Enfield Council

Enfield Traveller Local Plan (TLP)
Regulation 20 Representations

November 2026

TLP19- 1 - Mrs Dilan Ay

Respondent: Mrs Dilan Ay

Submission Number:1

Submission Date:28/09/2025 16:41 BST

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to formally object to the proposed permanent traveller site at Bulls Cross, Enfield.

This location is entirely unsuitable for a development of this nature due to the following material planning considerations:

1. Traffic and Highway Safety
2. Bulls Cross Road is already extremely narrow, with vehicles frequently having to give way to oncoming traffic.
3. The road includes the historic Maidens Bridge, which is not designed for heavy vehicles such as caravans or mobile homes.
4. The proposed site would add significant traffic pressure to this fragile network, particularly as additional vehicle movements are already anticipated from the Tottenham Hotspur training ground extension and the proposed housing developments in Crews Hill.
5.
6. Heritage and Environmental Impact
7. The Bulls Cross and Forty Hill area is of historic and cultural importance. It includes Forty Hall Estate, Middleton House and Gardens, and other period properties that attract visitors from across the borough and beyond.
8. Increased noise, traffic, and visual intrusion would seriously harm the character of this green, historic landscape.
9. The site is part of a highly valued local amenity, used daily by residents and visitors for leisure and walking.
10.
11. Amenity for Local Residents
12. The additional traffic, noise, and activity would have a direct negative impact on the quiet enjoyment of the area for residents and visitors.
13. The proposal risks undermining the unique character that makes Bulls Cross and Forty Hill such important parts of Enfield’s heritage and green setting.
14.

For these reasons, I urge the Council to reject this proposed site and to seek alternative, more suitable locations that do not threaten road safety, local heritage, or the amenity of the community.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 2 - Gail Nielen

Respondent: Gail Nielen

Submission Number:2

Submission Date:29/09/2025 15:21 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

4.16 site assessments

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Unsound Basis.
Focus on 4.16 and the land A10 to skate park N99HW. This is still considered a site for transit purposes and my objection is two fold.
Firstly, it is within meters of a large expanse of greenery some of which is SSSI. the Friends of firs farm are working with LBE to expand the wetlands near the site to attract further wildlife and build on the community asset that all enjoy over the last 10 years. [redacted]

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The site near the A10 to the skate park not to be considered as a transit site for travellers.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I have spent over 10 years helping to improve Firs farm park and making it a lovely place for all plus funding to build a community cafe(now open and sovent). [redacted]Hence pleased to be at a hearing and listen/ speak about this issue.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 3 - Mr Gareth Truscott

Respondent: Mr Gareth Truscott

Submission Number:3

Submission Date:29/09/2025 15:25 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
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Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted] site next to a cemetry, with access off a busy dual carriage way. This is not an appropriate location.

Vehicular access to that site is not safe.

I know from experience that there will be people grieving and paying their respects in the cemetry. They will want their privacy and space -[redacted]

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You will need to find another site, instead of the land at the A10.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report		✓
Adoption of Traveller Local Plan		✓

TLP19- 4 - Mr Ashok Tailor

Respondent: Mr Ashok Tailor

Submission Number:4

Submission Date:29/09/2025 17:09 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Details of Objection – Land at A10 (Site 3)

I consider the Enfield Traveller Local Plan to be **not legally compliant, unsound, and failing to comply with the Duty to Cooperate** for the following reasons:

1. **Loss of Community Facility**: Land at A10 (Site 3) is currently a community skate park supporting children and young people. The NPPF (§§99–101) requires protection of recreational facilities unless proven surplus or replaced. No evidence exists that this requirement has been met.
2. **Proximity to Schools**: The site is close to multiple schools, including Winchmore School, Firs Farm Primary, Highfield Primary, Palmers Green High, Aylward Academy, and The Latymer School. The skate park currently provides safe after-school recreation. Its loss and the additional traffic from a new Traveller site would negatively impact school pupils' health, wellbeing, and safety.
3. **Health Infrastructure Pressure**: The nearest GP practice (Winchmore Hill Practice) already serves ~21,500–22,000 patients, indicating high existing demand. Enfield relies on extended-hours hubs to relieve pressure, and Healthwatch feedback documents difficulties accessing GP services. The Plan does not provide a health impact assessment, so the new site risks exacerbating waiting times and reducing access for both current and future residents.
4. **Failure to Demonstrate Duty to Cooperate**: There is no evidence that local schools, NHS services, or community organisations were engaged regarding the impacts of allocating this site. Without such engagement, the Plan does not fully comply with the statutory Duty to Cooperate.
5. **Lack of Justification and Effectiveness**: No evidence shows that the allocation is compatible with local infrastructure or recreational facilities, and reasonable alternatives have not been fully explored. This renders the Plan not positively prepared, not justified, not effective, and not consistent with national policy.

Requested Action: Remove Land at A10 (Site 3) from the Plan, or, if retained, provide evidence of replacement recreational provision, mitigation of school and traffic impacts, and confirmation that local health services can accommodate additional demand.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Representation Regarding the Integrated Impact Assessment (IIA)

I have concerns regarding the Integrated Impact Assessment (IIA) accompanying the Traveller Local Plan. The IIA appears to inadequately assess the impacts of allocating Land at A10 (Site 3) on community facilities, education, and health infrastructure. Specifically:

1. **Community and Recreational Impacts**: The IIA does not properly evaluate the loss of the existing skate park, a facility used by local youth and the wider community. There is no assessment of mitigation or replacement recreational provision.

2. **Education Impacts**: The IIA does not sufficiently consider the site's proximity to multiple schools and the potential safety, access, and wellbeing implications for pupils due to increased traffic and loss of recreational space.
3. **Health Impacts**: The IIA does not provide evidence that local health services (GPs, urgent care, specialist services) have the capacity to accommodate the additional demand generated by the proposed site, nor does it outline mitigation measures.
4. **Duty to Cooperate**: There is no indication in the IIA that relevant stakeholders (schools, NHS bodies, or community organisations) were actively consulted to inform its assessment.

In summary, the IIA does not provide sufficient evidence to support the allocation of Land at A10 (Site 3) and therefore does not satisfy legal compliance or soundness requirements. The Plan should either remove this allocation or update the IIA to fully assess these impacts with appropriate mitigation strategies.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications to Make the Traveller Local Plan Legally Compliant and Sound

To address the issues identified in relation to Land at A10 (Site 3), the following modifications are necessary:

1. **Remove the Allocation of Land at A10 (Site 3)**
   - **Reason:** Removing this site will prevent the loss of an existing community skate park, avoid potential negative impacts on nearby schools, and remove the risk of undue pressure on local health services. This ensures compliance with the NPPF (§§92, 99–101) and addresses unsoundness regarding justification, effectiveness, and positive preparation.
2. **If the Site is Retained – Provide Equivalent Replacement Recreational Facilities**
   - **Suggested Wording:** "Any development on Land at A10 (Site 3) must provide equivalent or better recreational provision to replace the existing skate park prior to occupation."
   - **Reason:** Ensures compliance with NPPF requirements for open space protection and supports the Plan's positive preparation and effectiveness.
3. **Mitigate Impacts on Schools and Traffic**
   - **Suggested Wording:** "Development proposals must demonstrate mitigation of traffic and pedestrian impacts on nearby schools, including safe access and drop-off arrangements, prior to occupation."
   - **Reason:** Ensures the Plan is justified and effective by addressing impacts on local education and community safety.
4. **Health Service Assessment and Mitigation**
   - **Suggested Wording:** "No development shall proceed until evidence is provided that local health services (including GP practices and extended care facilities) can accommodate the additional population, or until mitigation measures (e.g., funding for additional GPs or expanded facilities) are secured."

- **Reason:** Addresses unsoundness by ensuring the Plan is effective and justified in terms of infrastructure capacity.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

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A specific policy in the Traveller Local Plan
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Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	

Complies with the duty to co-operate ✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

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2. **Proximity to Schools**: The site is close to multiple schools, including Winchmore School, Firs Farm Primary, Highfield Primary, Palmers Green High, Aylward Academy, and The Latymer School. The skate park currently provides safe after-school recreation. Its loss and the additional traffic from a new Traveller site would negatively impact school pupils' health, wellbeing, and safety.
3. **Health Infrastructure Pressure**: The nearest GP practice (Winchmore Hill Practice) already serves ~21,500–22,000 patients, indicating high existing demand. Enfield relies on extended-hours hubs to relieve pressure, and Healthwatch feedback documents difficulties accessing GP services. The Plan does not provide a health impact assessment, so the new site risks exacerbating waiting times and reducing access for both current and future residents.
4. **Failure to Demonstrate Duty to Cooperate**: There is no evidence that local schools, NHS services, or community organisations were engaged regarding the impacts of allocating this site. Without such engagement, the Plan does not fully comply with the statutory Duty to Cooperate.
5. **Lack of Justification and Effectiveness**: No evidence shows that the allocation is compatible with local infrastructure or recreational facilities, and reasonable alternatives have not been fully explored. This renders the Plan not positively prepared, not justified, not effective, and not consistent with national policy.

Requested Action: Remove Land at A10 (Site 3) from the Plan, or, if retained, provide evidence of replacement recreational provision, mitigation of school and traffic impacts, and confirmation that local health services can accommodate additional demand.

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2. **Education Impacts**: The IIA does not sufficiently consider the site's proximity to multiple schools and the potential safety, access, and wellbeing implications for pupils due to increased traffic and loss of recreational space.
3. **Health Impacts**: The IIA does not provide evidence that local health services (GPs, urgent care, specialist services) have the capacity to accommodate the additional demand generated by the proposed site, nor does it outline mitigation measures.
4. **Duty to Cooperate**: There is no indication in the IIA that relevant stakeholders (schools, NHS bodies, or community organisations) were actively consulted to inform its assessment.

In summary, the IIA does not provide sufficient evidence to support the allocation of Land at A10 (Site 3) and therefore does not satisfy legal compliance or soundness requirements. The Plan should either remove this allocation or update the IIA to fully assess these impacts with appropriate mitigation strategies.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modifications to Make the Traveller Local Plan Legally Compliant and Sound

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1. **Remove the Allocation of Land at A10 (Site 3)**
   - **Reason:** Removing this site will prevent the loss of an existing community skate park, avoid potential negative impacts on nearby schools, and remove the risk of undue pressure on local health services. This ensures compliance with the NPPF (§§92, 99–101) and addresses unsoundness regarding justification, effectiveness, and positive preparation.
2. **If the Site is Retained – Provide Equivalent Replacement Recreational Facilities**
   - **Suggested Wording:** "Any development on Land at A10 (Site 3) must provide equivalent or better recreational provision to replace the existing skate park prior to occupation."
   - **Reason:** Ensures compliance with NPPF requirements for open space protection and supports the Plan's positive preparation and effectiveness.

3. **Mitigate Impacts on Schools and Traffic**
    - **Suggested Wording:** "Development proposals must demonstrate mitigation of traffic and pedestrian impacts on nearby schools, including safe access and drop-off arrangements, prior to occupation."
    - **Reason:** Ensures the Plan is justified and effective by addressing impacts on local education and community safety.
4. **Health Service Assessment and Mitigation**
    - **Suggested Wording:** "No development shall proceed until evidence is provided that local health services (including GP practices and extended care facilities) can accommodate the additional population, or until mitigation measures (e.g., funding for additional GPs or expanded facilities) are secured."
    - **Reason:** Addresses unsoundness by ensuring the Plan is effective and justified in terms of infrastructure capacity.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 5 - Jude Taw

Respondent: Jude Taw

Submission Number:5

Submission Date:05/10/2025 09:14 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site at A10 skate park

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I object to the use of the skate park on the A10 [redacted], young people are another vulnerable group whose rights and spaces deserve to be protected. There is precious little for young people to do in the borough, outside of school, especially in the age group most attracted to the skate park, namely teens. In a generation who are addicted to the internet and in whom obesity is becoming epidemic, it is staggering to consider reducing access to recreational space where they can exercise, learn skills and concentrate on being physical and loving movement. As usual it's short-termist, non-strategic, non-holistic planning by pen pushers.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Find alternative sites. Convert an existing car park for example. Encourage people to use other forms of transportation so that car parks are not as needed. Somewhere more appropriate for humans to live (then noise and pollution from the A10 would be horrendous).

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report		✓
Adoption of Traveller Local Plan	✓	

TLP19- 6 - Mr Paul Tivnann

Respondent: Mr Paul Tivnann

Submission Number:6

Submission Date:05/10/2025 10:38 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This should be kept for young people

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

TLP19- 7 - Local Resident

Respondent: Mr Jonathan RossLocal Resident
On-behalf of: Local Resident

Submission Number:7

Submission Date:06/10/2025 14:52 BST

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

In choosing The Ridgeway site as a preferred location, the plan ignores the following factors:

The site is on designated greenbelt land.

There are no services to the site such as water, sewerage, gas or electricity.

The site is highly susceptible to flooding and is an awkward shape making it difficult to access from the main road.

The Ridgeway is a busy main thoroughfare with fast flowing traffic which would pose a real danger to caravans accessing or leaving the proposed site.

The location is remote with no quick access to local shops, doctors surgery or schools.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 8 - Mr Steve de Vos

Respondent: Mr Steve de Vos

Submission Number:8

Submission Date:08/10/2025 06:31 BST

3 Enfield's Traveller Needs

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 3

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Not justified - Need is not evidenced

§ The TLP states the following need:

o 20 permanent pitches in the short term (<5 years from Plan adoption);

o 10 permanent pitches in the longer term ([2031] to 2041);

o 15+ pitches on one transit site.

§ The need for 30 permanent pitches was identified in the 2020 GTANA, even though semi-annual government statistics between 2010 and 2020 showed nil activity (https://www.gov.uk/government/collections/traveller-caravan-count#2018):

Date / Period	Tolerated unauthorised caravans on land not owned by travellers
January 2025	41
July 2024	373
January 2024	22
July 2023	30
2010 – January 2023	0

§ The need was therefore based on hypothetical assumptions. Four data points in the past two years is insufficient to robustly evidence a permanent need, as required by government policy (para 7c) of 'Planning policy for traveller sites').

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Number of pitches to be reduced until such time that actual use supports the chosen number.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

4 Site Allocations

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 4

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Not consistent with national policies - Green Belt

The Exceptional Circumstances Topic Paper makes no mention of the very limited data supporting the stated need (4 data points in the last two years), and the exceptional circumstances for Green Belt release have not been robustly evidenced.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Green Belt allocation, i.e. Site 2, to be removed from the Plan until use evidences a need.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan

* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site 2

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Not justified - Site 2 / Land adjacent to Ridgeway

§ Allocation of the site, which is to be the largest and provide up to 12 permanent pitches, is inappropriate:

o Government policy (para 4j) requires provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure. The TLP states that a "*bus stop is conveniently located at the entrance*", and quotes travel times to schools and a GP. However, the site is a PTAL 1a location, there is no indication that the GP and schools accept new entries, and the site scores worst in the IIA - it is the only site with negative scores for *Education* and *Services & Facilities*.

o There is virtually no other housing within 1 mile of the site. Its isolation is contrary to government policy (para 13a), which requires LPAs to ensure that policies promote integrated co-existence with the local community.

o Although the TLP (para 5.2) refers to the government's Good Practice Guide, it does so selectively and ignores that the elongated triangular shape of the site requires undesirable linear positioning of caravans, rather than the preferred circular or horseshoe arrangement outlined in said Guide.

o Bends in The Ridgeway obstruct the view in both directions when exiting the site, resulting in unsafe access to the A1005. Traffic on this road will increase dramatically as it will be the main access route to the Crews Hill and Chase Park developments. The draft Local Plan proposes 9,000 new homes in those locations and the recently published shortlist of New Towns would increase that to 21,000.

o The elongated shape of the site means development would significantly detract from the appearance and character of the rural locality.

o The Enfield Characterisation Study (doc DES42, page 120) states that "*the Farmland Ridge and Valleys is the borough's most important landscape type and forms a special area of landscape character which is a major asset for the borough. It is of both landscape and historic significance …. The existing Green Belt boundary should be retained and protected, and future development and land use changes resisted*".

o The draft Local Plan does not propose to release this land, which is surrounded by Important Local Views – see map below.

§ In short, the allocation of Site 2 is fundamentally flawed:

o The need for 30 pitches is not supported by robust evidence.

o It is nonsensical to build the largest development in the location with the worst IIA scores.

o The allocation ignores that the locality has a large number of Important Local Views, as designated in the draft Local Plan.

o The exceptional circumstances for Green Belt release have not been evidenced.

o The TLP (para 5.14) indicates that the site performs strongly on the Green Belt purposes. The proposed New Town will decimate the local Green Belt, and Site 2's contribution to the first Green Belt purpose will become even greater.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Remove Site 2 from the Plan.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. Picture 1.png
2. Picture 2.png

TLP19- 9 - Mrs Sinead Holmes

Respondent: Mrs Sinead Holmes

Submission Number:9

Submission Date:08/10/2025 14:49 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

- Not positively prepared
- Not justified
- * Not effective
- * Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The Land adjacent to A10 is an active community asset designed to given local residents and children somewhere to entertain themselves otherwise they will be loitering in the street. The site itself is next to a very busy A road which is in constant use, day and night. The prospect of caravans and associated vehicles moving onto such a busy and active road is fundamentally irresponsible from the council and will result in traffic accidents, especially when you consider the location of the bus stop (adjacent to the skate park) and the busy junction, traffic lights on Church Street.

[redacted]

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

The Council must consider not only the impact that the travellers site will have on the local area but also mindful of the choice of environment they are providing this traveller community. This site is woefully inadequate and is not a safe environment for anyone to live on. (based on the plans, the site will be overcrowded with caravans [redacted]It would be far more logical to proposed sites where there is some sort of buffer between the site and a main road for the protection of the travelling community.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Enfield council should consider site which are more apt for this purpose. Somewhere further into the green belt of Enfield which would provide a better quality of living for the travelling community.
[redacted]

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 10 - Mrs Maria Brezitski

Respondent: Mrs Maria Brezitski

Submission Number:10

Submission Date:10/10/2025 12:16 BST

Traveller Local Plan Regulation 19

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe Enfield’s Traveller Local Plan is **not sound** because it hasn’t been prepared in a balanced or fully evidence-based way. In particular, it’s **not positively prepared, not justified, not effective, and not consistent with national policy**.

1. Not positively prepared
It doesn't seem that the plan has been developed through genuine engagement with local residents or service providers. There's little evidence that the Council has properly assessed whether local health, education, and transport services could realistically support additional sites. Local people have had limited opportunity to be involved in these early discussions, which makes the process feel one-sided rather than collaborative.

2. Not justified
The evidence behind the plan is unclear. It isn't obvious how the proposed number of pitches or sites was decided, or whether other, more suitable locations were properly considered. Without this transparency, it's hard to see how the plan can be described as fair or based on solid evidence.

3. Not effective
There's very little detail about how the plan will actually work in practice — how sites will be delivered, how potential issues like traffic, safety, and environmental impact will be managed, or how the Council will promote good relations between Traveller and settled communities. Without these details, it's difficult to believe the plan can achieve its aims.

4. Not consistent with national policy
National planning policy makes it clear that Traveller sites should be in sustainable locations, with good access to local facilities, and should avoid putting extra pressure on local infrastructure. It also says local authorities must protect the Green Belt and high-quality open land. From the information provided, I don't think these principles have been fully followed or evidenced in Enfield's plan.

In summary, I don't believe this plan is ready to move forward in its current form. It needs clearer evidence, a more open consultation with residents, and a stronger plan for how the proposals would work in practice — both for the Traveller community and for the wider Enfield community.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I am concerned that the Integrated Impact Assessment does not appear to fully consider the impact of the proposed Traveller sites on local infrastructure, environmental sustainability, and community wellbeing. It isn't clear how the assessment has taken into account the cumulative effects on local services such as healthcare, schools, and transport, or how potential impacts on the Green Belt and local environment will be mitigated. For these reasons, I do not believe the IIA provides enough evidence to demonstrate that the plan is sound or legally compliant.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Traveller Local Plan sound, justified, and positively prepared, the following modifications are needed:

1. **Comprehensive Site Assessment Transparency**
   The Council should publish a detailed and transparent site selection assessment, showing how all potential locations were evaluated, including environmental constraints (e.g. flood risk, Green Belt, transport access, and local infrastructure).
   Why this is needed: Without this evidence, it is not possible to confirm that the chosen sites are the most sustainable or suitable options, making the plan unjustified and inconsistent with national planning policy.
2. **Full Community and Infrastructure Impact Assessment**
   The plan should include an updated assessment of the impact on local services—particularly healthcare, schools, parking, and roads—and demonstrate how additional capacity will be provided.
   Why this is needed: Current infrastructure in parts of Enfield is already under pressure, and without mitigation measures the plan is not effective or deliverable.
3. **Clear Delivery and Management Framework**
   The Plan should identify clear responsibilities and funding mechanisms for site delivery, maintenance, and management, including how integration and community safety will be supported.
   Why this is needed: This will make the plan more effective and ensure that sites are sustainable in the long term.
4. **Reassessment of Green Belt and Environmental Impact**
   The Plan should commit to avoiding development on Green Belt or environmentally sensitive land unless there are no reasonable alternatives and full justification is provided.
   Why this is needed: This would bring the plan in line with the National Planning Policy Framework (NPPF) and protect Enfield's natural character.
5. **Meaningful Consultation with Local Residents**
   The Council should extend and improve community consultation, ensuring local residents' views are properly considered before finalising site allocations.
   Why this is needed: This would make the plan more positively prepared and demonstrate compliance with the duty to cooperate with affected communities.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

2 Planning Policy and Evidence

Comment Number: 5

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Planning Policy and Evidence

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe the Enfield Traveller Local Plan (TLP) is **not legally compliant and not fully sound** for the following reasons:

1. **Not positively prepared / Not justified**
   The plan says that neighbouring councils were contacted, but it's not clear that all reasonable options were explored to meet Traveller accommodation needs. Just noting that no other council can help doesn't show that the council looked at alternative ways to meet the need. Without showing this, the plan can't be considered well-prepared or fully justified.

