal			
Delivery Requirements	Provide a site to accommodate a minimum of 15 caravans and the associated vehicles, to meet transit needs identified in the Enfield 2024 GTANA.		
Site Specific Design Principles	<p>Development of the site must:</p> <ul style="list-style-type: none"> • Provide an alternative Skate Park facility within close proximity of at least equivalent standard. • Utilise the existing building on site to create a shared communal space. • Enable all vehicles (including emergency vehicles) to safely enter and exit the site from the A10. • Provide adequate space to safely access and manoeuvre within the site (demonstrated using tracking/ swept path analysis). • Enhance the boundaries to ensure: <ul style="list-style-type: none"> - A secure site; - An improved street scene (particularly along the A10 frontage); - Improvements in local biodiversity; and - Views into the site are minimised to protect the privacy of the site's occupants. • Explore opportunities to mitigate noise impacts from the A10. • Ensure that a pedestrian route is maintained between Edmonton Cemetery and the A10. 		

Appendix C: Monitoring Framework

The Monitoring Framework sets out how the delivery of the TLP policies will be monitored. The key aims of the policy (target/direction) are listed, followed by how it will be monitored (indicator), and the source of the monitoring data. The performance of policies will be reported as part of the Authority Monitoring Report (AMR) at the end of each monitoring year (1st April to 31st March).

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

Policy T2: Design and Site Layout		
Spatial Objective / Council Strategy Outcome		IIA Objectives
Housing, Environment, Health and Happiness, Business		Building Communities, Housing, Transport, Health, Economy and Employment, Landscape and Soils
TARGET / DIRECTION	INDICATOR	SOURCE
All sites traveller sites granted planning permission to accord with the design and layout policy criteria.	Number of sites granted permission for the identified use that comply with the policy requirements.	The primary data (in terms of planning permissions granted will be derived from the London Kibana Datahub and published within the AMR. The Officer Reports on Planning Application will confirm compliance with the requirements of Policy T2.