2. **Not effective**
   The plan doesn't provide enough detail on how the proposed sites will actually be delivered or managed, or how infrastructure and services will support them. Without this, it's not clear the plan can achieve its goals.
3. **Not consistent with national policy**
   The plan does not clearly show that the proposed sites are safe, sustainable, or accessible, which is required under national planning guidance for Traveller sites. The evidence for site selection and suitability isn't transparent.
4. **Duty to Co-operate concerns**
   The plan includes a statement about the Duty to Co-operate, but it doesn't show meaningful engagement or joint problem-solving with neighbouring councils or other organisations. Simply saying that no other council can help does not demonstrate the proactive cooperation expected by law.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I have concerns that the IIA does not fully demonstrate that the Traveller Local Plan has been assessed for its impact on neighbouring areas, communities, and the environment. In particular:

- It is unclear whether alternative sites or approaches were adequately considered to minimise environmental, social, or infrastructure impacts.
- The assessment does not provide sufficient evidence that the needs of all Traveller communities have been balanced with the wider public interest.
- There is limited detail on how potential negative impacts will be mitigated or monitored over time.

Without this level of detail, the IIA does not fully support the plan's claims of sustainability and soundness, and it raises questions about whether the Duty to Co-operate has been meaningfully met in relation to potential impacts on neighbouring areas.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Evidence of Site Selection and Alternatives

- **Issue:** The Plan does not clearly show that alternative sites or approaches were fully assessed to meet Traveller accommodation needs while minimising environmental, social, and infrastructure impacts.
- **Modification:** Include a section summarising all alternative sites considered, reasons for their acceptance or rejection, and the expected impacts of the chosen sites.
- **Why this helps:** Demonstrates that the plan is positively prepared, justified, and effective, meeting the legal requirement for sound plan-making.

2. **Integrated Impact Assessment (IIA) Details**

- **Issue:** The IIA lacks sufficient detail on mitigation measures and monitoring of potential negative impacts.
- **Modification:** Revise the IIA to include:
  - Clear mitigation strategies for environmental, social, and community impacts.
  - A monitoring framework showing how the Plan's implementation will be tracked and evaluated.
- **Why this helps:** Strengthens the evidence base for the Plan and ensures decisions are informed by clear impact assessments, supporting soundness.

3. **Clarity on Meeting Traveller Needs**

- **Issue:** The Plan does not sufficiently justify why Enfield cannot support neighbouring authorities or whether cross-boundary options were considered.
- **Modification:** Include a statement summarising engagement with neighbouring authorities, the evidence considered, and the rationale for current site allocations.
- **Why this helps:** Demonstrates the Plan is justified and positively prepared, even if cross-boundary support is unavailable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

3 Enfield's Traveller Needs

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan

A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

3. Enfield’s Traveller Needs

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I have concerns about the soundness of the Plan in this section. While the figures for pitch requirements are clearly stated, the Plan does not appear to provide sufficient justification for the site allocations or explain why alternative sites or options have not been considered in more detail. For example:

- The calculation of a five-year supply and longer-term need seems somewhat arbitrary, and there is limited explanation of how the proposed sites were chosen to meet these needs.
- The Plan does not clearly demonstrate how the allocated sites will be deliverable, particularly given infrastructure, environmental, or access constraints.
- There is no evidence that potential impacts on neighbouring communities or land uses have been fully assessed.

Because of these gaps, the Plan does not appear to be fully **positively prepared**, **justified**, or **effective**, and it may not be entirely **consistent with national policy**, which requires that site allocations be deliverable, sustainable, and supported by robust evidence.

To make the Plan more sound, it would be helpful for the Council to:

- Provide a clearer explanation of how the proposed sites were selected, including consideration of alternatives.
- Demonstrate that each site can realistically deliver the required number of pitches within the five-year supply period.
- Include more detailed evidence of potential impacts and mitigation measures for local communities and the environment.

Overall, the Plan should provide stronger justification and transparency so that the decisions are clearly evidenced, defensible, and aligned with the NPPF guidance on Traveller sites.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I have reviewed the accompanying IIA and have concerns about whether it fully supports the Plan's soundness. While the IIA outlines potential environmental and social impacts, it does not appear to clearly link these assessments to the deliverability of the proposed Traveller sites. Specifically:

- There is limited evidence that the IIA considered the feasibility of the sites in relation to infrastructure, access, or environmental constraints.
- The assessment does not clearly show how potential negative impacts on local communities or the natural environment will be mitigated.
- It is unclear whether alternatives to the proposed sites were fully evaluated in the IIA.

To improve the Plan's soundness and legal compliance, the IIA should provide a more robust evaluation that directly informs site selection, demonstrates mitigation measures, and shows that the sites are deliverable in practice.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- **Provide clearer site feasibility evidence**
  Modification: Include detailed evidence that each proposed site is deliverable, taking into account infrastructure, environmental constraints, and access to services.
  Rationale: This will demonstrate that the Plan's proposals are practical and achievable, addressing concerns about soundness and deliverability.
- **Strengthen the Integrated Impact Assessment (IIA)**
  Modification: Update the IIA to explicitly link potential impacts to each proposed site, show mitigation measures, and provide evidence that alternative sites were considered.
  Rationale: This ensures the Plan is justified and positively prepared by demonstrating that environmental, social, and community impacts have been properly assessed and addressed.
- **Clarify site allocation for the 5-year supply**
  Modification: Provide a clear breakdown of which sites contribute to the first five years' supply of Traveller pitches, including timelines for delivery.

Rationale: This will make the Plan effective and consistent with national policy, showing how targets will be met and reducing the risk of speculative applications.

- **Improve clarity in policy wording**
  Modification: Include precise language on site standards, location criteria, and management responsibilities to ensure sites meet the needs of the Traveller community while protecting local residents and the environment.
  Rationale: Clearer policy wording ensures the Plan is positively prepared, justified, and effective.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

4 Site Allocations

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

4 Site Allocations

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I consider this section of the Traveller Local Plan unsound because the proposed site allocations rely on removing land from the Green Belt and de-designating Metropolitan Open Land without sufficient justification. The Exceptional Circumstances Topic Paper does not convincingly demonstrate that all reasonable alternatives were fully explored, including potential sites outside the Green Belt or MOL, or opportunities for shared provision with neighbouring boroughs.

The plan also lacks clarity on how the sites will meet the identified need in practice, including timelines for delivery and detailed assessments of site suitability. Without this, the plan is not positively prepared, not justified, and not effective. It also risks being inconsistent with national policy, which prioritises protecting Green Belt and MOL areas and ensuring Traveller sites are deliverable and sustainable.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I have concerns regarding the Integrated Impact Assessment (IIA) as it relates to the proposed Traveller site allocations. The IIA does not provide sufficient evidence that the environmental, social, and heritage impacts of removing land from the Green Belt and de-designating Metropolitan Open Land have been fully assessed or mitigated. In particular, there is limited analysis of impacts on local open space, community facilities, and ecological features.

A more thorough and transparent assessment is needed to ensure the plan is legally compliant, justified, and sound, demonstrating that alternative sites were properly considered and that any negative impacts are minimised

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of

modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. **Reconsider Site Allocations:** The plan should not allocate land from the Green Belt or Metropolitan Open Land (MOL) without stronger justification. Alternative sites that do not impact protected open spaces or community recreational facilities (e.g., skate parks) should be identified first.
2. **Strengthen Evidence and Assessment:** The TLP should include a more robust and transparent site selection process, showing clearly why each proposed site is the only viable option. This should include environmental, recreational, heritage, and transport impacts.
3. **Review Exceptional Circumstances:** The plan must provide clearer, stronger evidence for the claimed "exceptional circumstances" to justify Green Belt and MOL de-designation.
4. **Enhance Deliverability and Capacity Assessments:** Further detailed investigations (e.g., tree surveys, utilities, flood risk) should be completed before allocation to ensure sites are genuinely capable of safely accommodating Traveller pitches and transit provision.

Rationale:
These modifications are necessary to make the plan legally compliant and sound because they ensure:

- The plan is positively prepared and justified with a robust evidence base.
- It protects Green Belt, MOL, and local recreational and heritage assets in line with national planning policy.
- Allocated sites are effective, safe, and deliverable.
- Decision-making is transparent, consistent, and defensible.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land at A10 (Site 3)

Comment Number: 4

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I consider this allocation unsound and not legally compliant. The site is designated as Metropolitan Open Land (MOL) and currently serves as a public Skate Park and recreational area. Allocating it for Traveller transit provision would remove valued community facilities, reduce public access to open space, and harm the character of the area.

There is insufficient evidence that alternative, non-MOL sites have been adequately considered or that exceptional circumstances exist to justify de-designating MOL. The plan does not adequately assess the impacts on nearby heritage assets, including Edmonton Cemetery and Cemetery House, or the loss of recreational and ecological value.

Without proper justification, mitigation, and consideration of alternatives, this part of the plan fails to be positively prepared, justified, effective, or consistent with national policy.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I have concerns that the Integrated Impact Assessment (IIA) does not fully capture or assess the negative impacts of allocating Metropolitan Open Land (MOL) and Green Belt sites for Traveller provision. The assessment appears to underestimate the loss of community and recreational space, potential effects on local heritage assets, and the environmental and social impacts on nearby residents.

A more robust evaluation of alternative sites, mitigation measures, and the wider community impact is needed to ensure the plan is legally compliant, sound, and consistent with national policy.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. **Site Selection and Green Belt/MOL Allocations:**
   - Do not allocate Metropolitan Open Land (MOL) or Green Belt sites, such as the A10 site, for Traveller provision unless exceptional circumstances can be robustly demonstrated with full consideration of alternatives.
   - If sites must be allocated, a clear, evidence-based explanation of why no alternative sites exist, with detailed assessment of environmental, heritage, recreational, and community impacts, should be included.
   - Suggested wording for Policy TLP2 or supporting text:
     "No Traveller sites will be allocated on Green Belt or MOL land unless a comprehensive assessment demonstrates that no suitable alternative sites exist and that exceptional circumstances apply, with full mitigation measures in place to protect environmental, heritage, and recreational interests."
2. **Integrated Impact Assessment (IIA):**
   - The IIA should be revised to provide a thorough evaluation of the social, environmental, and heritage impacts of proposed site allocations, including consultation with local residents and relevant stakeholders.
   - Suggested wording:
     "The Integrated Impact Assessment must fully assess potential impacts of all proposed Traveller site allocations, including environmental, heritage, and community effects, and identify mitigation measures to ensure sustainable, acceptable development."
3. **Transparency and Evidence for Exceptional Circumstances:**

- Provide detailed, publicly accessible evidence demonstrating that the claimed exceptional circumstances justify MOL/Green Belt release. This will make the plan defensible, legally compliant, and aligned with national policy.

These modifications would ensure that the plan is positively prepared, justified, effective, and consistent with national policy, addressing the legal compliance and soundness concerns identified.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Appendix B – Site Allocation Proforma: Site 3

Comment Number: 6

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Appendix B – Site Allocation Proforma: Site 3

Do you consider Enfield's Traveller Local Plan:

	Yes	No

Is legally compliant	✓
Is sound	✓
Complies with the duty to co-operate	✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I consider the allocation of Land at A10 for a Traveller transit site to be unsound, not legally compliant, and inconsistent with national policy for the following reasons:

1. **Green Belt / MOL and Recreational Use:** The site includes a functioning public skate park and is designated as Metropolitan Open Land (MOL). Allocating this land for development would remove recreational facilities and open space, contrary to national policy protecting MOL and Green Belt land. Exceptional circumstances have not been convincingly demonstrated.
2. **Heritage Considerations:** The site lies adjacent to locally listed Edmonton Cemetery and Cemetery House. The plan does not provide sufficient evidence that impacts on heritage assets have been assessed or mitigated.
3. **Public Transport & Accessibility:** The site has a low PTAL (2), which is inadequate for sustainable access, contrary to the plan's stated objective to locate Traveller sites in areas with good access to facilities and transport.
4. **Community Impact:** There is limited evidence that local community views have been considered or that the site is suitable for integration with surrounding areas, raising concerns about social acceptability and sustainability.
5. **Alternatives Not Fully Explored:** The plan does not adequately demonstrate that all alternative sites, including non-MOL or non-Green Belt land, have been considered. Without a thorough, evidence-based site assessment, this allocation is not justified or positively prepared.

In summary, the allocation fails to meet key national planning requirements and is not supported by sufficient evidence regarding exceptional circumstances, heritage, accessibility, and community impact. The plan should reconsider this allocation and provide more detailed justification or alternative locations that meet transit needs without impacting protected land or existing community facilities.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I have concerns that the Integrated Impact Assessment (IIA) does not fully reflect the potential impacts of the proposed Land at A10 allocation. In particular:

- **Environmental and recreational impact:** The IIA does not adequately assess the loss of the existing skate park and MOL open space.
- **Heritage impact:** Proximity to Edmonton Cemetery and Cemetery House is not fully addressed.
- **Sustainability and accessibility:** Low public transport access (PTAL 2) is not considered in the assessment of site suitability.

I believe the IIA should be revised to provide a more thorough, evidence-based evaluation of these impacts to ensure that any site allocations are legally compliant, sound, and consistent with national policy.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. **Remove or reallocate Land at A10 from the Traveller Local Plan:** The current allocation is not justified due to its impacts on Metropolitan Open Land, the existing skate park, and proximity to locally listed heritage sites. Consider alternative sites that do not compromise protected open space, recreational facilities, or heritage assets.
2. **Strengthen site selection criteria and evidence base:** Amend the plan to include a more detailed, transparent assessment of potential sites, clearly demonstrating why any site proposed is the most appropriate option. This will address concerns about soundness, effectiveness, and consistency with national policy.
3. **Enhance Integrated Impact Assessment (IIA):** Update the IIA to fully evaluate environmental, recreational, heritage, and transport impacts of any proposed sites, ensuring compliance with legal obligations and national planning guidance.

Rationale:
These modifications would make the plan legally compliant and sound by ensuring:

- Decisions are justified and positively prepared, with a robust evidence base.
- Impacts on open space, recreation, heritage, and sustainability are properly considered.
- Site allocations are effective, deliverable, and aligned with national policy, avoiding unnecessary harm to communities and protected land.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

IIA

Comment Number: 7

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe Enfield's Traveller Local Plan is **not sound** because it hasn't been prepared in a balanced or fully evidence-based way. In particular, it's **not positively prepared, not justified, not effective, and not consistent with national policy**.

1. Not positively prepared
It doesn't seem that the plan has been developed through genuine engagement with local residents or service providers. There's little evidence that the Council has properly assessed whether local health, education, and transport services could realistically support additional sites. Local people have had limited opportunity to be involved in these early discussions, which makes the process feel one-sided rather than collaborative.

2. Not justified
The evidence behind the plan is unclear. It isn't obvious how the proposed number of pitches or sites was decided, or whether other, more suitable locations were properly considered. Without this transparency, it's hard to see how the plan can be described as fair or based on solid evidence.

3. Not effective
There's very little detail about how the plan will actually work in practice — how sites will be delivered, how potential issues like traffic, safety, and environmental impact will be managed, or how the Council will promote good relations between Traveller and settled communities. Without these details, it's difficult to believe the plan can achieve its aims.

4. Not consistent with national policy
National planning policy makes it clear that Traveller sites should be in sustainable locations, with good access to local facilities, and should avoid putting extra pressure on local infrastructure. It also says local authorities must protect the Green Belt and high-quality open land. From the information provided, I don't think these principles have been fully followed or evidenced in Enfield's plan.

In summary, I don't believe this plan is ready to move forward in its current form. It needs clearer evidence, a more open consultation with residents, and a stronger plan for how the proposals would work in practice — both for the Traveller community and for the wider Enfield community.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I am concerned that the Integrated Impact Assessment does not appear to fully consider the impact of the proposed Traveller sites on local infrastructure, environmental sustainability, and community wellbeing. It isn't clear how the assessment has taken into account the cumulative effects on local services such as healthcare, schools, and transport, or how potential impacts on the Green Belt and local environment will be mitigated. For these reasons, I do not believe the IIA provides enough evidence to demonstrate that the plan is sound or legally compliant.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Traveller Local Plan sound, justified, and positively prepared, the following modifications are needed:

1. **Comprehensive Site Assessment Transparency**
   The Council should publish a detailed and transparent site selection assessment, showing how all potential locations were evaluated, including environmental constraints (e.g. flood risk, Green Belt, transport access, and local infrastructure).
   Why this is needed: Without this evidence, it is not possible to confirm that the chosen sites are the most sustainable or suitable options, making the plan unjustified and inconsistent with national planning policy.
2. **Full Community and Infrastructure Impact Assessment**
   The plan should include an updated assessment of the impact on local services—particularly healthcare, schools, parking, and roads—and demonstrate how additional capacity will be provided.
   Why this is needed: Current infrastructure in parts of Enfield is already under pressure, and without mitigation measures the plan is not effective or deliverable.
3. **Clear Delivery and Management Framework**
   The Plan should identify clear responsibilities and funding mechanisms for site delivery, maintenance, and management, including how integration and community safety will be supported.
   Why this is needed: This will make the plan more effective and ensure that sites are sustainable in the long term.
4. **Reassessment of Green Belt and Environmental Impact**
   The Plan should commit to avoiding development on Green Belt or environmentally sensitive land unless there are no reasonable alternatives and full justification is provided.
   Why this is needed: This would bring the plan in line with the National Planning Policy Framework (NPPF) and protect Enfield's natural character.
5. **Meaningful Consultation with Local Residents**
   The Council should extend and improve community consultation, ensuring local residents' views are properly considered before finalising site allocations.
   Why this is needed: This would make the plan more positively prepared and demonstrate compliance with the duty to cooperate with affected communities.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	

Adoption of Traveller Local Plan	✓

TLP19- 11 - MRS Emily Rawson

Respondent: MRS Emily RawsonFlykid

Submission Number:11

Submission Date:10/10/2025 14:35 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Whole

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Planning

- This site is **Metropolitan Open Land (MOL)** — protected green space that should remain free from development. Building here would **set a dangerous precedent** and undermine long-standing protections for open land across London.
- The proposal **directly contradicts** the **London Plan** and the **Enfield Local Plan**, both of which prioritise safeguarding open, natural spaces for community and environmental benefit.

Safety

- The proposed entrance from the **A10** sits **dangerously close to a busy junction and bus stop**, creating serious **safety risks** for drivers, cyclists, and pedestrians alike.
- The extra vehicle movements generated by this plan would **add congestion**, increase the risk of **accidents**, and make an already hazardous stretch of road even worse.

Health / Environment

- The site's closeness to the **A10** means residents would be exposed to **unacceptable levels of air and noise pollution**, posing clear **health risks** — especially for children and older people.
- The project threatens the delicate **Firs Farm Wetlands ecosystem**, risking **long-term damage** to local wildlife, biodiversity, and an area cherished for its natural beauty.

Community

- The development would **disrupt cherished local spaces** used for recreation, community events, and family activities — the very spaces that make this area special.
- Expanding the site could mean **losing the much-loved skatepark**, a key community hub that gives young people a safe and positive place to gather.
- Local **businesses and community services** could also suffer from the strain and disruption this development would cause.

Scale

- The plan would **double the site's size** with no clear justification — an alarming overreach with no transparency or explanation.
- This location is simply **not suitable for a temporary residential site**. The environmental, health, and infrastructure challenges are far too great to ignore.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

TLP19- 12 - Mrs Sue O'Brien

Respondent: Mrs Sue O'Brien

Submission Number:12

Submission Date:12/10/2025 16:42 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

transit site proposed near Firs Farm Wetlands

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This land is meant to be protected. It is designated as Metropolitan Open Land. Its use for this proposed purpose goes against both the London Plan and Enfield's Local Plan.

The area should remain as natural as possible, not developed; Part of the area is ancient woodland that needs protecting and preserving. Other parts are the newer wetland area which also needs protecting. So much time and effort has gone in to creating this balanced eco system by a dedicated local community. Yet another open section is playing fields for the community. This is our local green space that we cherish.

[redacted]Access to the site would be from the A10 which does not seem particularly safe.

This closeness to the A10 would not be a good location for residential use either.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I strongly feel that you should consider a different site for the reasons stated above.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 13 - mr Oisin Scullion

Respondent: mr Oisin Scullion

Submission Number:13

Submission Date:14/10/2025 20:06 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

TPL.09 Land at A10

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted] I am writing to formally register my objection to Enfield Council's proposal to establish a traveller transit site on the A10, on the grounds outlined below. While I fully support the need for inclusive community planning and the provision of appropriate facilities for all groups, I believe this location is wholly unsuitable and poses a number of serious concerns for both the travelling and settled communities.

1. Safety Concerns for Children
   The proposed site is situated adjacent to the A10, a major and fast-moving dual carriageway. This presents a significant safety risk, particularly to young children, who may inadvertently gain access to the road. The lack of adequate physical barriers or sufficient distance from the highway increases the likelihood of accidents and endangers lives.
2. Traffic Disruption
   The A10 already experiences high volumes of traffic and congestion, especially during peak hours. The addition of vehicles regularly entering and exiting the site would exacerbate this issue, leading to increased traffic obstructions, delays, and potential hazards for other road users.
3. Enforcement of Transit Duration
   [redacted].
4. Potential for Business Use
   There is also concern that the site may be used for commercial activities, such as storage or operation of trade vehicles and equipment. The Council's ability to monitor and prevent such usage remains unproven, and this could lead to an inappropriate intensification of the site and further disruption to the surrounding area.
5. Refuse and Waste Management
   [redacted]
6. Loss of Community Amenity – Skate Park Removal
   The proposed development requires the removal of the existing skate park, a valued amenity for local young people. No alternative location has been proposed within a suitable distance, depriving the local community of a recreational facility that promotes physical activity, social interaction, and wellbeing.
7. Lack of Cost Assessment
   The works necessary to make this site viable — including infrastructure, fencing, waste management, road alterations, and ongoing security — have not been fully costed. Nor have the long-term maintenance costs been assessed or made available to the public. Proceeding without this information represents poor governance and poses financial risks to the Council and taxpayers.
8. Impact on Edmonton Cemetery
   The proposed site is adjacent to the historic Edmonton Cemetery, a place of quiet reflection and remembrance for many residents. [redacted].

For all of these reasons, I strongly urge the Council to reconsider this proposal and to explore more suitable, safe, and community-supported locations for such a facility.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Alternative locations need to be identified.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Dangerous site for young children to be accommodated in due to the proximity to the A10 due carriage way.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination		
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. Objectio to traveler site A10.docx

TLP19- 14 - Artemoulla Bricknell

Respondent: Artemoulla Bricknell

Submission Number:14

Submission Date:16/10/2025 10:00 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to express my deep concern and opposition with relation to the proposed traveller Transit Site on the skatepark next to Church Street in Edmonton. [redacted] This makes absolutely no sense at all. The youths of today have nowhere to go as it is and this piece of land has investments plans in the pipeline to better the area. [redacted]

[redacted] The skatepark is a crucial park of Edmonton for youths that have no where else to go.

For clarity I utterly oppose the proposed traveller transit site in Edmonton.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-14.pdf

TLP19- 15 - Mrs Marina Johnson

Respondent: Mrs Marina Johnson

Submission Number:15

Submission Date:20/10/2025 00:00 BST

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I do not agree that this is the correct site for the traveller site. It is to near to the A10 which will cause traffic build up. There is insufficient room for 15 caravans there. [redacted] It is not a good site. Why not use some of the unused site at meridian water which has better access to the main road systems and is a bigger site which can specifically set up. The site we have at the moment

for the skate park is used quite a lot by the young people of the borough. There isn't many places they can go. This gives them much needed exercise. also the people that live near have to been consulted. Do we need more traffic which would not be good for the environment.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 16 - Mr Alan Parry

Respondent: Mr Alan Parry

Submission Number:16

Submission Date:22/10/2025 20:47 BST

3 Enfield’s Traveller Needs

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 3 Enfield’s Traveller Needs

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The calculation of need (30 pitches over 17 years and 15 transit spaces) has not been undertaken on a sound basis for the following reasons:

a. The analysis is predicated on 14 responses from a maximum sample size of 125 households[1]. The National Audit Office make it clear that sample sizes should be a minimum of 50 cases and outside that they can only be considered case studies with full surveying preferred2. Using a Qualtrics industry standard calculator a sample size of 55 would be required for 95% certainty at a 10% margin of error in the forecasts. The sample size therefore is too small.

b. In addition to sample size challenges there appears to be no allowance for bias / desire in the questionnaire3. If asked, is your house overcrowded or are there people who want to move to their own accommodation in the next five years it is an easy option to say yes. I am sure if you sampled the broader LBE population you would get a similarly high proportion of yes responses to the same questions. In practice though we know it is unrealistic to base policy on 100% wish fulfilment rather than absolute need (cultural or otherwise).

c. My final point on the permanent pitch analysis is that whilst the starting point of is weak it becomes even weaker with the extrapolation beyond 20254. Again, it uses the small sample population to talk to average ages and then assumes 50% want to form a travelling household. That may be right but there is no persuasive evidence to back that up. Additionally, the demand prediction from “emerging” households uses 18 years old as the age that new accommodation is required. This does not feel like the right starting point in a world where c.50% of 23 years olds are still living at home (source: ONS).

d. In relation to the requirement for demand for 15 transit spaces this seems to be driven entirely from a small data set of unauthorized stopovers5 that suggests a range of 5-10 (Average 5.8) supplemented by conversations with the 14 survey respondents who suggested 12. This number then seems to have been rounded up in the 2024 update to 15. The only number that has any statistical relevance here is the average of 5.8 meaning there is a potentially significant over-estimate of the need.

It is acknowledged that the statistical analysis for this work is challenging and that the previous DCLG guidance has now been formally withdrawn. I presume as identified in the guidance6 this was because “sound” analysis is as a practical matter too challenging with a community that has low historic engagement in such processes.

1 Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2024 Update. Para 4.3 & 5.2

2 A Practical Guide to Sampling. National Audit Office p.8

3 Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2024 Update. Appendix A

4 Enfield Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2024 Update. Table 8.1

5 Gypsy and Traveller Accommodation Needs Assessment 2020 Update. Para 7.26-7.29

6 DCLG Gypsy and Traveller Accommodation Needs Assessments 2007 Update. Para 71-77

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

N/A

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I would be supportive of greater sampling to establish the real demand / need.

This sampling should be done with a more rigorous set of questions based more on real need as opposed to cultural preference. Given there is no legal obligation[1] to provide traveller accommodation any questionnaire should incorporate questions around the respondent's current status, intentions and alternatives not their preferences.

There is significant housing need in Enfield and positively all of the existing travelling community seem to have permanent accommodation already. The proposed pitches offer the best of every world (permanent bricks and mortar accommodation, plentiful allocated parking, dedicated play areas and the ability to travel at will potentially leaving such accommodation significantly under-utilised). It would not be a surprise that there is high demand for such facilities.

To my mind this combination of factors tends to favour one set of residents over another and thus is not fair. Correcting these biases in a fresh survey would lead to a sounder outcome.

From a residents (and tax-payers) perspective it is also amazing to me that these proposals which seem to generate paper, time and money have no connection to any financial plan or indeed legal obligation. What residents would really like to know is what these plans are likely to cost and if we provide them what will we not be able to do within LBE's available financial resources.

[1] Repealed by the Criminal Justice and Public Order Act 1994

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I made submissions at the Regulation 18 stage and they were not considered or even listed on the summary of responses received. It seems that only direct participation may be effective in ensuring my points are considered.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

4 Site Allocations

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 4 Site Allocations

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
  Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The selection of sites on four parcels of Green Belt / Metropolitan Open Land alongside the refusal to fully reconsider Meridian Water as an option mean that the analysis undertaken for the test of “exceptional circumstances” fails and is therefore not sound as well as contravening Planning Policy[1].

We are told that although Meridian Water aspires to be a mixed community the master plan, planning consents and funding make it unsuitable for a Traveller’s site without substantial risk to project viability and deliverability[2]. Respectfully, the Meridian Water development is already at risk, hence the appointment of Savills to undertake a strategic review of the council’s options. Additionally, of course it is disingenuous to say that planning consents, project viability and finances are the reason it cannot be considered. Enfield Council is Master Developer, Planning Control and Financier for the scheme and the GLA has a vested interest in both Meridian Water and the councils Travellers Plan.

The terms of Savills engagement have not been made public so it is unknown if their scope could have considered alternative options for the proposed Travellers sites. Of course, were the Meridian Water plans, Enfield Local Plan and Travellers Plan more closely aligned within a single process such options would be easier to evaluate.

It is not sound to press ahead with the Travellers plan as it stands without seeing the terms of reference and output from Savills work because it is impossible to assess properly that all other options have been considered[3].

It is also noted that two of the shortlisted sites are located close to existing residential properties (Bulls Cross and the Ridgeway). It does not seem fair to impose new development adjacent to these properties where the owners likely purchased them in part at least for the solitude offered by the protected open spaces that surround them.

Whilst the better solution would be to utilize some of the 85 hectares of land available at Meridian Water for the c.2 hectares of land required for the Travellers Sites (my estimate based on proposed site areas) the second-best option would be to consider them more fully as a part of the 286 hectare Crews Hill or 166 hectare Chase Park developments. Were the recently announced plans to create a new town to come to pass then such a development would also be appropriate to consider as potential Traveller sites. That way property buyers will be making conscious decisions with upfront knowledge of the Traveller site locations.

The final consideration of sites should be based around the addition of additional stress to already creaking infrastructure[4]. The site selection analysis makes it clear that existing access to healthcare, schools etc. is a relevant consideration. Sadly, these resources are insufficient today. There are regular 5+ hour waits at Chase Farm's minor injury clinic and most recently a new neighbour in Grange Park informs me that there were no Year 10 school places available within a five-mile radius of his home. Adding a population of young families on the Ridgeway for example would add unnecessary and increasing pressure in these areas.

[1] Policy Paper: Planning Policy for Travellers Sites (Updated 12th December 2024) Policy E: Traveller Sites in Green Belt

[2] Enfield Traveller Local Plan Site Selection Topic Paper – September 2025 p.12

[3] Exceptional Circumstances Topic Paper 2025 Para 2.36

[4] Policy Paper: Planning Policy for Travellers Sites (Updated 12th December 2024) Para 13.f

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

N/A

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In conclusion I would request that any decision on the location of Traveller Sites are put on hold until the Strategic Review terms are released and a judgement can be made as to whether Meridian Water could indeed be an option.

If after that analysis Meridian Water is still not considered an option the sites next to existing properties should be removed and the plans for Travellers sites should be rolled into the planning for Crews Hill / Chase Park / New Town

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I made submissions at the Regulation 18 stage and they were not considered or even listed on the summary of responses received. It seems that only direct participation may be effective in ensuring my points are considered.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 17 - Miss Tiffany Pantelli

Respondent: Miss Tiffany Pantelli

Submission Number:17

Submission Date:23/10/2025 08:40 BST

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Appendix B – Site Allocation Proforma: Site 2

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

There is an impact on our greenbelt, with increased traffic on The Ridgeway.

I have safety concerns about the nearby school bus stop.

This site has no essential services such as sewage, gas, electricity, running water and any upgrades to install these services would cause considerable disruption to the road / houses / school in the immediate area.

I don't believe the council has explored other options like brownfield and industrial sites in other parts of Enfield but believe there are viable alternatives that should be considered.

This site is not accessible to local shops, local schools or easy to travel from by public transport - there is only one bus route along this road.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 20 - Mrs Kerry Barlow

Respondent: Mrs Kerry Barlow

Submission Number:20

Submission Date:23/10/2025 14:13 BST

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to the Ridgeway (site 2)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The site indicated as site 2, The Ridgeway, is not suitable at all. I make the following observations for my reasoning:

This site is too small for the amount of static caravans you intend to put here, particularly as most have other vehicles and would need the room for parking.

This area lacks essential sewage and gas so not suitable at all. Any works that were to be undertaken to get this site suitable would cause a considerable amount of disruption to the area and neighbouring properties.

The Ridgeway itself has always been a fast road and there have been numerous accidents over the years on this road. The road is not considered as safe and a lot of commercial vehicles use this road to go to the nearby land fill. There is no camera in that particular spot and vehicles do not stick to the correct speed limit hence the amount of accidents.

The upheaval to the area if this were to take place is immense, not least because of the school situated nearby and the bus stop used by the pupils.

Finally, the impact to our green belt. There is no need to build here in this area, particularly when other brownfield sites have been identified. I also believe other sites could be looked into which would be more viable.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As above.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	

Adoption of Traveller Local Plan	✓

TLP19- 21 - Mrs Sandra Basaran

Respondent: Mrs Sandra Basaran

Submission Number:21

Submission Date:24/10/2025 16:13 BST

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site allocation, site 2 land adjacent to The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I do not support grounds for site selection 4.4 & 4.5 or ground 4.26 of exceptional the circumstances paper.

I do not consider the council has provided sufficient justification of an exceptional circumstance & I do not agree with removal of this land from Green Belt designation to meetthe needs of Enfield traveller local plan.

I do not consider all suitable brownfield and underutilised land has been properly considered to meet this need.

The council has only put forward a narrow list of council owned sites for initial consideration and has not explained why Land at Meridian Water cannot been allocated to meet the traveller plan needs.

The council argues that it would be inappropriate to allocate any land that is under consideration within the Enfield Local Plan (ELP) for the more pressing 5yr traveller provision, in case it later impacts future infrastructure required for the ELP.
In setting aside vast areas of land it has by its own admission 'inevitably limited' potential sites it has considered for the traveller plan. I feel this is not justified as if the traveller plan has an earlier date line it should take precedence over ELP. Future infrastructure can work around any allocated site as ELP itself is still in the planning stage.

The report endorses the fact that the green belt around this site makes strong contribution to. purpose 1&2 of the green belt.

The proposed site forms part of the band of green belt separating Enfield & Potters Bar which serves to prevent urban sprawl.

The site is also in a designated Archeological priority area.

The traveller consultation reported that representatives of the traveller community indicated a preference for a site closer to the border with Haringey.

This proposed site is itself unsuitable for the following reasons:

The location is isolated with no facilities at all within walking distance.

The site situated adjacent to a main road from M25 with a 50mph speed limit & heavy traffic, including iro 100 HGV's per day back & forth to

the nearby landfill site on The Ridgeway. This site already causes noise & mess nuisance to local residents.

The road speed & business makes this site a dangerous location both for pedestrians & unsupervised children, who could easily stray from designated play areas.

Vehicle access to & from the site as well as any Business activities conducted on site could

present further noise nuisance to existing residential dwellings close by.

The Site borders farmland, with no natural boundary to prevent any potential illegal

expansion onto adjoining land.

No utility/services currently exist on the site, meaning considerable disruption to road users & local residents to install services.

There is a risk of flooding at the site and the proposed development of Mobile homes would be more susceptible to flood damage.

This type of development, comprising mobile homes & touring caravans, is not in character with a green belt location where development aesthetics are usually strictly controlled.

Even if the site were taken out of the Green belt as is proposed, such development on this prominent site will be visible from the surrounding area and would spoil the openness of the Green belt. The surrounding area has undergone extensive efforts in re-forestation with new woodlands being planted and is widely enjoyed by walkers & cyclists as well as by motorists travelling into & out of Enfield who currently can enjoy wonderful views over largely uninterrupted countryside.

Enfield is known as a green & leafy market town and development such as this on a valuable Green belt site is not in keeping with the character of the Town.

The proposed site is prominent as it borders the main entry route from M25 into Enfield.

Currently this route offers views over undulating farmland and there are few if any comparable places in Enfield where locals & visitors alike may enjoy such picturesque landscape with wide open skies & beautiful sunsets.

Not all green space is of equal quality but as this is an area of unique beauty in Enfield it deserves to be protected from development for the benefit of future generations.

I believe there are plenty of lower quality sites that should be considered for development ahead of this proposed site.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 22 - Mr kevin Lynskey

Respondent: Mr kevin Lynskey

Submission Number:22

Submission Date:24/10/2025 17:56 BST

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Site Allocations – the issues:

TLP at cl. 4.2: it states

" … the Council explored all the available options for meeting these identified needs." Well, the Council are put to strict proof on this – have they considered ALL their sites?.

TLP At cl. 4.3 it states

" … All suitable Council owned land has been considered as part of this plan-making process,"

Hard to accept as, apart from large areas of London's Protected Green Belt, the Council own or control multiple Urban & Brownfield sites and none of these appear to have been put forward. There are major sites in Enfield that I can think of straightaway which should be considered,

For example:

1)Meridian Water – a scheme for 10,000 new homes & businesses over 25 years – there has to be room for a traveller site here and the site offers all of the criteria for:

Vehicular access, transport links (road & rail). The site offers good access to shops, health care, schooling and education facilities.

A carefully sited Gypsy/Traveller site with Sustainable drainage systems (SuDS) & surface water drainage design remove any flood issues.

2)Colosseum Retail Park (CRP) – CRP was CPO'd & the original residential planning permission has expired. At September 2025 in a document 'Enfield Local Plan Examination Response to 'Stage 2' Actions Note on Colosseum Retail Park' (19/09/2025) LBE have not decided what to do with this site

3)Sainsbury's, Crown Road, proposed for 868 new homes

4)Morrisons, Southbury Road, 646 homes

5)Southbury Leisure Park, 605 homes

These are locations with road, transport, health care, schooling and shops locally providing a perfect location(s) for one or more Gypsy/Traveller Site(s)

6)In addition to 1) to 5) above, consider

- Meridian Way 'corridor' covering Edmonton, Claverings Industrial Park, Innova Business Park, Lea Valley and Brimsdown
- Hertford Road 'corridor' from Edmonton through Ponders End, Enfield Wash and Freezywater

All have road, transport, health care, schooling and shops locally.

It seems illogical that the isolated Ridgeway Site 2 has been chosen in preference to other possibilities in the Borough. LBE state in the TLP that they have used the Gypsy and Traveller Site Selection Methodology (SSM) to select the subject Site 2. This document states at item cl. 2.5

" …. with specific reference to the criteria for assessing the locations of applications for Gypsy and Traveller sites" siting

- Vehicular access from the public highway … to ensure road safety for occupants and visitors;
- Visual amenity
- Good access to shops, health care, school and other education facilities;
- Site is not in an area at high risk of flooding
- The size of the site is appropriate to its local context, and in relation to the local infrastructure and population size and density.

On the basis of the above criteria,

- Ridgeway Site 2 is an isolated parcel of London's Green Belt land & all national planning policies state that there should be no development except in exceptional circumstances
- It is away from any shops, schooling, has no acceptable public transport, no rail connections, no health care and no accessible schooling
- There is one main road, the A1005 (The Ridgeway) linking the M25 (1.50 miles) and Enfield Town (3.90 miles). This is a fast (50mph) trunk road with heavy traffic and the suggested site access from Site 2 to this road is a very difficult and dangerous junction with blind access to view any northbound traffic,
- Site 2 at a minimum of 12 pitches, dwarfs the 5no isolated properties that currently exist adjacent to the site. It is larger than & out of context with the local population size
- Site 2 has few utility services, no gas, no mains sewage, no internet & poor water supply - very low on pressure
- The site may sit on higher ground but the local residents confirm the site floods and remains in a soft/boggy condition for most of the year.

TLP at cl. 4.5 it states

"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 …."

The Exceptional Circumstances Topic Paper of March 2024 states:

2.6 Government policy on the Green Belt is primarily set out in the National Planning Policy Framework (NPPF), the Planning Policy for Traveller Sites (updated December 2023) and the national Planning Practice Guidance (PPG).

2.7 At the heart of the NPPF is the presumption in favour of sustainable development. Sustainable development is that which best balances economic, social and environmental factors.

However, the NPPF clarifies this point at paragraph 9:

"9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"

The LBE statement in the TLP is misleading as it must be remembered that it is only IF 'Sustainable Development' exists that there could be a presumption in favour; the siting of a Gypsy & Traveller site at Ridgeway Site 2 is not sustainable development.

2.8 NPPF paragraph 11 explains what this means for plan-making.

"Plans are to promote sustainable patterns of development, meet the development needs of their area, align growth and infrastructure, improve the environment and mitigate and adapt to climate change. Strategic policies should, as a minimum, provide for the objectively assessed needs for housing and other uses …"

"For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination"

Policies upon which the LBE are relying in the TLP are from the NPPF in paragraphs 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11 and 135 and 139 of chapter 12.

These NPPF paragraphs cover:

1. should avoid isolated homes in the countryside – so Site 2 should be avoided and the design in no way enhances the immediate setting.
2. only if town centre sites are not available should out of centre sites be considered – many Town centre and edge of centre locations exist in the control of LBEand are available

1. States:

"The planning system should actively manage patterns of growth in support of these objectives……. development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making

At Site 2 there is no choice of transport modes – driving is the main option so increased emissions, poor health quality, there is no plan making to improve transport solutions.

1. Within the TLP for Site 2, there are

- no sustainable transport modes prioritized for the site,
- there is no safe and suitable access to the site .
- The has been no consideration given for parking nor on site access arrangements
- No consideration has been given for the significant impact this Site 2 will have on the local transport network nor for Highway safety that can be cost effectively mitigated.

1. There is limited availability of infrastructure and services at Site 2. The travel modes do not promote sustainable transport modes to limit car use, in fact they encourage it.

1. The TLP development at Site 2 will not

- Function well nor add to the overall quality of the area

- There will be nothing visually attractive in the design of pitches
- It is not sympathetic to local character and history
- It will not establish any sense of place by its arrangement or materials used
- There will be no ‘mix’ in its development nor support local of facilities as none are available

The TLP Site 2 fails on all aspects of these NPPF paragraphs requirements.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

[redacted]the Traveller Local Plan fails on most national policies.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. Traveller Local Plan - Notes 2.docx

TLP19- 23 - Mr Don Keane

Respondent: Mr Don KeaneD. F. Keane

Submission Number:23

Submission Date:27/10/2025 15:57 GMT

IIA

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

A10 Skate Park

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Further to my previous comments, please see the attached report.

In short, we have a right of way that has not been accounted for and results in the adoption of a proposal that is misleading regarding the status of the site access as it is based on inaccurate information.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Further to my previous comments, please see the attached report.

In short, we have a right of way that has not been accounted for and results in the adoption of a proposal that is misleading regarding the status of the site access as it is based on inaccurate information.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You must consider the plan in the light of this information, and your assessment should be based on the reality of the site access arrangement.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

It is our contention that Enfield Council have sought to push this proposal under the radar and we feel strongly that local stakeholders affected by this development **must** be considered.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. Cemetery House Response to Enfield TLP-Rev-C Assessment.pdf

TLP19- 24 - mr steven williams

Respondent: mr steven williams

Submission Number:24

Submission Date:28/10/2025 12:29 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

not a suitable location

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		✓

TLP19- 26 - Anna Woodcock

Respondent: Anna Woodcock

Submission Number:26

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

As a resident of Edmonton I am opposed to the plans of the skatepark being turned into a travelers/transit site as it is one of the few places left for the young generation and teenagers to participate in skateboarding, BMX biking and also to meet and greet and socialize with each other rather than walking the streets and causing trouble.

Most places like ten pin bowling cost money and parents can not afford this i.e. (most sports cost money) There is nothing free for the young of today anymore.

Why cant this travelers site be done in Enfield's green spaces.

It seems that most residents In Edmonton feel they are the poor relations to Enfield. I am greatly opposed to this.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-26.pdf

TLP19- 27 - B Williams

Respondent: B Williams

Submission Number:27

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am sending this letter concerning this outrageous proposal where children schools are everywhere and the space just by the road side of A10. It is unimaginable that our council is becoming used for creating what do not benefit the residence and will be causing traffic congestion. Moreso the park that the young minority or vulnerable are using to create a community is being targeted again by Enfield Council. Every experiment seems to be in Edmonton. Traffic experiment with parking in on the road space was experimented in Edmonton. It is the poor zone of Enfield now, so those Enfield proposal like this is an example of how Enfield labour are treating Edmonton. No different as the shaming of this country by actions and worthless policies.

My question is, is the council trying to turn Edmonton to a downgraded area. Traveller Transit Site are usually created where there is enough space fot vehicle turning or manoeuvre. This proposal lacks risk assessment, consultation with residence often have no balance because some attendees are not from different work of life to bring experience. Same with bicycle lanes that one bicycle an hour and possible do not even use the cycle lane. The negative effect of this proposal is massive and should not go on.

Leaving in Enfield/ Edmonton for 26yrs seeing some unimaginable unthoughtful changes by council that do not make sense to a lot of residence but they have no time to communicate to the council. Put the money into keeping Edmonton clean and healthy, a lot of poverty due to taxing on parking spaces here and there, council tax expenses and a lot of wastage by our council with no proper accountability. Workers feeding through foodbank and yet all revenue not enough to have free food in all schools and free regretional spaces for residence.

Stop targeting Edmonton for experimenting policies that burden the people.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-27.pdf

TLP19- 28 - Burkhard Gravis

Respondent: Burkhard Gravis

Submission Number:28

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Just received leaflet re Enfield Council proposal to place a travellers site on the skate park facility next to Church Street Edmonton Cemetery, which I am totally opposed to as bearing in mind the land is a recreation Space as MOL Metropolitan Open Land and next to a Cemetery.

Added to which Friends of the skate Park have a plan to invest on the facility to improve the site should make the Council understand the importance of the facility.

If need be will contact Sport England have copied London Marathon in as they are a big player in investing in Sports Facilities, as a Council you should be supporting facilities for Sport and the wellbeing of Edmonton[redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-28.pdf

TLP19- 29 - Francesca Cammarota

Respondent: Francesca Cammarota

Submission Number:29

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to express my strong opposition to the proposal to turn the local Skatepark next to Church Street into a traveller transit site. The Skatepark is a vital community asset that provides a safe, positive, and inclusive space for local young people and families. It promotes healthy activity, fosters community engagement, and helps keep antisocial behaviour at bay. Removing this facility would be a significant loss to the area and send a damaging message about how little regard the council has for local residents' priorities.

I am not opposed to fair solutions for traveller accommodation, but placing a transit site in place of a valued public space—particularly one used heavily by youth—is entirely inappropriate.

[redacted]

Please do not allow this short-sighted plan to move forward. Protect our community space

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-29.pdf

TLP19- 30 - J D Stanford

Respondent: J D Stanford

Submission Number:30

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe traveller sites are needed within the borough but the one on the A10 I believe would be a traffic hazard entering the site from the A10. If that is the proposal would cause I believe major disruptions to traffic travellers have large caravans and to get them in and out of that site Unless there is a slip road into the site I believe would be an absolute disaster and on a less serious note, I don't believe it's appropriate for a site to be next to a cemetery not good for the travellers and not good for the people using the cemetery and if the new crematorium gets built opposite This would cause even more congestion

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-30.pdf

TLP19- 31 - Jay Lamiv

Respondent: Jay Lamiv

Submission Number:31

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to formally express my strong objection to the proposed travellers' resting site intended for caravan use on land off the A10.

[redacted]

[redacted]While I fully support the need for inclusive and lawful solutions for all groups, I strongly believe that this proposed location is unsuitable — both due to its proximity to residential areas and its impact on the safety and wellbeing of local residents.

I urge you to consider the concerns of your constituents and oppose this proposal. Alternative locations with appropriate infrastructure, management, and oversight should be considered instead. Please keep me informed about the progress of this matter, and how public feedback will be taken into account in the decision-making process.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	

Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-31.pdf

TLP19- 33 - Lorrell Shirley

Respondent: Lorrell Shirley

Submission Number:33

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted]

Last time we checked this space is protected under MOL. Young people need a space to be about to express themselves and be creative in a positive manner. You invest in you - you invest in the future. Find somewhere else.

We passionately oppose this decision.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-33.pdf

TLP19- 34 - Maija Tjarve

Respondent: Maija Tjarve

Submission Number:34

Submission Date:30/10/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the Regulation 19 consultation on the Traveller Local Plan 2020–2041. While I support the need to plan for all communities within Enfield, I wish to object to the specific allocation of Sites 1 (Bulls Cross Nursery), Site 2 (Land adjacent to Ridgeway), and Site 3 (Land at A10), on the following grounds:

1. Unsoundness: Green Belt and Metropolitan Open Land Release – Sites 1 and 2 lie within the Green Belt. National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances, and only when no reasonable alternatives exist. Site 3 lies within Metropolitan Open Land, which has the same level of protection as Green Belt. The Council has not adequately demonstrated that all alternatives, such as brownfield land, surplus employment land, or other non-designated land, have been exhausted before proposing to release these highly protected sites.

2. Conflict with Local and National Policy – The National Planning Policy Framework requires Green Belt to be protected except in “very special circumstances.” Traveller site provision is important, but it does not in itself constitute justification for irreversible Green Belt loss. The London Plan emphasises protecting MOL and heritage assets, and these allocations (particularly Bulls Cross near Forty Hill Conservation Area and Myddelton House gardens) directly conflict with that aim.

3. Infrastructure and Accessibility Concerns – Sites 1 and 2 have poor Public Transport Accessibility Levels (PTAL 0–1a), contrary to the Plan's stated aim of ensuring sites are in sustainable, accessible locations. This will lead to car dependency, congestion, and safety risks. Site 3 raises highway safety concerns due to its location on a busy arterial road and proximity to sensitive community uses such as the cemetery and sports fields.

4. Loss of Community Facilities – The A10 site currently accommodates Edmonton Skate Park, which is a valued local facility [redacted]. Relocating it may not adequately replace the loss of open space, contrary to policies protecting community and recreational facilities.

5. Failure of Duty to Cooperate and Site Selection Process – The Plan acknowledges that neighbouring boroughs were approached but does not evidence genuine joint working to distribute need across boundaries, as required under the Duty to Cooperate. The site selection process appears limited, focusing almost exclusively on Council-owned land. This narrow approach risks being considered inadequate in demonstrating that reasonable alternatives were fully explored.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Request – Given the above concerns, I respectfully request that Enfield Council withdraw the allocations of Sites 1, 2, and 3, reconsider less harmful alternatives focusing on brownfield land and non-Green Belt/MOL sites, and strengthen the evidence base for site selection to ensure compliance with the NPPF and London Plan.

Conclusion – For the reasons set out above, I consider the current Submission Draft Plan to be unsound (not justified, not consistent with national policy, and not effective). I therefore object to the allocation of the above sites and urge the Council to amend the Plan before submission to the Secretary of State.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-34.pdf

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan

A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the Regulation 19 consultation on the Traveller Local Plan 2020–2041. While I support the need to plan for all communities within Enfield, I wish to object to the specific allocation of Sites 1 (Bulls Cross Nursery), Site 2 (Land adjacent to Ridgeway), and Site 3 (Land at A10), on the following grounds:

1. Unsoundness: Green Belt and Metropolitan Open Land Release – Sites 1 and 2 lie within the Green Belt. National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances, and only when no reasonable alternatives exist. Site 3 lies within Metropolitan Open Land, which has the same level of protection as Green Belt. The Council has not adequately demonstrated that all alternatives, such as brownfield land, surplus employment land, or other non-designated land, have been exhausted before proposing to release these highly protected sites.

2. Conflict with Local and National Policy – The National Planning Policy Framework requires Green Belt to be protected except in "very special circumstances." Traveller site provision is important, but it does not in itself constitute justification for irreversible Green Belt loss. The London Plan emphasises protecting MOL and heritage assets, and these allocations (particularly Bulls Cross near Forty Hill Conservation Area and Myddelton House gardens) directly conflict with that aim.

3. Infrastructure and Accessibility Concerns – Sites 1 and 2 have poor Public Transport Accessibility Levels (PTAL 0–1a), contrary to the Plan's stated aim of ensuring sites are in sustainable, accessible locations. This will lead to car dependency, congestion, and safety risks. Site 3 raises highway safety concerns due to its location on a busy arterial road and proximity to sensitive community uses such as the cemetery and sports fields.

4. Loss of Community Facilities – The A10 site currently accommodates Edmonton Skate Park, which is a valued local facility [redacted]. Relocating it may not adequately replace the loss of open space, contrary to policies protecting community and recreational facilities.

5. Failure of Duty to Cooperate and Site Selection Process – The Plan acknowledges that neighbouring boroughs were approached but does not evidence genuine joint working to distribute need across boundaries, as required under the Duty to Cooperate. The site selection process appears limited, focusing almost exclusively on Council-owned land. This narrow approach risks being considered inadequate in demonstrating that reasonable alternatives were fully explored.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Request – Given the above concerns, I respectfully request that Enfield Council withdraw the allocations of Sites 1, 2, and 3, reconsider less harmful alternatives focusing on brownfield land and non-Green Belt/MOL sites, and strengthen the evidence base for site selection to ensure compliance with the NPPF and London Plan.

Conclusion – For the reasons set out above, I consider the current Submission Draft Plan to be unsound (not justified, not consistent with national policy, and not effective). I therefore object to the allocation of the above sites and urge the Council to amend the Plan before submission to the Secretary of State.

Land at A10 (Site 3)

Comment Number: 4

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the Regulation 19 consultation on the Traveller Local Plan 2020–2041. While I support the need to plan for all communities within Enfield, I wish to object to the specific allocation of Sites 1 (Bulls Cross Nursery), Site 2 (Land adjacent to Ridgeway), and Site 3 (Land at A10), on the following grounds:

1. Unsoundness: Green Belt and Metropolitan Open Land Release – Sites 1 and 2 lie within the Green Belt. National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances, and only when no reasonable alternatives exist. Site 3 lies within Metropolitan Open Land, which has the same level of protection as Green Belt. The Council has not adequately demonstrated that all alternatives, such as brownfield land, surplus employment land, or other non-designated land, have been exhausted before proposing to release these highly protected sites.

2. Conflict with Local and National Policy – The National Planning Policy Framework requires Green Belt to be protected except in “very special circumstances.” Traveller site provision is important, but it does not in itself constitute justification for irreversible Green Belt loss. The London Plan emphasises protecting MOL and heritage assets, and these allocations (particularly Bulls Cross near Forty Hill Conservation Area and Myddelton House gardens) directly conflict with that aim.

3. Infrastructure and Accessibility Concerns – Sites 1 and 2 have poor Public Transport Accessibility Levels (PTAL 0–1a), contrary to the Plan's stated aim of ensuring sites are in sustainable, accessible locations. This will lead to car dependency, congestion, and safety risks. Site 3 raises highway safety concerns due to its location on a busy arterial road and proximity to sensitive community uses such as the cemetery and sports fields.

4. Loss of Community Facilities – The A10 site currently accommodates Edmonton Skate Park, which is a valued local facility [redacted]. Relocating it may not adequately replace the loss of open space, contrary to policies protecting community and recreational facilities.

5. Failure of Duty to Cooperate and Site Selection Process – The Plan acknowledges that neighbouring boroughs were approached but does not evidence genuine joint working to distribute need across boundaries, as required under the Duty to Cooperate. The site selection process appears limited, focusing almost exclusively on Council-owned land. This narrow approach risks being considered inadequate in demonstrating that reasonable alternatives were fully explored.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Request – Given the above concerns, I respectfully request that Enfield Council withdraw the allocations of Sites 1, 2, and 3, reconsider less harmful alternatives focusing on brownfield land and non-Green Belt/MOL sites, and strengthen the evidence base for site selection to ensure compliance with the NPPF and London Plan.

Conclusion – For the reasons set out above, I consider the current Submission Draft Plan to be unsound (not justified, not consistent with national policy, and not effective). I therefore object to the allocation of the above sites and urge the Council to amend the Plan before submission to the Secretary of State.

TLP19- 36 - Mark Griffin

Respondent: Mark Griffin

Submission Number:36

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I'd like to comment on the draft traveller local plan, more specifically, the transit site proposed for the

A10 on the existing skatepark:

1) I feel its highly likely to become a permanent occupation site (& not a transit site) because the plan admits even with all these extra spaces proposed here & at the two other permanent sites, it will not cover need.

2) Apart from the obvious risks of accessing the site from the A10 with a lumbering caravan (which I feel is a road danger), the site is entirely unsuited to the look & feel of the area, quite close to the beautiful Firs Farm Wetlands.

3) This site is by the Edmonton cemetery & many suburban housing estates; [redacted]

4) I do not think this proposal is acceptable in such a density residential area; far better to use some of the space around the Enfield incinerator plant, that's not near any houses & thus, less likely to attract negative responses.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-36.pdf

TLP19- 37 - Mary Koullapis

Respondent: Mary Koullapis

Submission Number:37

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted] use the skatepark and so do so many other youngsters. You are planning to take something away from these young people to make space for travellers? [redacted] You have taken away the tennis courts to make way for more cemetery space - [redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-37.pdf

TLP19- 38 - Phillipa Wright

Respondent: Phillipa Wright

Submission Number:38

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

It has come to my attention that there are plans in place for the skatepark next to the Church Street Edmonton Cemetery to be turned into a traveller site.

I would like to raise my opposition to these plans. This is already an area of significant congestion, problems with the cleansing of the streets and general deprivation. There is not the infrastructure in place for the proposed developments, as there are so many issues which are not currently being addressed, without adding to them.

This development should be considered in a space where the area around it has what it needs, and not an area where additional costs are added to it, that will not be met.

I hope careful consideration will be given to these proposals, as this is not the right space for them.

TLP19- 39 - Cllr Reece Fox

Respondent: Cllr Reece Fox

Submission Number:39

Submission Date:30/10/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to formally object to the inclusion of the Bulls Cross site as a proposed Traveller site in the dra Enfield Traveller Local Plan, currently out for consulta on (24 September – 5 November 2025).

Reason for Objection:

Unsuitability of the Site: Bulls Cross is located within a designated conservation area, recognized for its historic significance, unique character, and valuable green open spaces. Allocating this site for Traveller accommodation would undermine the conservation objectives and heritage protect on policies of the Council's Local Plan and national planning guidance. The site is also isolated by the A10 from shops and amenities, and is close to busy roads that are prone to conges on. The nearest overground sta on is a 15 minute walk away at Turkey Street and on the other side of the A10. The access and egress into the site is also challenging, and it is adjacent to school playing fields, which may cause noise and disturbance to travellers who wish to enjoy the quiet amenity of their homes.

Conflict with Heritage and Environmental Policies: The proposal conflicts with both local and national planning policies that aim to preserve heritage assets and protect green infrastructure. The development of a Traveller site at Bulls Cross risks harm to the area's historic environment and landscape character.

Lack of Appropriate Alternative Assessments: The draft plan does not provide sufficient evidence that alternative sites have been adequately considered. The selection of Bulls Cross appears inconsistent with the strategic aim of minimizing impacts on protected areas. Conclusion and Suggested Modification: To ensure the plan is sound and legally compliant, I urge the Council to remove Bulls Cross from the list of proposed Traveller sites. The Council should instead identify and allocate sites that do not compromise designated conservation areas or protected green spaces, thereby aligning with local and national planning policies. I respectfully request that this representation be taken into account in the Traveller Local Plan.

TLP19- 40 - Roberta Lavelle

Respondent: Roberta Lavelle

Submission Number:40

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I recently attended The ridge library for the consultation of the skate park being used for the travelling community. Not only is this a sight that young people have used to gather and learn new skills plus build new friendships along the way. The skate park has brought young people together from different corners of the brought, integrating people from different backgrounds but with the same interests. This is a free sight and is needed now more than ever. I feel this area is so deprived of activities for the young people to go as we have lost youth clubs / youth workers. With the ever rising cost of physical sports out of reach for most families in this area, i fill it would be most depremental to local young people.

I also believe that this is not a suitable site for people to live as the proximity to the A 10 could be dangerous to young children playing and animals that may not be on a lead (dog's).As the lay out of the road is a dual carriage, I believe that any emergency service attending this sight would have to go down to
the roundabout, passing the sight to then be on the right side of the road, which would delay any help that might be needed.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-40.pdf

TLP19- 41 - Sue Reiss

Respondent: Sue ReissSecretary Weir Hall

Submission Number:41

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Our behalf of our members we oppose the loss of the skatepark on the A10.

This is an ideal location for the skate park, as it is easily accessible by public transport and users feel safe because it is a busy area.

If the decision is made to relocate it, it must be in an equally visible area and not hidden away in a park or such like, where the users would be much more vulnerable.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-41.pdf

TLP19- 42 - Suzy Godfrey

Respondent: Suzy Godfrey

Submission Number:42

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Disappointed to note that the skate park along the A10 is earmarked for change of use. There are 2 other permanent sites earmarked for travellers, which are unused, vacant properties. The proposed transit site on the A10 is currently used by local youth and families for skateboarding, roller-skates and bicycles, with purpose built ramps enabling skills to be developed and fun times to be shared. I regularly drive along the A10 and see them enjoying themselves, which is preferable to getting into trouble through boredom and lack of opportunities. It is also encouraging to see young people taking part in physical exercise which is so good for physical and mental health. Is there a relocation site for the Skate Park?

It doesn’t make sense to take away this amenity for children and young people just as skateboarding has been recognised as an Olympic sport.

Surely another traveller transit site can be identified. The old B&Q site on the A10 is still unused and the land by the River Lea, accessible from the North Circular and Meridian Way, has not yet been fully developed.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-42.pdf

TLP19- 43 - William Clarke

Respondent: William Clarke

Submission Number:43

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted]and was wondering how I could contribute to having the skatepark saved.

[redacted] local skatepark was going to get changed to a Traveller transit site, I'm writing this email in hopes that you continue your efforts to save our local skatepark and was wondering if there was any way I could help as I'm very passionate about this subject.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-43.pdf

TLP19- 44 - David Wilson

Respondent: David WilsonThames Water

Submission Number:44

Submission Date:30/10/2025 09:00 GMT

Policy TLP2 Design and Site Layout

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Policy TLP2 Design and Site Layout

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We support the reference to wastewater infrastructure in Policy TLP 2 (16) of the TLP, but consider that this should be strengthened and also cover water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2024, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development,
and make sufficient provision for… infrastructure for waste management, water supply, wastewater…"

Paragraph 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure…"

Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is
necessary…."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
• The surface water drainage requirements and flood risk of the development both on and off site and can it be met;
• The developments demand for water supply infrastructure.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at:
https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity

In light of the above comments and Government guidance we consider that the DPD should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text (see below)
Water Efficiency/Sustainable Design
The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
https://www.thameswater.co.uk/Be-water-smart
It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method,
did not achieve the intended water performance levels.

Comments in Relation to Flood Risk and Sustainable Drainage Systems

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage we support the reference in Policy GT3 viii), but consider that this should be strengthened. It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

"Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Proposed water efficiency text:
"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

Proposed Drainage Text:

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Local Plan ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

Also to mitigate flood risk both on and off-site: ***"surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha)."*** in line with CIRIA guidance.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Appendix B – Site Allocation Proforma: Site 1

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	

Complies with the duty to co-operate

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-44 (1 of 3).pdf
2. TLP19-44 (2 of 3).pdf
3. TLP19-44 (3 of 3).pdf

Appendix B – Site Allocation Proforma: Site 2

Comment Number: 4

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-44 (1 of 3).pdf
2. TLP19-44 (2 of 3).pdf
3. TLP19-44 (3 of 3).pdf

Appendix B – Site Allocation Proforma: Site 3

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective

* Not consistent with national policy

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-44 (1 of 3).pdf
2. TLP19-44 (2 of 3).pdf
3. TLP19-44 (3 of 3).pdf

TLP19- 45 - Edward Smith

Respondent: Edward SmithConservative Group

Submission Number:45

Submission Date:30/10/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 4: Site Allocations, Appendix B. Site 2, Land adjacent to Ridgeway (Site 2). Para. 4.12 – 4.18.

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The site location is not sustainable on economic, social and environmental grounds. The site is located in the Green Belt. Inappropriate development such as this should not be approved except in very special circumstances. Government planning policy for Traveller sites deems that unmet need is unlikely to outweigh the harm of such development to the character, quality and bio-diversity of the Green Belt.

The site is remote from shops, schools and health services and is unlikely to promote co-existence with the local community. It would have poor connectivity with public transport to local shopping centres and these other facilities. The site is a narrow and triangular shape in conflict with government guidance that the preferred shape is circular or a horseshoe arrangement. The site is not large enough to comfortably accommodate 12 caravans/mobile homes with space for two cars and storage areas.

The proposed site is located next to The Ridgeway, a busy 50mph A road leading to the M25. The traffic situation is made worse by the daily volume of heavy lorries using the road bringing building spoil for the bunding works on nearby Holly Hill Farm. Entry and egress to the proposed site by slow moving caravans/mobile homes would be dangerous and a traffic hazard.

The Traveller community is lukewarm about the site for the reasons above and would have preferred an alternative site such as The Dell opposite Enfield Crematorium on the Great Cambridge Road. This better located council owned site was rejected by the Council on the weak grounds that it had been included as a provisional site for housing in the Enfield Local Plan. The Meridian Water site should also have been given greater consideration.

This site, although in open countryside is adjacent to several houses [redacted]

The Council would face very high costs for the infrastructure required to provide drainage, electricity and other services given the site's remote location.

The Environmental Agency has highlighted the flood risk to the site, which it considers the council has under-estimated. Caravan and mobile homes are particularly vulnerable to damage from flooding.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I am a councillor for Ridgeway Ward and I wish to represent the concerns of my constituents, many of whom oppose this proposed site.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-45 1 of 2.pdf
2. TLP19-45 2 of 2.pdf

TLP19- 46 - D Bartripp

Respondent: D Bartripp

Submission Number:46

Submission Date:30/10/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted]

vans and caravans making the A10 even more dangerous, entering and exiting the site would make the A10 even more hazardous.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-46.pdf

TLP19- 47 - Mrs Pamela Foord

Respondent: Mrs Pamela Foord

Submission Number:47

Submission Date:31/10/2025 18:11 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site 2, land adjoining The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to oppose the planned development on the selected site 2 at The Ridgeway and to plans for land to be removed from Green belt designation for the purpose of meeting The Enfield Traveller plan.

I do not agree that there is a case for exceptional circumstances or that Enfield council has fully considered all brownfield & underutilised alternative land. The council has not justified why land cannot been allocated at Meridian Waters to meet this need.
The Ridgeway site serves the Green Belt purpose well, forming part of a band of green belt land separating Enfield from Potters Bar & Cockfosters.
The area offers unrivalled views over rolling farmland which would be spoiled if these plans go ahead.

The type of development that is proposed at the site is not suitable for a site in a Green belt location.

Existing residents in the surrounding area are prohibited by covenants on the land, for very good reason, from siting mobile homes or keeping touring caravans. The site is wholly unsuited to this type of development.

The site occupies a prominent position in the landscape and so deserves to retain Green Belt protections as development here will impact views from the surrounding area.

The site is isolated, with no facilities on site or within walking distance. The site borders a very busy road with a 50mph speed limit.
The Ridgeway has narrow footpaths at this point and is dangerous for pedestrians & for young families and an unsuitable location for a residential development of this nature.

Any development would cause further traffic congestion while underway and worsen traffic in a location which already suffers from heavy HGV traffic on the surrounding roads, both along The Ridgeway and the M25.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report		✓
Adoption of Traveller Local Plan		✓

TLP19- 48 - Mr Erhan Basaran

Respondent: Mr Erhan Basaran

Submission Number:48

Submission Date:31/10/2025 22:51 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site 2, Land adjacent to The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Objection to use of Green Belt Land for proposed Traveller Site:

I strongly oppose the proposal to remove Green Belt protection from the site referenced in grounds and see no justification for an exceptional circumstances.

The Council hasn't shown clear or exceptional reasons to justify this.

I also don't believe all available brownfield or underused land has been properly considered. It seems only put forward a few Council-owned sites to be looked at with no explanation on why land at Meridian Water couldn't be used instead of green belt land.

The argument that land was not included because it might affect the future Enfield Local Plan doesn't make sense when The 5year Traveller Plan is a more immediate need & should take priority. The ELP is still in development and can be tailored.

The Ridgeway site forms part of the important segment of Green Belt that stops Enfield and Potters Bar merging together.

The site is in an Archaeological Priority Area.

Representatives from traveller communities have said they prefer somewhere closer to Haringey.

The site itself is unsuitable because:

- It's isolated with no facilities on site & no local services nearby
- It's right next to a 50mph main road with lots of heavy traffic.
- It's an unsafe location for small children and pedestrians.
- It would cause extra noise and traffic for nearby homes.
- The development & installation of services would be highly disruptive.
- The site could be prone to floods, which makes it a poor location for mobile homes.
- mobile homes & caravans are not a suitable type of development for this Green belt location.

This area is a valued green space enjoyed by residents, cyclists, and walkers, and it provides beautiful open views when entering Enfield. Building here would spoil that landscape permanently. The rural character of the area would be damaged by this kind of development.

Please protect this land and choose a more appropriate site—there are plenty of less sensitive options elsewhere

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓	
Start of the examination		✓
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 49 - Mrs Gillie Christou

Respondent: Mrs Gillie Christou

Submission Number:49

Submission Date:01/11/2025 08:38 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Thank you for the opportunity to comment. Thank you too for arranging a local event with planning officers. I learnt a lot at that meeting. Not least that there are 3 travellers sites proposed. It is such a shame that as a council you do not take more opportunities to brief the public thoroughly. Mostly, what we learn about developments is through social media and word of mouth. The

information I learnt and did not change my view and I remain in opposition to the plan. I wish to register my dismay at the proposal. Who in there right mind would put a travellers site on the side of the A10. A dangerous move for vehicles moving in and out of the site, not to mention the increase in numbers of children and adults using the junction for crossing at the Church Street/A10 junction. It would be an accident waiting to happen and will further burden an already very busy junction. I now understand that this is a transit site. This could mean a very regular flow of vehicles in and out of the site. Apart from the traffic safety issue, there is also the issue of pollution in the air for the travellers residing on the site. It is so close to a very busy road, the air cannot be good and will impact on all travellers, but particularly children and the elderly. In addition it is only a small site. It will only accommodate a handful of caravans and families. I understand that potentially 15 caravans, plus cars and other structures are planned for the site. That would mean at least 30 people living on the site and most probably considerably more if families are involved. The site does not look big enough to me for this amount and in any case why make a major change for a relatively small number. Surely there are bigger sites which truly could accommodate that number and more. Another objection I have is that you will be destroying a valuable community resource - the skate park. Why take away the enjoyment of our children and young people. It provides them with valuable leisure and exercise opportunities and also keeps them occupied. I understand that there are plans to relocate the skate park. Would this ever happen? And even if it did, it would take a long time and in the meantime there wouldn't be a skate park. Also it has been in this location for a very long time. People feel a strong connection to it and don't want it moved. There must be a more appropriate site for the travellers site. Meridian Water comes to mind, where there is a vast amount of land with good road and train access. Finally, the police would have difficulty getting to the site. If coming from Edmonton they would have to go via the Cambridge Roundabout in order to access the north bound carriage of the A10. The same would apply to other emergency services vehicles. Please re-consider this proposal.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Put it in a more sensible site, which does not destroy a valuable community resource. And a site which does not endanger people's lives by putting the site on the side of a major road.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	**No**
Submission of the Plan		

Start of the examination	
Schedule of Main modifications stage (following hearings)	
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	

TLP19- 50 - Mr tom Basaran

Respondent: Mr tom Basaran

Submission Number:50

Submission Date:02/11/2025 20:08 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land Adjacent to The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I'm writing as a concerned Enfield resident to express my strong opposition to the proposed Traveller site at The Ridgeway. Removing Green Belt protection from this land would be a serious mistake, and I can't see any valid reason or exceptional circumstance to justify it.

It really doesn't look like the Council has properly explored all other options. Many brownfield and underused sites around the borough haven't been fairly considered, and it feels like only a narrow range of Council-owned plots were looked at. Why can't Meridian Water or similar sites be used instead, rather than destroying more of our precious green space?

The argument that this can't go ahead because it might affect the future Enfield Local Plan doesn't make sense. The Traveller Plan is a more immediate need, and the Local Plan can easily be shaped around it once it's finalised.

The Ridgeway is part of a vital stretch of Green Belt that stops Enfield from merging into Potters Bar — something local people have fought hard to preserve. The area also sits within an Archaeological Priority Area, making it even more inappropriate for this kind of development.

Even the Traveller community representatives have said they would prefer a location nearer to Haringey, where facilities and services are easier to reach.

On top of that, the site itself is completely unsuitable:

- It's remote and has no nearby shops, schools, or medical facilities.
- The road beside it is 50mph with heavy traffic and narrow, overgrown pavements — a real danger to pedestrians and children.
- The noise and extra traffic would badly affect nearby residents.
- Building and installing utilities here would cause major disruption.
- The land could flood, making it unsafe for mobile homes.
- The area has covenants that prohibit caravans, reflecting its long-standing protection as part of the Green Belt.

Locals love this stretch of countryside — it's used daily by walkers, cyclists, and families. It offers beautiful open views and gives a sense of space as you enter Enfield. Once built on, that beauty is gone forever.

Please, protect The Ridgeway and keep this part of Enfield green and open for future generations. There are far better places to create a Traveller site that don't involve sacrificing protected land.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 51 - Mr Barry Foord

Respondent: Mr Barry Foord

Submission Number:51

Submission Date:02/11/2025 20:41 GMT

4 Site Allocations

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site Adjacent to The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Objection to development of Green Belt Land for Traveller Site:

I oppose the removal of Green Belt protection from the selected site adjacent to The Ridgeway.

I do not agree there are sufficient grounds for an exceptional circumstance as it is clear that all available brownfield and under utilised land have been considered before building in the green belt.

It is also unclear why land at Meridian Water hasn't been allocated for an Traveller site l, instead of this green belt land.

Enfield Council have unnecessarily excluded all land which is under consideration for Local Plan. This cannot be justified when the Traveller Plan is a more urgent need.
The ELP is still in development so could be worked around any traveller site.

The Ridgeway site forms part of an important segment of Green Belt that separates LBE from Herts, preventing urban sprawl. The land in this area fulfils the exact purpose of why the Green belt was created.

The proposed site is in an Archaeological Priority Area.

In consultations, representatives from the traveller community have expressed a preference for alternative locations.

There are several reasons this site is unsuitable:

The proposed site is in an isolated location. There are no facilities on site & installing these will cause disruption to road users & local residents

There are no amenities near this site.

The site borders onto a 50mph main road with heavy traffic & the road has narrow/overgrown pavements.

This is an unsafe location for small children and for pedestrians.

The site may be at increased risk of flooding, making it a poor choice for a mobile home & caravan park.

A mobile home park is not a suitable development in the Green belt.

Land in this location is subject to restrictive covenants that prohibit large caravans due to the character of the green belt. This rule should be upheld to preserve the openness & character or the green belt.

This site is set within valuable green space with wide open views on the gateway to Enfield. Development would be detrimental to the open rural landscape.

This Green belt land should be preserved for future generations. A more appropriate brownfield site elsewhere in the borough should be selected to meet the traveller accommodation need.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report		✓
Adoption of Traveller Local Plan		✓

Land adjacent to Ridgeway (Site 2)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site Adjacent to The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Objection to development of Green Belt Land for Traveller Site:

I oppose the removal of Green Belt protection from the selected site adjacent to The Ridgeway.

I do not agree there are sufficient grounds for an exceptional circumstance as it is clear that all available brownfield and under utilised land have been considered before building in the green belt.

It is also unclear why land at Meridian Water hasn't been allocated for an Traveller site l, instead of this green belt land.

Enfield Council have unnecessarily excluded all land which is under consideration for Local Plan. This cannot be justified when the Traveller Plan is a more urgent need.
The ELP is still in development so could be worked around any traveller site.

The Ridgeway site forms part of an important segment of Green Belt that separates LBE from Herts, preventing urban sprawl. The land in this area fulfils the exact purpose of why the Green belt was created.

The proposed site is in an Archaeological Priority Area.

In consultations, representatives from the traveller community have expressed a preference for alternative locations.

There are several reasons this site is unsuitable:

The proposed site is in an isolated location. There are no facilities on site & installing these will cause disruption to road users & local residents

There are no amenities near this site.

The site borders onto a 50mph main road with heavy traffic & the road has narrow/overgrown pavements.

This is an unsafe location for small children and for pedestrians.

The site may be at increased risk of flooding, making it a poor choice for a mobile home & caravan park.

A mobile home park is not a suitable development in the Green belt.

Land in this location is subject to restrictive covenants that prohibit large caravans due to the character of the green belt. This rule should be upheld to preserve the openness & character or the green belt.

This site is set within valuable green space with wide open views on the gateway to Enfield. Development would be detrimental to the open rural landscape.

This Green belt land should be preserved for future generations. A more appropriate brownfield site elsewhere in the borough should be selected to meet the traveller accommodation need.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report		✓
Adoption of Traveller Local Plan		✓

TLP19- 52 - Mr Andy M

Respondent: Mr Andy M

Submission Number:52

Submission Date:02/11/2025 21:10 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Inadequate consultation under Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Many residents in the affected areas were unaware of the consultation process or were given insufficient information about the potential impacts on road safety, environmental conditions, and local services. This lack of transparency undermines the Council's legal obligation to engage all stakeholders meaningfully and fairly.The site selection process lacks transparency and rigour.

There is no clear explanation of why certain sites were preferred or discounted. The Sustainability Appraisal fails to demonstrate that reasonable alternatives were properly considered, particularly in relation to accessibility, environmental constraints, and the integration of Traveller sites with existing communities.

Insufficient evidence regarding site suitability and safety:

The Council has failed to demonstrate that the proposed Traveller sites near or adjacent to the A10 are suitable or safe. The A10 is a heavily trafficked dual carriageway with a long record of serious and fatal accidents, poor pedestrian access, and limited emergency stopping points. Locating residential pitches close to such a hazardous route exposes both residents of the site and existing road users to significant risk. No adequate transport assessment, highway safety audit, or noise/pollution study has been presented to justify the proposed allocation. The selection of sites close to the A10 lacks credible justification. The Sustainability Appraisal does not demonstrate how the Council has assessed the danger posed by high vehicle speeds, limited access for large vehicles, or the absence of safe pedestrian or cycle crossings. These are not just planning issues—they directly threaten the safety of families, schoolchildren, and other local residents who use nearby roads and services.

The removal of the skate park on the A10 will have a negative impact on young people in the area. It currently provides a safe, accessible, and positive space for recreation, exercise, and social interaction. Without it, many young people will lose an important community hub that supports their physical health, mental wellbeing, and sense of belonging. The loss of this facility may also lead to more young people gathering in less suitable or unsafe locations, and/or engage in antisocial behaviours which will have a negative impact on the local area and borough as a whole.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not consider that there are any modifications capable of making Enfield's Traveller Local Plan legally compliant or sound. The issues identified—particularly the failure to comply with the duty to co-operate, inadequate evidence base, and the unsafe and unsuitable nature of proposed sites near the A10 are fundamental. These cannot be rectified through minor amendments or wording changes.

Accordingly, I believe the Plan should not proceed in its current form. It is completely the wrong location to have this site.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
  Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Inadequate consultation under Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Many residents in the affected areas were unaware of the consultation process or were given insufficient information about the potential impacts on road safety, environmental conditions, and local services. This lack of transparency undermines the Council's legal obligation to engage all stakeholders meaningfully and fairly.The site selection process lacks transparency and rigour.

There is no clear explanation of why certain sites were preferred or discounted. The Sustainability Appraisal fails to demonstrate that reasonable alternatives were properly considered, particularly in relation to accessibility, environmental constraints, and the integration of Traveller sites with existing communities.

Insufficient evidence regarding site suitability and safety:

The Council has failed to demonstrate that the proposed Traveller sites near or adjacent to the A10 are suitable or safe. The A10 is a heavily trafficked dual carriageway with a long record of serious and fatal accidents, poor pedestrian access, and limited emergency stopping points. Locating residential pitches close to such a hazardous route exposes both residents of the site and existing road users to significant risk. No adequate transport assessment, highway safety audit, or noise/pollution study has been presented to justify the proposed allocation. The selection of sites close to the A10 lacks credible justification. The Sustainability Appraisal does not demonstrate how the Council has assessed the danger posed by high vehicle speeds, limited access for large vehicles, or the absence of safe pedestrian or cycle crossings. These are not just planning issues—they directly threaten the safety of families, schoolchildren, and other local residents who use nearby roads and services.

The removal of the skate park on the A10 will have a negative impact on young people in the area. It currently provides a safe, accessible, and positive space for recreation, exercise, and social interaction. Without it, many young people will lose an important community hub that supports their physical health, mental wellbeing, and sense of belonging. The loss of this facility may also lead to more young people gathering in less suitable or unsafe locations, and/or engage in antisocial behaviours which will have a negative impact on the local area and borough as a whole.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of

modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not consider that there are any modifications capable of making Enfield's Traveller Local Plan legally compliant or sound. The issues identified—particularly the failure to comply with the duty to co-operate, inadequate evidence base, and the unsafe and unsuitable nature of proposed sites near the A10 are fundamental. These cannot be rectified through minor amendments or wording changes.

Accordingly, I believe the Plan should not proceed in its current form. It is completely the wrong location to have this site.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 53 - Miss Leigh Moseley

Respondent: Miss Leigh Moseley

Submission Number:53

Submission Date:02/11/2025 22:02 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site adjoining The Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Subject: Objection to Proposed Traveller Site at The Ridgeway – On Green Belt Land

I wish to register strong objections to development of the Green belt site at The Ridgeway in order to establish a Traveller site.

There appears to be no exceptional circumstances to justify such a decision.
The Council has not provided compelling evidence that this particular piece of protected land should be released.

I am also concerned that the assessment of alternative land has been incomplete. It seems that only a limited number of Council-owned sites were put forward, without any convincing explanation as to why other brownfield sites or land at Meridian Water, cannot be used instead.

I do not agree with the exclusion of other land due to a possible impact on the Enfield Local Plan. This argument lacks consistency, especially given that the provision for the Traveller Plan is an immediate requirement, whereas the Local Plan is still in development and could easily be adapted.

The Ridgeway site forms part of an important stretch of Green Belt that prevents urban sprawl maintaining separation between Enfield and Potters Bar.
The land also lies within an Archaeological Priority Area, further emphasising its sensitivity.

Furthermore, members of the Traveller community indicated a preference for other sites which would offer better access to services and amenities.

In practical terms, the Ridgeway location is wholly unsuitable for the following reasons:

• It is isolated, with no facilities or nearby services.

• It sits alongside a busy 50mph road creating serious safety concerns especially for children.

• Development here would generate additional traffic and noise for nearby homes.

• Site works and service installation would be disruptive and damaging to the local environment.

• The land may be prone to flooding, posing clear risks for mobile homes and caravans.

• The area is subject to existing restrictive covenant prohibiting caravans, reflecting the intention to preserve the rural character of the Green Belt.

This part of Enfield is a cherished open space used by residents, cyclists, and walkers. It provides scenic views at the gateway to the borough. Further development would permanently harm the rural landscape and ecological value.

I urge the Council to protect this section of Green Belt for future generations and to seek a more appropriate and less sensitive location elsewhere in the borough.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		✓

TLP19- 54 - Mrs geraldine cosh

Respondent: Mrs geraldine cosh

Submission Number:54

Submission Date:03/11/2025 07:52 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

The Whole plan

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am deeply concerned for a number of reasons:

The proposed site is already used by the local community.

Health & Safety - it is on a very busy A road and I do not consider this a safe environment for the traveller community

It is protected land (Metropolitan Open Land)

It is extremely close to the Firs Farm Wetlands which the community value. It is a sensitive ecosystem and with these plans signification long term damage could happen to this value ecosystem.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I do not believe this is legal or sound due to the fact it is protected land and the Impact assessment has not be fully completed - if it was it would clear this is not a sound plan

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not feel this is within my expertise this is something the council should complete

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

My reasons are outlined above

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

The Whole plan

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am deeply concerned for a number of reasons:

The proposed site is already used by the local community.

Health & Safety - it is on a very busy A road and I do not consider this a safe environment for the traveller community

It is protected land (Metropolitan Open Land)

It is extremely close to the Firs Farm Wetlands which the community value. It is a sensitive ecosystem and with these plans signification long term damage could happen to this value ecosystem.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I do not believe this is legal or sound due to the fact it is protected land and the Impact assessment has not be fully completed - if it was it would clear this is not a sound plan

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I do not feel this is within my expertise this is something the council should complete

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

My reasons are outlined above

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

TLP19- 55 - Mr Lee Bishop

Respondent: Mr Lee Bishop

On-behalf of: Mr Lee Bishop

Submission Number:55

Submission Date:04/11/2025 13:10 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I'm writing TO OPPOSE the proposed Travellers Site on the A10 skatepark

My objections are based on the suitability of the site for the number of proposed caravans.

In the last year alone there have been 7 reported fires on UK traveller sites.

The most devastating in July at Redbourn in Herts, where 15 of the 18 families homes were destroyed. Aside from the potential loss of life, REDACTED

The proposed A10 site is too small for the number of planned caravans

The site would ideally need to have an emergency (vehicular) exit, and in any case a separate entry & exit would avoid the need for dangerous 3 point turns within the site

Barriers between pitches would need to be brick or concrete, the doubling up of caravans on pitches means there will be more vehicles on site hence less space between them. At that density there is likely to be a "domino effect" the fire engulfing neighbouring cars and caravans.

The Redbourn fire demonstrated that even with the "planned" 6 mtr separation a small fire can spread very rapidly. REDACTED only wooden barriers between pitches were contributory factors.

If such a fire occurred on the A10 it could close this major traffic route for hours. Being a dual carriageway it could be near impossible for emergency vehicles to access the site once traffic starts to back up.

Other considerations include:

The lack of a "play space" within the site.

No provision for vehicles waiting to enter the site which is adjacent to a bus stop (a slip road/layby)

Sound screening to cut traffic noise to the site

Landscaping and provision of "green barrier" external to the site

Adequate provision for waste storage and removal, may need to be DAILY refuse collections to reduce potential fire risk on site

Obviously there is the loss of amenity (The skate park) for ratepayers children, which would presumably have to be reinstated in another part of the borough.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

Yes No

Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. skatepark.docx

TLP19- 56 - Miss Emma Cunnington

Respondent: **Miss Emma CunningtonSport England**

Submission Number:56

Submission Date:04/11/2025 15:41 GMT

Chase Park and Crews Hill

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

PL11: Crews Hill

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Sport England strongly objects to the site allocation at Crews Hill as there is an existing golf course located at this site. The allocation proposes the loss of the golf course and therefore the site allocation is not justified against paragraph 104 of the NPPF. Enfield Council have not developed an assessment which clearly indicates that there is a surplus of golf courses in the area or that mitigation measures are in place to replace the existing golf course. Therefore this site allocation does not comply with national policy.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

N/A

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We would recommend an assessment of need is undertaken and mitigation measures are put in place to replace the Crews Hill golf course in order to meet with paragraph 104 of the NPPF.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 57 - Ann Rarry

Respondent: Ann Rarry

Submission Number:57

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The access to the A10 is dangerous.

This site will not be in keeping with the surrounding area. Toilets are needed in the cemetery, the skateboard park is the only teenage area for youngsters. A cafe would have been nice there too.

[redacted]

Access to the A10 is dangerous, when Sayersbury Way was built, access to the A10 was refused, saying it was dangerous.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

This site will not be in keeping with the surrounding area. Toilets are needed in the cemetery, the skateboard park is the only teenage area for youngsters. A cafe would have been nice there too.

[redacted]

Access to the A10 is dangerous, when Sayersbury Way was built, access to the A10 was refused, saying it was dangerous.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Not suitable in a built up area

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-57.pdf

TLP19- 58 - Lynn Kimsey

Respondent: Lynn Kimsey

Submission Number:58

Submission Date:04/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Ridgeway

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to object to the Gypsy Traveller Site along the Ridgeway Enfield, [redacted] the Ridgeway become extremely busier and busier.

The New housing estate where the old Royal Chase Hotel not finished yet but that in its self creates more traffic.

Then we have the Landfill site which has countless lorries unloading all day, this has also made the road surfaces along near there disgraceful. [redacted]

[redacted] site will create even more traffic, surely common sense must prevail and anyone with any sense should see this.

[redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-58.pdf

TLP19- 60 - Katerina Christofi

Respondent: Katerina Christofi

Submission Number:60

Submission Date:04/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to object to the proposed travellers' site in Bulls Cross Conservation area, a location of significant historic architectural and environmental value, and any such use would, in my view, be wholly inappropriate and contrary to adopted planning policy.

1. Harm to the Bulls Cross Conservation Area and Heritage Assets.

Bulls Cross is one of Enfields Most historically important Conservation Areas, containing listed buildings, traditional farmsteads, and established rural landscapes dating back several centuries. The introduction of a travellers site, with associated hardstanding, vehicles, and temporary structures, would cause substantial harm to the SPECIAL CHARACTER and APPEARANCE of the area defined under Section 72 of the planning (Listed buildings and Conservation Areas) Act 1990. This proposal is inconsistent with Policies DM44 and DMD80 of the Enfield Development Management Document, which requires development within conservation areas to preserve or enhance their character. It would also conflict with Chapter16 of the National Planning Policy Framework (NPPF) which emphasises the need to protect heritage assets and their settings.

1. ENVIRONMENTAL AND GREEN SPACE IMPACT

The Bulls Cross area forms part of Enfields Green belt and provides a valuable buffer of open countryside between Urban Enfield and the Lea Valley. A travellers site in this location would result in:

* Loss of open Green Space and agricultural land.

* Damage to local habitats and biodiversity.

* Visual Intrusion in views across the rural landscape.

These impacts are contrary to NPPF Chapter 13 (protecting Green Belt land) and Policy DMD83 (Development of the Green Belt) which restrict inappropriate development that harms the openness and permanence of the Green Belt.

1. IMPACT ON LOCAL CHARACTER AND AMENITY

Bulls Cross is valued for its peaceful, rural character and distinct sense of historical continuity. The proposed use would introduce visual clutter, noise, and increased vehicle movement-all of which would erode the area's distinctive rural quality and diminish the experience of nearby heritage sites including Myddleton House and Capel Manor Gardens.

1. PRECEDENT AND POLICY CONSISTENCY

Permitting such development in a Conservation Area would set a damaging precedent undermining Enfield Council's long-standing commitment to conserving its historic and natural environment.

It would weaken the credibility of local planning and make future protection of similar heritage areas more difficult. For the reasons stated above, I respectfully urge the council to refuse planning permission or take enforcement action to prevent use of the land as a traveller's site within or adjacent to Bulls Cross Conservation Area. This proposal conflicts with the ENFIELD LOCAL PLAN, the DEVELOPMENT MANAGEMENT DOCUMENT and the NATIONAL PLANNING POLICY FRAMEWORK with respect to Heritage Conservation, visual amenity, and Green Belt Protection.

Thank you for considering my objection. I trust the Council will recognise the need to safeguard the unique historic and environmental character of Bulls Cross.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-60.pdf

TLP19- 61 - Gerard Keane

Respondent: Gerard KeaneD F Keane Builders & Contractors

Submission Number:61

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Executive Summary

1. The proposed A10 site has a shared access tot he A10 with Cemetery House (To the North) which has an established Right of Way area (See extract of the map below.)
2. The Cemetery House Right of Way and associated traffic has not been included in the Council's Capacity Assessment above. The report's omission of the Right of Way is a misleading assessment of the proposed impact.
3. The traffic impact on Cemetery House usage has not been assessed in the above report.
4. Impact on pedestrians crossing the Right of Way area in relation to queuing traffic has not yet been assessed.
5. The shared A10 access would not allow the proposed communal building to be secured as suggested in the report, so the proposal would need to change to avoid potential loss of life if children were to walk towards the A10 or Cemetery House access.
6. The Cemetery House south boundary access is the only usable route in and out of the site for vehicles for the four houses and separate office building.

7. Large delivery trucks currently wait on the Right of Way area until an available person can be contacted to come and open the Cemetery House security gates, this typically takes 10 minute plus. Trucks cannot turn around on the Cemetery House site, they have to reverse back onto the communal car park area, to avoid the need to reverse directly onto the A10.
8. The gap between the Right of Way area and the corner of the existing toilet block is 775mm this is not suitable for pedestrians to use, especially when vehicles are coming and going at Cemetery House. The proposed new route would be substantially more dangerous and not a suitable replacement pathway from the A10 bus stop to Edmonton Cemetery for visitors.
9. The Cemetery House owner's ask for the above factors to be assessed in a revised Council Capacity Assessment, amended to include the impact of the missing Right of Way. The revised report would then be assessed by the Cemetery House Planning Consultant and separate Traffic Consultant who will feedback to the Council.

The Cemetery House site was purchased from Enfield Council who advised the Victorian north entrance was pre-car and not suitable for vehicle access, due to the width and proximity to the A10 corner. Enfield Council commissioned a traffic consultant to assess a new proposed south entrance as part of the sale. The extract of the plan below shows a refuse lorry access for the site, this informed the shape of the eventual Right of Way area that was then given as a legal right ti the Cemetery House land to make it viable as a site with vehicle access.

Planning permission was later given on the basis that the Right of Way road would provide access from the site to the A10 via the communal car parking area an shared gate, to alleviate traffic issues for the A10.

The new owners took the advice of Enfield Council in terms of the shared access to the A10. In the planning application advice the Council did not, no vehicle access from the north due to proximity and size of the pre-car gates to the A10 junction with car coming around the corner at speed on the east side of the gates and a bus stop on the west side of the existing.

Recently in 2025, the Traveller Local Plan Assessment has not included the Right of Way and the proposals are misleading and have led to the endorsement of a proposal that is based upon inaccurate information.

The above indicates the current vehicle access plans for Cemetery House.

The vehicle gates need to remain locked for security reasons and the safety of residents and guests. Gates operated via an intercom to the office or house, no full-time site staff to manage access and opening of gates.

Below is a list of vehicle situations that need to be considered and planned for, to address risks to the public in a newly revised assessment for the current skatepark and car park areas.

SCENARIO 1 - 11.5m long refuse truck (Both private and commercial for the office and Council residential service) or a 12m 3-axle delivery truck, or a fire Appliance arrives at the Cemetery House south vehicle security gate is locked. *Driver response - Truck calls intercom and waits for 3-10 minutes for a site operative to check and come or remotely open the gates. When finished, truck reverses back onto the car park and then drives onto the A10.*

SCENARIO 2 - Truck arrives to find another truck or visitor care is waiting on the Right of Way drive to be let into the Cemetery House. *Driver response - Second truck waits in the car park to the south until the first truck reverses and then departs onto the A10.*

SCENARIO 3 - Truck (For either site) arrives to find the A10 access is being blocked by people using the area or due to vehicles parking or reversing or general maneuvering from either Cemetery House or the proposed Traveller site. *Driver response - Wait on the A10, next to the bus stop, pull onto the pavement until access clears. Alternatively drive past to the next junction, experienced drivers will be reluctant to drive past access, as this will result in a 15 minute additional journey requiring them to find turning to the north and head back via the A406 roundabout (To the south) before they can return up the A10 northbound carriageway, although there is no guarantee when they come back they will be able to drive into Cemetery House.*

Cemetery House can accommodate smaller commercial vans and trucks that can turn within the site, but if a larger delivery truck were to arrive at the south gates and be denied access (Due to size) it would need to reverse onto the communal parking space to be able to depart onto the A10, it appears this scenario had not previously been considered by the Council, but this is the current reality of the site access requirements and need to be considered.

We request the Council carries out a revised traffic assessment to determine the impact on traffic and safety in relation to the above three vehicle scenarios. Once complete, the Cemetery House owners would seek advice from their own Planning Consultant (Royal Town Planning Institute member) and Traffic Consultant (Chartered Institution of Highways and Transportation member) to assess the impact of the proposals.

Cemetery House vehicle usage

Occupants and visitors to the four terraced houses and four storey main office building have the following capacity:

- Total of 11 car parking spaces
- 16 cycle parking
- Site serviced by:
  - Commercial office waste trucks and Council waste trucks.
  - Parcel and food deliveries
  - Business and domestic supplier vehicles
  - Maintenance and gardening vehicles.

Pedestrian access to the site via north and south boundaries, with dedicated security gates for people and pavements leading up to them.

A10 Traveller site impact assessment

The proposals in the Enfield Council's Capacity Assessment, Traveller Local Plan Evidence base Revision C - Dated 13.08.25 in its current form would create a potential danger to life, increase in pollution, potential access disputes, loss of amenity, loss of property value and additional demands on local services.

An extract of the proposal plans from the recent assessment has been included below for ease of reference.

- The above does not consider the Cemetery House Right of Way and associated traffic has not been included in the Council's Capacity Assessment. The reports omission of the Right of Way is a misleading assessment of the propose impact.
- The traffic impact on Cemetery House usage has not been assessed in the above report.
- Impact on pedestrians crossing the Right of Way area in relation to queuing traffic has not yet been assessed.

- The shared A10 access would not allow the proposed communal building to be secured as suggested in the report (see red dotted line) as this would prevent the use of the legal Right of Way benefiting Cemetery House.
- If the secure line was broken to allow the established Right of Way then the proposal could lead to the potential loss of life if children were to walk towards the A10 or Cemetery House access.
- The new secure vehicle gate indicated in blue would not be secure as the residents and occupants of Cemetery House would require access and use of the gate, as would associated services and delivery vehicles to support the business on the site.

The below plan indicates the current vehicle access plans for Cemetery House. The proposal to use the hatched Right of Way area for pedestrians to take a new pathway to the cemetery will lead to the public coming into close proximity with large service vehicles.

The below plan shows the position of trucks idling or parked while they wait for the security gates to be opened. The would create a natural hazard for visitors to have to navigate around.

The Right of Way comes within 775mm of the existing toilet block, trying to get through this gap to access the cemetery is very difficult and dangerous in terms of traffic blind spots where the public would be forced to pass. The route is not easily accessible for all visitors.

The communal building will be open to traffic with the Right of Way factored in.

Further pollution not quantified to date, new risks and other social issue like additional noise, could lead to shared access disruption to businesses and residents to the north and the proposed residents of the scheme under consideration.

An extract of the proposal plans from the recent assessment has been shown below below for ease of reference.

- The green boundary to the north and east would be broken by the Right of Way usage for pedestrians and vehicles.
- The green dotted route would be nearly blocked off and not accessible whilst vehicles were using the existing Right of Way for periods of the day.
- The red dotted line would block the existing Right of Way.
- The communal building access would be in close proximity to Cemetery House traffic, this has not been assessed by the report.
- The vehicle blue gate would not be secure and exclusive to the Traveller site.
- The grey road area would be shared around the A10 access zone, this would prove difficult to manage.

In Conclusion

We ask the Council to review the above and provide an assessment of the traffic and layout scenarios described in this report, making proposals available to the public. The Cemetery House owners would have their own Planning Consultant (Royal Town Planning Institute member) and Traffic Consultant (Chartered Institution of Highways and Transportation member) to review the viability of the revised proposals and identify factors that might not have been addressed to date. We would then as Enfield Council to respond to this review and suggest recommendations on changing the scheme proposals.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-61 TLP-Rev-C Assessment.pdf
2. TLP19-61.pdf

TLP19- 63 - Ben Bowles

Respondent: Ben BowlesHertfordshire County Council

Submission Number:63

Submission Date:04/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

HCC have no comments to make on the submission documents.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

HCC have no comments to make on the submission documents.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

HCC have no comments to make on the submission documents.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-63.pdf

TLP19- 64 - John Salmon

Respondent: John Salmon

Submission Number:64

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

4 Legal compliance: No
The Plan does not appear to meet the requirements for meaningful community engagement under the Town and Country Planning (Local Planning) (England) Regulations 2012. In particular, there is no clear evidence that Enfield Council consulted or involved affected local youth organisations or community users of the existing Skatepark facility. This omission undermines the transparency and inclusivity of the plan-making process and raises concerns about legal compliance with the Council's Statement of Community Involvement.

4 Duty to co-operate: No
The Plan does not clearly demonstrate effective co-operation with neighbouring authorities or relevant bodies (for example, other North London boroughs or the GLA) in identifying appropriate alternative sites for Traveller accommodation. As a result, potentially more suitable locations beyond Enfield's community recreation land may not have been properly explored, contrary to Section 33A of the Planning and Compulsory Purchase Act 2004 (the duty to cooperate).

I object to the proposed allocation of the A10 site (adjacent to the Edmonton Skatepark and Cemetery) as a Traveller transit site. This part of the Plan is not justified because the Council has not provided proportionate evidence or assessed reasonable alternatives. The site is already in use as a valued community Skatepark and youth recreation area. The social and health benefits of this existing use have not been properly weighed against the proposed allocation.

It is not effective because the site is unlikely to be deliverable. It lacks safe access, essential infrastructure and services, and would require the loss of an established leisure facility, which is likely to face sustained public opposition and practical delivery barriers.

It is not consistent with national policy because the proposal conflicts with:
• NPPF (para 99) – which protects existing open space and recreational land unless equivalent or better provision is made;
• NPPF (para 130 and 185) – which require developments to create safe, healthy, and inclusive environments; and
• London Plan Policy S5 – which safeguards community, leisure and play facilities. The A10 site's proximity to a busy dual carriageway also raises air-quality and safety concerns (Eg. access for Emergency service vehicles coming from Edmonton Green via Church Street) contrary to these policies.

For these reasons the A10 allocation fails the "justified", "effective", and "consistent with national policy" tests of soundness in paragraph 35 of the NPPF.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Remove the A10 Skatepark site from the list of allocations.

If further Traveller capacity is required, identify and assess alternative locations that do not result in the loss of existing community or youth recreation facilities, in consultation with affected user groups.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination		
Schedule of Main modifications stage (following hearings)		
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-64.pdf

TLP19- 65 - Emilli Khandker

Respondent: Emilli Khandker

Submission Number:65

Submission Date:04/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1), Land adjacent to Ridgeway (Site 2), Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe that the proposed places for permanent settlement at site 1 and site 2 are appropriate and accurate for both settled members of Enfield and those in the travelling community. However, I take great issue with the proposed location of the transit site at the A10 Skate Park (site 3) location as it is not effective regarding the goals of the plan. The proposal for site 3 is unsound.

The aims of the TLP in section 1.5 are stated to aim to provide the traveller community with sites that are located in areas that have adequate access to public transport and community facilities (including schools, health centres and shops) but this location is far from any shops and amenities or even health centres. Furthermore, the aim states to provide access to high quality sites, which this is not due to its proximity to one of the busiest junctions in the borough. [redacted]

[redacted]For generations, this skate park has been in use and has already been eroded by the removal of tennis courts, which were then relocated and now have to be paid to use.

As a young person myself, I used the skate park growing up and know that it is consistently used by members of the community of all ages currently. Spaces for young people to gather are constantly being eroded, leading to more gang violence and harm. Whilst other skate parks exist, such as in bush hill park, these are areas that are not safe for young people, especially young girls. Socially within the community, it is known amongst young people that there are places not to visit due to violent activity and it being generally unsafe, the A10 skate park is one of the only places that young girls especially feel safe to use and are allowed by their parents to go to. This is because the space is open, near the cemetery, and is near a frequently used road. It is also easily accessible by bus. By replacing the skate park, you are actively removing one of the only remaining social spaces for young people living in Enfield, putting them in harm, and forcing them indoors. These hobbies are some of the only outlets that the youth have.

At the consultation in the council building which I attended, it was stated that there are plans to relocate the skate park, however, this begs the question of why that land can’t be used for the transit site. The A10 skate park is an established safe area, and if it is moved to an area that is deemed not safe for young people to visit, there would be no point in relocating it. This is not just a skate park, it is an important pillar of community, and one of the only places accepted as a safe place for young girls. By moving it, you will be disrupting the lives of the local young people significantly.

Across the road from the skate park is the Church Street Recreational ground, where travellers have been known to settle. This seems like a far more appropriate area to build a transit site. The area is more secluded and away from the main road, providing more safety for the travelling community. The vast size of the recreation ground means that a transit site here would not take away from the current sports that the recreation ground hosts, creating benefit for both the settled and travelling community. Also, considering that the area is already used by the travelling community, it seems to be a safe and familiar place. Whilst this may be a green space, I do not see an issue with the site being built here considering the small size of the transit site.

Another issue with the proposed site is its functionality. It is situated on one of the busiest parts of the A10, with the entrance being right next to a bus stop. This road is also often sped down illegally. Caravans are not small vehicles, and the consistent entry and exit at this point, as it is a transit space and not permeant, poses a great road safety risk, and is likely to encourage traffic.

It seems to have accessibility issues that would be unsafe for the community using it. Furthermore, by removing the footpath going through the skate park, you are essentially creating an alleyway that creates a risk of crime and poses a safety risk for individuals using the site, as well as pedestrians.

[redacted]It is very out in the open and next to a main road. [redacted]Contrastingly, if situated in a more secluded private area, there would be a larger sense of safety. I worry that by removing an essential community area to accommodate to a temporarily visiting community, the council will create more tension, segregation, and discrimination. Being situated next to a busy dual carriage way, the area is also going to have a lot of pollution and is generally not a nice place for people to reside.

There are also logistical issues.

[redacted]

[redacted]

I whole heartedly believe in the right of travellers to have a safe place to stay whilst they visit relatives or attend events, but this location (site 3 A10 skate park) would not provide this. Likewise, such measures should not at the cost of the settled community, and one of the few safe spaces that have not been eroded. Considering that the measure is aimed at providing safer spaces for members of travelling communities, it seems that this site (site 3) does not provide adequate safety and doesn't promote integration.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan for the transit site on the A10 Skate Park (site 3) needs to be changed to a different location. The site must be moved to an area that doesn't currently have an extensively used community area on it, that doesn't hold any local significance. The site also needs to be moved to an area that will actually provide safety for the travelling community,[redacted]

To be sound and compliant, the area needs to provide actual safety and access to amenities, the location simply needs to be changed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	

Start of the examination	
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-65.pdf

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1), Land adjacent to Ridgeway (Site 2), Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe that the proposed places for permanent settlement at site 1 and site 2 are appropriate and accurate for both settled members of Enfield and those in the travelling community. However, I take great issue with the proposed location of the transit site at the A10 Skate Park (site 3) location as it is not effective regarding the goals of the plan. The proposal for site 3 is unsound.

The aims of the TLP in section 1.5 are stated to aim to provide the traveller community with sites that are located in areas that have adequate access to public transport and community facilities (including schools, health centres and shops) but this location is far from any shops and amenities or even health centres. Furthermore, the aim states to provide access to high quality sites, which this is not due to its proximity to one of the busiest junctions in the borough. [redacted]

[redacted]. For generations, this skate park has been in use and has already been eroded by the removal of tennis courts, which were then relocated and now have to be paid to use.

As a young person myself, I used the skate park growing up and know that it is consistently used by members of the community of all ages currently. Spaces for young people to gather are constantly being eroded, leading to more gang violence and harm. Whilst other skate parks exist, such as in bush hill park, these are areas that are not safe for young people, especially young girls. Socially within the community, it is known amongst young people that there are places not to visit due to violent activity and it being generally unsafe, the A10 skate park is one of the only places that young girls especially feel safe to use and are allowed by their parents to go to. This is because the space is open, near the cemetery, and is near a frequently used road. It is also easily accessible by bus. By replacing the skate park, you are actively removing one of the only remaining social spaces for young people living in Enfield, putting them in harm, and forcing them indoors. These hobbies are some of the only outlets that the youth have.

At the consultation in the council building which I attended, it was stated that there are plans to relocate the skate park, however, this begs the question of why that land can’t be used for the transit site. The A10 skate park is an established safe area, and if it is moved to an area that is deemed not safe for young people to visit, there would be no point in relocating it. This is not just a skate park, it is an important pillar of community, and one of the only places accepted as a safe place for young girls. By moving it, you will be disrupting the lives of the local young people significantly.

Across the road from the skate park is the Church Street Recreational ground, where travellers have been known to settle. This seems like a far more appropriate area to build a transit site. The area is more secluded and away from the main road, providing more safety for the travelling community. The vast size of the recreation ground means that a transit site here would not take away from the current sports that the recreation ground hosts, creating benefit for both the settled and travelling community. Also, considering that the area is already used by the travelling community, it seems to be a safe and familiar place. Whilst this may be a green space, I do not see an issue with the site being built here considering the small size of the transit site.

Another issue with the proposed site is its functionality. It is situated on one of the busiest parts of the A10, with the entrance being right next to a bus stop. This road is also often sped down illegally. Caravans are not small vehicles, and the consistent entry and exit at this point, as it is a transit space and not permeant, poses a great road safety risk, and is likely to encourage traffic.

It seems to have accessibility issues that would be unsafe for the community using it. Furthermore, by removing the footpath going through the skate park, you are essentially creating an alleyway that creates a risk of crime and poses a safety risk for individuals using the site, as well as pedestrians.

[redacted]. It is very out in the open and next to a main road. [redacted] Contrastingly, if situated in a more secluded private area, there would be a larger sense of safety. I worry that by removing an essential community area to accommodate to a temporarily visiting community, the council will create more tension, segregation, and discrimination. Being situated next to a busy dual carriage way, the area is also going to have a lot of pollution and is generally not a nice place for people to reside.

There are also logistical issues.

[redacted]

[redacted]

I whole heartedly believe in the right of travellers to have a safe place to stay whilst they visit relatives or attend events, but this location (site 3 A10 skate park) would not provide this. Likewise, such measures should not at the cost of the settled community, and one of the few safe spaces that have not been eroded. Considering that the measure is aimed at providing safer spaces for members of travelling communities, it seems that this site (site 3) does not provide adequate safety and doesn't promote integration.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan for the transit site on the A10 Skate Park (site 3) needs to be changed to a different location. The site must be moved to an area that doesn't currently have an extensively used community area on it, that doesn't hold any local significance. The site also needs to be moved to an area that will actually provide safety for the travelling community, [redacted]

To be sound and compliant, the area needs to provide actual safety and access to amenities, the location simply needs to be changed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	

Start of the examination	
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1), Land adjacent to Ridgeway (Site 2), Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

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The aims of the TLP in section 1.5 are stated to aim to provide the traveller community with sites that are located in areas that have adequate access to public transport and community facilities (including schools, health centres and shops) but this location is far from any shops and amenities or even health centres. Furthermore, the aim states to provide access to high quality sites, which this is not due to its proximity to one of the busiest junctions in the borough. [redacted]

[redacted] For generations, this skate park has been in use and has already been eroded by the removal of tennis courts, which were then relocated and now have to be paid to use.

As a young person myself, I used the skate park growing up and know that it is consistently used by members of the community of all ages currently. Spaces for young people to gather are constantly being eroded, leading to more gang violence and harm. Whilst other skate parks exist, such as in bush hill park, these are areas that are not safe for young people, especially young girls. Socially within the community, it is known amongst young people that there are places not to visit due to violent activity and it being generally unsafe, the A10 skate park is one of the only places that young girls especially feel safe to use and are allowed by their parents to go to. This is because the space is open, near the cemetery, and is near a frequently used road. It is also easily accessible by bus. By replacing the skate park, you are actively removing one of the only remaining social spaces for young people living in Enfield, putting them in harm, and forcing them indoors. These hobbies are some of the only outlets that the youth have.

At the consultation in the council building which I attended, it was stated that there are plans to relocate the skate park, however, this begs the question of why that land can't be used for the transit site. The A10 skate park is an established safe area, and if it is moved to an area that is deemed not safe for young people to visit, there would be no point in relocating it. This is not just a skate park, it is an important pillar of community, and one of the only places accepted as a safe place for young girls. By moving it, you will be disrupting the lives of the local young people significantly.

Across the road from the skate park is the Church Street Recreational ground, where travellers have been known to settle. This seems like a far more appropriate area to build a transit site. The area is more secluded and away from the main road, providing more safety for the travelling community. The vast size of the recreation ground means that a transit site here would not take away from the current sports that the recreation ground hosts, creating benefit for both the settled and travelling community. Also, considering that the area is already used by the travelling community, it seems to be a safe and familiar place. Whilst this may be a green space, I do not see an issue with the site being built here considering the small size of the transit site.

Another issue with the proposed site is its functionality. It is situated on one of the busiest parts of the A10, with the entrance being right next to a bus stop. This road is also often sped down illegally. Caravans are not small vehicles, and the consistent entry and exit at this point, as it is a transit space and not permeant, poses a great road safety risk, and is likely to encourage traffic. It seems to have accessibility issues that would be unsafe for the community using it. Furthermore, by removing the footpath going through the skate park, you are essentially creating an alleyway that creates a risk of crime and poses a safety risk for individuals using the site, as well as pedestrians.

[redacted]It is very out in the open and next to a main road. [redacted]Contrastingly, if situated in a more secluded private area, there would be a larger sense of safety. I worry that by removing an essential community area to accommodate to a temporarily visiting community, the council will create more tension, segregation, and discrimination. Being situated next to a busy dual carriage way, the area is also going to have a lot of pollution and is generally not a nice place for people to reside.

There are also logistical issues.[redacted]

[redacted].

Overall, the A10 skate park seems to be an entirely inappropriate place to put a transit park. It removes an integral community space, seems unsafe and inappropriate for the travellers using it, and poses the risk of creating tension with those using the cemetery.

I whole heartedly believe in the right of travellers to have a safe place to stay whilst they visit relatives or attend events, but this location (site 3 A10 skate park) would not provide this. Likewise, such measures should not at the cost of the settled community, and one of the few safe spaces that have not been eroded. Considering that the measure is aimed at providing safer spaces for members of travelling communities, it seems that this site (site 3) does not provide adequate safety and doesn't promote integration.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The plan for the transit site on the A10 Skate Park (site 3) needs to be changed to a different location. The site must be moved to an area that doesn't currently have an extensively used community area on it, that doesn't hold any local significance. The site also needs to be moved to an area that will actually provide safety for the travelling community, [redacted]

To be sound and compliant, the area needs to provide actual safety and access to amenities, the location simply needs to be changed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination		
Schedule of Main modifications stage (following hearings)	✓	

Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-65 (2).pdf
2. TLP19-65.pdf

TLP19- 66 - Michael O'Connor

Respondent: **Michael O'Connor**

Submission Number:66

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This is an unsuitable location for several reasons

- [redacted]
- How many skateboard parks are there in Enfield for young people?
- [redacted]
- Area is far too small
- New development behind the toilets and Cemetery House, [redacted]
- [redacted]
- A10 too busy and danger to traveller children?
- Sure there are other areas that can be utilised for travellers?
- Will side gate remain open - [redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-66.pdf

TLP19- 67 - Eleni Georgiou

Respondent: Eleni Georgiou

Submission Number:67

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I believe that changing the Skatepark into a Traveller transit site, will cause a lot of problems on the roads, plus the fact that it's where the bus stop is another problem, plus next to a Cemetery. I personally believe the flowers that people leave on their families graves won't be there for long, unless you can put CCTV everywhere, which of course you won't. I'm not being raciests. Let me give you an example, a few years back there were Travellers caravans parked in Sainsbury's car park on the Great Cambridge Road, I walked in to do some shopping and saw a young child running out with sweets in her hands and her mother behind her also running and looking over her shoulder, my ins told me that it was not paid for, so I took it from her and said, did Mummy pay for it, the Mother picked her up and run out, as usual security did nothing. Did my shop and went to leave. When two young men came up to me and asked aggressively why I did what I did, looked at them both and asked if they were Catholics, they said yes, so I said that one of the Ten Commandments is "Thou shall not Steal'. They said nothing and just walked away. When I got to work I phoned Sainsburys Head Office and told them would be losing a lot of customers if they did not remove the Travellers, within a week they were removed. I know a lot of people will not be happy.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-67.pdf

TLP19- 68 - Vicki Pite

Respondent: Vicki PiteEnCaf Land Use Working Group

Submission Number:68

Submission Date:04/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Introduction

1. EnCaf Land Use Working Group (ELUWG) welcomes the opportunity to comment on the Regulation 19 Draft Traveller Local Plan (TLP). We participated fully at the Regulation 18 stage and submitted a detailed representation and Call for Sites ("Appendix A – Call for Sites V5 FINAL 04112024") on 4 November 2024. That submission identified twelve alternative locations that we believed could potentially better meet Enfield's Gypsy and Traveller accommodation needs in sustainable, accessible, and inclusive ways.

2. Our submission was acknowledged by the Council on 4 November 2024, confirming it was validly received. However, our review of the Regulation 19 documentation indicates that our Regulation 18 representation and proposed sites have not been included, acknowledged, or assessed in the evidence base.

3.Both our Regulation 18 representation and proposed sites have been re-provided and re submitted with this representation, as the comments remain valid.

2. Summary of our main concerns

A. Failure to take into account our Regulation 18 representation

4. It appears our Regulation 18 representation and accompanying Call for Sites information have been entirely omitted from both the Regulation 18 Consultation Statement (September 2025) and the Site Selection Topic Paper (September 2025).

5. The Site Selection Topic Paper incorrectly states that "no new sites were submitted during the 2024 Call for Sites," (points 3.5 & 3.6, p.8) which is factually wrong. Our detailed submission, which was duly acknowledged, directly contradicts that statement. Nor do the sites we submitted appear in Appendix 03: List of excluded sites following Site Selection Assessment (page 61).

6. In our view, this omission means the Traveller Local Plan (TLP) cannot demonstrate compliance with Regulation 19(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires the Council to show how representations have been taken into account in preparing the submission plan.

B. Consequences for Soundness

7. Because our submission and proposed sites were excluded from the evidence base, the TLP fails several tests of soundness under the National Planning Policy Framework (NPPF, 2024):

a. Not "Positively Prepared" (NPPF 35a) – the Council has not considered all reasonable options to meet Traveller needs within Enfield.

b. Not "Justified" (NPPF 35b) – the evidence base is incomplete and not based on proportionate evidence.

c. Not "Effective" (NPPF 35c) – long-term delivery depends on future masterplans at Crews Hill and Chase Park, whose deliverability remains uncertain.

d. Procedural fairness – our duly made representation has not been reported or acknowledged, contrary to NPPF 31 and the Council's own Statement of Community Involvement (2023). While this omission may not amount to a direct breach of the statutory Duty to Co-operate, it does we believe, undermine the Council's overall evidence of constructive and transparent engagement, which is central to demonstrating DtC compliance.

C. Legal and procedural compliance

8. Under Regulation 18(3) and Regulation 19(1)(b), all representations received must be considered and reflected in the Council's plan-making record. Omitting a valid submission and Call for Sites not only breaches the Regulations but also undermines transparency and confidence in the consultation process.

3. General Conformity with the London Plan

9. It appears to us that the TLP has not demonstrated the required general conformity with the London Plan 2021 (LP21). Under the Planning and Compulsory Purchase Act 2004 (s.24), all Development Plan Documents prepared by London boroughs must be in general conformity with the Mayor's spatial development strategy. In practice, this means local plans must not conflict with the strategic intent of the London Plan and must help deliver its overall objectives of sustainable growth, social inclusion, and environmental protection.

10. We think that in preparing the TLP, the Council should have had clear regard to key LP21 policies, particularly H14 (Gypsy and Traveller accommodation), G2 (Green Belt), G3 (Metropolitan Open Land), and the broader strategic policies on connectivity, inclusivity, and spatial sustainability (e.g., SD6, D3, H1, and T1–T4). These are the benchmarks for "general conformity."

11. From our review, the Regulation 19 TLP conflicts with several of these strategic policies:

a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects sites to be accessible, sustainable, and well connected to health, education, and employment. The TLP allocates Bulls Cross, The Ridgeway, and A10 (Transit site), all edge-of-borough, low-PTAL Green Belt or MOL locations, remote from shops and services. This approach appears to run directly against the intent of H14 to promote inclusion and integration.

b. Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP21 allows boundary changes only in very exceptional circumstances and only where no suitable brownfield or urban sites exist. Despite our submission of twelve alternatives (many on Council-owned and/or brownfield land), the Council proposes to release two Green Belt sites and one MOL site for Traveller accommodation. Because our alternatives were never assessed, the Plan cannot in our view demonstrate that the G2/G3 tests have been met.

c. Strategic integration and inclusivity (Policies SD6 and H14A): LP21 promotes mixed, inclusive communities and integration across London's urban fabric. By locating all new Traveller provision in remote, rural, and environmentally constrained areas, the TLP risks reinforcing segregation rather than fostering inclusion.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

4. Specific Site issues

Bulls Cross Nursery (CFS 284)

12. As a further example of the inconsistencies outlined above, we draw particular attention to the proposed allocation of Bulls Cross Nursery (CFS 284), which highlights serious issues with the Council's approach to site assessment, optimisation, and general conformity with LP21.

13. It appears that there is an inconsistency in the way the Bulls Cross Nursery site has been treated across the Council's evidence base. The Housing and Economic Land Availability Assessment (HELAA, 2023) for the main draft ELP identifies the site (CFS284) as potentially developable, recording an area of approximately 0.69 hectares and assessing it as capable of

accommodating around 79 homes under the main Local Plan methodology. In contrast, the TLP describes the same site as being around 0.45 hectares and proposes it for only eight Traveller pitches.

14. This discrepancy in both site area and capacity is significant. If the land was judged suitable for 79 conventional dwellings in the HELAA, it is difficult to understand why it is now deemed suitable for only eight pitches.

15. The Council's own Site Selection Topic Paper (3.20) states that sites rejected for housing are "very unlikely to be suitable for Traveller accommodation," yet here a site previously rejected for housing is included, but at what appears to be a significantly reduced capacity.

16. We therefore question whether this allocation represents the optimum use of land, as required by LP21 Policy D3, and whether the site assessment has been applied consistently or transparently. In our view, this inconsistency undermines the robustness of the evidence base and raises concerns about whether the plan is justified, effective, and in general conformity with LP21.

17. On this basis, we think the proposed allocation fails the tests of soundness set out in paragraph 35 of the NPPF, in particular the requirements that the Plan be justified (an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence) and effective (deliverable and consistent with national policy). We therefore request that the Council provide clarification of the site boundary, the rationale for the reduced developable area, and the justification for such a low-intensity use relative to the HELAA findings, before the allocation proceeds.

18. Moreover, this inconsistency calls into question the credibility of the Council's wider approach to optimising urban capacity before releasing Green Belt land. If sites within the existing Green Belt are being used at sub-optimal densities, contrary to LP21 Policy D3 and the Council's own evidence base, then the claimed "exceptional circumstances" for Green Belt release cannot be said to rest on a sound or proportionate foundation.

19. This inconsistency also has implications for the Plan's general conformity with LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation). Both policies require boroughs to plan proactively for Traveller needs using a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities. The selection of Bulls Cross Nursery, previously ruled out for housing due to accessibility and isolation concerns, appears contrary to these requirements. The resulting allocation does not demonstrate that the site is well-located for services or that it has been assessed consistently with the broader housing strategy. In our view, this further undermines the Plan's compliance with LP21 Policy H14 and Policy D3, and reinforces our concern that the TLP is not in general conformity with LP21 and does not satisfy the soundness tests of justification and effectiveness under paragraph 35 of the NPPF.

20. Taken together, these issues reinforce our wider concern that the TLP has not been prepared as an integrated or procedurally consistent part of the Enfield Local Plan, and that decisions about site suitability and capacity have not been applied fairly, transparently, or in accordance with the Council's stated methodology.

21. We therefore recommend that the Council reappraise the Bulls Cross Nursery allocation before submission of the TLP. This should include a review of the site boundary, developable area, and accessibility constraints, using the same parameters and density assumptions applied in the

HELAA and the main Enfield Local Plan. If the Council continues to propose this site, it should clearly justify why the site is now considered suitable for Traveller use when previously rejected for housing and explain how the significantly reduced capacity accords with LP21 Policy D3 (Optimising Site Capacity) and Policy H14 (Gypsy and Traveller Accommodation).

22. In our view, this reappraisal should form part of a wider reconciliation exercise between the two plans to ensure that both the draft Local Plan and TLP apply a single, transparent methodology for site selection and capacity testing. Without this, the evidence base will remain inconsistent and the Plan risks failing the tests of soundness and procedural fairness under paragraph 35 of the NPPF.

Land at A10 / Edmonton Skate Park (Site 3)

23. The Council's proposed allocation of the A10 site for a transit facility accommodating up to 15 caravans relies upon extending the site into the adjoining public skate park to achieve safe access and turning area. Paragraph 5.20 of the Site Selection Topic Paper (September 2025) confirms that the existing site is too small and unsafe, and that "land to the west (currently occupied by a skate park) could be incorporated to extend the site." It further notes that "to avoid any net loss of open space, the skate park would need to be relocated "but that this is "being considered outside of the TLP process."

24. We think this approach is unsound and inconsistent with national and LP21 policy for several reasons:

a. Absence of up-to-date evidence: There is no current Playing Pitch Strategy (PPS) for Enfield. This same evidential gap has already hindered the main Local Plan examination. Without such evidence the Council cannot demonstrate that the skate park, or the open space it occupies, is surplus to requirements as required by NPPF 99 and London Plan Policy S5 (Sports and Recreation Facilities). The Regulation 19 TLP therefore lacks the necessary proportionate evidence base required by NPPF 31.
b. Unassessed loss of valued open space: By proposing the relocation "outside of the TLP process", the Council has excluded the environmental, social and cost implications of the skate park's removal from the sustainability appraisal and Integrated Impact Assessment. This undermines the Plan's justification and transparency, contrary to NPPF 35(b).
c. Failure to test reasonable alternatives: The absence of a current PPS means the Council cannot know whether other under-used recreation grounds (for example Churchfield Recreation Ground or similar sites) could accommodate the transit facility with less harm. The Plan therefore fails the "justified" test of soundness, as it cannot be shown that Site 3 is the most appropriate or least harmful option.
d. Conflict with earlier consultation evidence: At Regulation 18, numerous consultees, including ELUWG, highlighted that the skate park is well-used by young people, recently refurbished, and located adjacent to sensitive amenity areas. Those concerns have not been addressed; rather, the site has been expanded to include the amenity in question. This is procedurally and substantively flawed.

25. In short, the Council has not demonstrated that the loss of public open space or amenity is justified or deliverable, nor that the skate park relocation is secured or even feasible. The proposal therefore conflicts with NPPF 99–101, LP21 Policy S5, and Policy G3 (Open Space).

26. To render the Plan sound, ELUWG considers that one of the following modifications are needed:

a. Deletion or deferral of the Site 3 allocation pending completion of the Council's updated PPS to allow evidence-based evaluation of open-space capacity and alternative sites; or,

b. A modification to Policy TLP1 and the Site 3 Pro-forma requiring that: “No development shall take place until an up-to-date Borough-wide Playing Pitch Strategy and Open Space Assessment demonstrate that the existing skate park is surplus to requirements, and a replacement facility of equivalent or better quality and accessibility has been identified and secured and that no suitable alternative is available.”

27. In our view, until this evidence is available, the allocation of Site 3 is not positively prepared, justified, effective, or consistent with national policy, and therefore fails the tests of soundness under NPPF 35.

Meridian Water (PL5)

28. Page 12 of the Traveller Local Plan Site Selection Topic Paper (September 2025) sets out why Meridian Water (PL5) was not considered a reasonable alternative for Traveller accommodation. It asserts that the Meridian Water masterplan is “highly structured”, that “most land parcels are already committed through detailed planning permissions (e.g. Meridian One)” and that the Council’s “delivery responsibilities and funding agreements with the GLA and central government” leave “no realistic residual land suitable for Traveller site provision without fundamentally compromising the project.”

29. We find this reasoning at odds with the evidence contained in the Enfield Local Plan (ELP). Meridian Water is indeed a major regeneration area, but the ELP does not commit to or plan for the delivery of over 10,000 homes within the plan period to 2041. The ELP proposes approximately 6,700 dwellings to 2041, and fewer than 9,000 in total even if development continues beyond that period. The over “10,000 homes” figure cited in the Topic Paper therefore represents an aspirational long-term capacity, not a deliverable or funded commitment.

30. The TLP’s assumption that Meridian Water is “fully committed” to 10,000 homes and incapable of accommodating a Traveller site is therefore factually inaccurate. Moreover, the Council is both majority landowner, owning around 70% of the developable land, and master-developer for the scheme. This gives the Council significant control over the form and phasing of development, and therefore the ability, should it choose, to integrate a small number of permanent or transit Traveller pitches within this strategic site.

31. Notwithstanding this, the council’s recent submissions to the hearings of the main local plan identifies significant previously unconsidered challenges with the masterplanning of the southern section of Meridian east – notably the council has recognized that underground water infrastructure places considerably constraints on the type and scale of development possible. Given this, a re-assessment of the scope for delivering permanent, transit or meanwhile pitches at Meridian Water is needed.

32. The Topic Paper’s conclusion is also inconsistent with the policy framework of LP21 Policy H14 which requires boroughs to plan positively for Gypsy and Traveller accommodation and to integrate provision within their overall housing and placemaking strategies. Given that Meridian Water is a publicly led regeneration project of strategic importance, it would be both logical and equitable for a small part of this site to contribute towards meeting Enfield’s identified need, rather than excluding it entirely.

33. In this context, it appears unreasonable that other potential placemaking areas such as Crews Hill and Chase Park are described as “reasonable alternatives” for Traveller provision, while Meridian Water, a site with superior accessibility, services, and under Council control, is dismissed on

grounds which are neither supported by the ELP evidence base nor consistent with the Mayor's spatial strategy for inclusive growth. To be clear, the three adopted or approved masterplans for Meridian Water are all based on the delivery of 5,000 homes, none propose "over 10,000 new homes", as cited on page 12 of the Site Selection Topic Paper as a reason for not accommodating Gypsy and Traveller accommodation.

34. This inconsistency between the TLP and the ELP raises significant concerns in relation to soundness. Under paragraph 35 of the NPPF, a plan must be justified, that is, founded on proportionate evidence and the most appropriate strategy when considered against reasonable alternatives, and consistent with national and regional policy. The treatment of Meridian Water in the TLP evidence base fails both tests. It is not justified, since it relies on a mischaracterization of the ELP evidence base, and it is not in general conformity with LP21, which expects inclusive delivery of Traveller accommodation as part of major regeneration schemes.

35. In our view the TLP cannot be regarded as sound unless this inconsistency is addressed and the assessment of Meridian Water (PL5) is brought back into alignment with the evidence and policy framework of the Enfield Local Plan.

36. This inconsistency also raises wider questions about the Council's approach to the Duty to Cooperate and the management of unmet need. The Duty to Co-operate Statement (September 2025) makes clear that neighbouring authorities are unable to assist in accommodating Enfield's Traveller need. It follows that Enfield should first demonstrate that all reasonable options within its own urban and regeneration areas have been fully explored before releasing land from the Green Belt or Metropolitan Open Land. The decision to exclude Meridian Water, one of the few Council owned, accessible, and well-serviced regeneration sites, from consideration appears to contradict this principle. It undermines the credibility of the Council's assertion that no other suitable sites exist and weakens the basis of its "exceptional circumstances" case for Green Belt release. In short, the omission of Meridian Water from the site selection process is not consistent with the collaborative and evidence-led approach required by the Duty to Co-operate, nor with the spatial and sustainability objectives of the Enfield Local Plan.

4. Remedies sought

37. We respectfully request that:

a. The Council formally acknowledges and publishes the EnCaf Land Use Working Group's Regulation 18 submission and Appendix A – Call for Sites V5 FINAL 04112024 as part of the official evidence base.
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5. Reservation of rights

The EnCaf Land Use Working Group expressly reserves the right to reassert and rely upon all comments and evidence contained in our Regulation 18 submission (dated 4 November 2024), including our detailed Call for Sites and technical site assessments. For completeness, both documents are re-provided.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
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Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

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Submission of the Plan	✓	
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Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-68 (1 of 5).pdf
2. TLP19-68 (2 of 5).pdf
3. TLP19-68 (4 of 5).pdf
4. TLP19-68 (5 of 5).pdf
5. TLP19-68 (3 of 5).pdf

Bulls Cross Nursery (Site 1)

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
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1. Introduction

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3.Both our Regulation 18 representation and proposed sites have been re-provided and re submitted with this representation, as the comments remain valid.

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B. Consequences for Soundness

7. Because our submission and proposed sites were excluded from the evidence base, the TLP fails several tests of soundness under the National Planning Policy Framework (NPPF, 2024):

a. Not "Positively Prepared" (NPPF 35a) – the Council has not considered all reasonable options to meet Traveller needs within Enfield.

b. Not “Justified” (NPPF 35b) – the evidence base is incomplete and not based on proportionate evidence.

c. Not “Effective” (NPPF 35c) – long-term delivery depends on future masterplans at Crews Hill and Chase Park, whose deliverability remains uncertain.

d. Procedural fairness – our duly made representation has not been reported or acknowledged, contrary to NPPF 31 and the Council’s own Statement of Community Involvement (2023). While this omission may not amount to a direct breach of the statutory Duty to Co-operate, it does we believe, undermine the Council’s overall evidence of constructive and transparent engagement, which is central to demonstrating DtC
compliance.

C. Legal and procedural compliance

8. Under Regulation 18(3) and Regulation 19(1)(b), all representations received must be considered and reflected in the Council’s plan-making record. Omitting a valid submission and Call for Sites not only breaches the Regulations but also undermines transparency and confidence in the consultation process.

3. General Conformity with the London Plan

9. It appears to us that the TLP has not demonstrated the required general conformity with the London Plan 2021 (LP21). Under the Planning and Compulsory Purchase Act 2004 (s.24), all Development Plan Documents prepared by London boroughs must be in general conformity with the Mayor’s spatial development strategy. In practice, this means local plans must not conflict with the strategic intent of the London Plan and must help deliver its overall objectives of sustainable growth, social inclusion, and environmental protection.

10. We think that in preparing the TLP, the Council should have had clear regard to key LP21 policies, particularly H14 (Gypsy and Traveller accommodation), G2 (Green Belt), G3 (Metropolitan Open Land), and the broader strategic policies on connectivity, inclusivity, and
spatial sustainability (e.g., SD6, D3, H1, and T1–T4). These are the benchmarks for “general conformity.”

11. From our review, the Regulation 19 TLP conflicts with several of these strategic policies:

a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects sites to be accessible, sustainable, and well connected to health, education, and employment. The TLP allocates Bulls Cross, The Ridgeway, and A10 (Transit site), all edge-of-borough, low-PTAL Green Belt or MOL locations, remote from shops and services. This approach appears to run directly against the intent of H14 to promote inclusion and integration.

b. Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP21 allows boundary changes only in very exceptional circumstances and only where no suitable brownfield or urban sites exist. Despite our submission of twelve alternatives (many on Council-owned and/or brownfield land), the Council proposes to release two Green Belt sites and one MOL site for Traveller accommodation. Because our alternatives were never assessed, the Plan cannot in our view demonstrate that the G2/G3 tests have been met.

c. Strategic integration and inclusivity (Policies SD6 and H14A): LP21 promotes mixed, inclusive communities and integration across London’s urban fabric. By locating all new Traveller provision in remote, rural, and environmentally constrained areas, the TLP risks reinforcing segregation rather than fostering inclusion.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

4. Specific Site issues

Bulls Cross Nursery (CFS 284)

12. As a further example of the inconsistencies outlined above, we draw particular attention to the proposed allocation of Bulls Cross Nursery (CFS 284), which highlights serious issues with the Council's approach to site assessment, optimisation, and general conformity with LP21.

13. It appears that there is an inconsistency in the way the Bulls Cross Nursery site has been treated across the Council's evidence base. The Housing and Economic Land Availability Assessment (HELAA, 2023) for the main draft ELP identifies the site (CFS284) as potentially developable, recording an area of approximately 0.69 hectares and assessing it as capable of accommodating around 79 homes under the main Local Plan methodology. In contrast, the TLP describes the same site as being around 0.45 hectares and proposes it for only eight Traveller pitches.

14. This discrepancy in both site area and capacity is significant. If the land was judged suitable for 79 conventional dwellings in the HELAA, it is difficult to understand why it is now deemed suitable for only eight pitches.

15. The Council's own Site Selection Topic Paper (3.20) states that sites rejected for housing are "very unlikely to be suitable for Traveller accommodation," yet here a site previously rejected for housing is included, but at what appears to be a significantly reduced capacity.

16. We therefore question whether this allocation represents the optimum use of land, as required by LP21 Policy D3, and whether the site assessment has been applied consistently or transparently. In our view, this inconsistency undermines the robustness of the evidence base and raises concerns about whether the plan is justified, effective, and in general conformity with LP21.

17. On this basis, we think the proposed allocation fails the tests of soundness set out in paragraph 35 of the NPPF, in particular the requirements that the Plan be justified (an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence) and effective (deliverable and consistent with national policy). We therefore request that the Council provide clarification of the site boundary, the rationale for the reduced developable area, and the justification for such a low-intensity use relative to the HELAA findings, before the allocation proceeds.

18. Moreover, this inconsistency calls into question the credibility of the Council's wider approach to optimising urban capacity before releasing Green Belt land. If sites within the existing Green Belt are being used at sub-optimal densities, contrary to LP21 Policy D3 and the Council's own evidence base, then the claimed "exceptional circumstances" for Green Belt release cannot be said to rest on a sound or proportionate foundation.

19. This inconsistency also has implications for the Plan's general conformity with LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation). Both policies require boroughs to plan proactively for Traveller needs using a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities. The selection of Bulls Cross Nursery, previously ruled out for housing due to accessibility and isolation concerns, appears contrary to these requirements. The resulting allocation does not demonstrate that the site is well-located for services or that it has been assessed consistently with the broader housing strategy. In our view, this further undermines

the Plan's compliance with LP21 Policy H14 and Policy D3, and reinforces our concern that the TLP is not in general conformity with LP21 and does not satisfy the soundness tests of justification and effectiveness under paragraph 35 of the NPPF.

20. Taken together, these issues reinforce our wider concern that the TLP has not been prepared as an integrated or procedurally consistent part of the Enfield Local Plan, and that decisions about site suitability and capacity have not been applied fairly, transparently, or in accordance with the Council's stated methodology.

21. We therefore recommend that the Council reappraise the Bulls Cross Nursery allocation before submission of the TLP. This should include a review of the site boundary, developable area, and accessibility constraints, using the same parameters and density assumptions applied in the HELAA and the main Enfield Local Plan. If the Council continues to propose this site, it should clearly justify why the site is now considered suitable for Traveller use when previously rejected for housing and explain how the significantly reduced capacity accords with LP21 Policy D3 (Optimising Site Capacity) and Policy H14 (Gypsy and Traveller Accommodation).

22. In our view, this reappraisal should form part of a wider reconciliation exercise between the two plans to ensure that both the draft Local Plan and TLP apply a single, transparent methodology for site selection and capacity testing. Without this, the evidence base will remain inconsistent and the Plan risks failing the tests of soundness and procedural fairness under paragraph 35 of the NPPF.

Land at A10 / Edmonton Skate Park (Site 3)

23. The Council's proposed allocation of the A10 site for a transit facility accommodating up to 15 caravans relies upon extending the site into the adjoining public skate park to achieve safe access and turning area. Paragraph 5.20 of the Site Selection Topic Paper (September 2025) confirms that the existing site is too small and unsafe, and that "land to the west (currently occupied by a skate park) could be incorporated to extend the site." It further notes that "to avoid any net loss of open space, the skate park would need to be relocated "but that this is "being considered outside of the TLP process."

24. We think this approach is unsound and inconsistent with national and LP21 policy for several reasons:

a. Absence of up-to-date evidence: There is no current Playing Pitch Strategy (PPS) for Enfield. This same evidential gap has already hindered the main Local Plan examination. Without such evidence the Council cannot demonstrate that the skate park, or the open space it occupies, is surplus to requirements as required by NPPF 99 and London Plan Policy S5 (Sports and Recreation Facilities). The Regulation 19 TLP therefore lacks the necessary proportionate evidence base required by NPPF 31.
b. Unassessed loss of valued open space: By proposing the relocation "outside of the TLP process", the Council has excluded the environmental, social and cost implications of the skate park's removal from the sustainability appraisal and Integrated Impact Assessment. This undermines the Plan's justification and transparency, contrary to NPPF 35(b).
c. Failure to test reasonable alternatives: The absence of a current PPS means the Council cannot know whether other under-used recreation grounds (for example Churchfield Recreation Ground or similar sites) could accommodate the transit facility with less harm. The Plan therefore fails the "justified" test of soundness, as it cannot be shown that Site 3 is the most appropriate or least harmful option.

d. Conflict with earlier consultation evidence: At Regulation 18, numerous consultees, including ELUWG, highlighted that the skate park is well-used by young people, recently refurbished, and located adjacent to sensitive amenity areas. Those concerns have not been addressed; rather, the site has been expanded to include the amenity in question. This is procedurally and substantively flawed.

25. In short, the Council has not demonstrated that the loss of public open space or amenity is justified or deliverable, nor that the skate park relocation is secured or even feasible. The proposal therefore conflicts with NPPF 99–101, LP21 Policy S5, and Policy G3 (Open Space).

26. To render the Plan sound, ELUWG considers that one of the following modifications are needed:

a. Deletion or deferral of the Site 3 allocation pending completion of the Council's updated PPS to allow evidence-based evaluation of open-space capacity and alternative sites; or,
b. A modification to Policy TLP1 and the Site 3 Pro-forma requiring that: "No development shall take place until an up-to-date Borough-wide Playing Pitch Strategy and Open Space Assessment demonstrate that the existing skate park is surplus to requirements, and a replacement facility of equivalent or better quality and accessibility has been identified and secured and that no suitable alternative is available."

27. In our view, until this evidence is available, the allocation of Site 3 is not positively prepared, justified, effective, or consistent with national policy, and therefore fails the tests of soundness under NPPF 35.

Meridian Water (PL5)

28. Page 12 of the Traveller Local Plan Site Selection Topic Paper (September 2025) sets out why Meridian Water (PL5) was not considered a reasonable alternative for Traveller accommodation. It asserts that the Meridian Water masterplan is "highly structured", that "most land parcels are already committed through detailed planning permissions (e.g. Meridian One)" and that the Council's "delivery responsibilities and funding agreements with the GLA and central government" leave "no realistic residual land suitable for Traveller site provision without fundamentally compromising the project."

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Land at A10 (Site 3)

Comment Number: 3

Which document or part of the document are you commenting on?

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13. It appears that there is an inconsistency in the way the Bulls Cross Nursery site has been treated across the Council's evidence base. The Housing and Economic Land Availability Assessment (HELAA, 2023) for the main draft ELP identifies the site (CFS284) as potentially developable, recording an area of approximately 0.69 hectares and assessing it as capable of accommodating around 79 homes under the main Local Plan methodology. In contrast, the TLP describes the same site as being around 0.45 hectares and proposes it for only eight Traveller pitches.

14. This discrepancy in both site area and capacity is significant. If the land was judged suitable for 79 conventional dwellings in the HELAA, it is difficult to understand why it is now deemed suitable for only eight pitches.

15. The Council's own Site Selection Topic Paper (3.20) states that sites rejected for housing are "very unlikely to be suitable for Traveller accommodation," yet here a site previously rejected for housing is included, but at what appears to be a significantly reduced capacity.

16. We therefore question whether this allocation represents the optimum use of land, as required by LP21 Policy D3, and whether the site assessment has been applied consistently or transparently. In our view, this inconsistency undermines the robustness of the evidence base and raises concerns about whether the plan is justified, effective, and in general conformity with LP21.

17. On this basis, we think the proposed allocation fails the tests of soundness set out in paragraph 35 of the NPPF, in particular the requirements that the Plan be justified (an appropriate strategy, taking account of reasonable alternatives, and based on proportionate evidence) and effective (deliverable and consistent with national policy). We therefore request that the Council provide clarification of the site boundary, the rationale for the reduced developable area, and the justification for such a low-intensity use relative to the HELAA findings, before the allocation proceeds.

18. Moreover, this inconsistency calls into question the credibility of the Council's wider approach to optimising urban capacity before releasing Green Belt land. If sites within the existing Green Belt are being used at sub-optimal densities, contrary to LP21 Policy D3 and the Council's own evidence base, then the claimed "exceptional circumstances" for Green Belt release cannot be said to rest on a sound or proportionate foundation.

19. This inconsistency also has implications for the Plan's general conformity with LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation). Both policies require boroughs to plan proactively for Traveller needs using a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities. The selection of Bulls Cross Nursery, previously ruled out for housing due to accessibility and isolation concerns, appears contrary to these requirements. The resulting allocation does not demonstrate that the site is well-located for services or that it has been assessed consistently with the broader housing strategy. In our view, this further undermines

the Plan's compliance with LP21 Policy H14 and Policy D3, and reinforces our concern that the TLP is not in general conformity with LP21 and does not satisfy the soundness tests of justification and effectiveness under paragraph 35 of the NPPF.

20. Taken together, these issues reinforce our wider concern that the TLP has not been prepared as an integrated or procedurally consistent part of the Enfield Local Plan, and that decisions about site suitability and capacity have not been applied fairly, transparently, or in accordance with the Council's stated methodology.

21. We therefore recommend that the Council reappraise the Bulls Cross Nursery allocation before submission of the TLP. This should include a review of the site boundary, developable area, and accessibility constraints, using the same parameters and density assumptions applied in the HELAA and the main Enfield Local Plan. If the Council continues to propose this site, it should clearly justify why the site is now considered suitable for Traveller use when previously rejected for housing and explain how the significantly reduced capacity accords with LP21 Policy D3 (Optimising Site Capacity) and Policy H14 (Gypsy and Traveller Accommodation).

22. In our view, this reappraisal should form part of a wider reconciliation exercise between the two plans to ensure that both the draft Local Plan and TLP apply a single, transparent methodology for site selection and capacity testing. Without this, the evidence base will remain inconsistent and the Plan risks failing the tests of soundness and procedural fairness under paragraph 35 of the NPPF.

Land at A10 / Edmonton Skate Park (Site 3)

23. The Council's proposed allocation of the A10 site for a transit facility accommodating up to 15 caravans relies upon extending the site into the adjoining public skate park to achieve safe access and turning area. Paragraph 5.20 of the Site Selection Topic Paper (September 2025) confirms that the existing site is too small and unsafe, and that "land to the west (currently occupied by a skate park) could be incorporated to extend the site." It further notes that "to avoid any net loss of open space, the skate park would need to be relocated "but that this is "being considered outside of the TLP process."

24. We think this approach is unsound and inconsistent with national and LP21 policy for several reasons:

a. Absence of up-to-date evidence: There is no current Playing Pitch Strategy (PPS) for Enfield. This same evidential gap has already hindered the main Local Plan examination. Without such evidence the Council cannot demonstrate that the skate park, or the open space it occupies, is surplus to requirements as required by NPPF 99 and London Plan Policy S5 (Sports and Recreation Facilities). The Regulation 19 TLP therefore lacks the necessary proportionate evidence base required by NPPF 31.
b. Unassessed loss of valued open space: By proposing the relocation "outside of the TLP process", the Council has excluded the environmental, social and cost implications of the skate park's removal from the sustainability appraisal and Integrated Impact Assessment. This undermines the Plan's justification and transparency, contrary to NPPF 35(b).
c. Failure to test reasonable alternatives: The absence of a current PPS means the Council cannot know whether other under-used recreation grounds (for example Churchfield Recreation Ground or similar sites) could accommodate the transit facility with less harm. The Plan therefore fails the "justified" test of soundness, as it cannot be shown that Site 3 is the most appropriate or least harmful option.

d. Conflict with earlier consultation evidence: At Regulation 18, numerous consultees, including ELUWG, highlighted that the skate park is well-used by young people, recently refurbished, and located adjacent to sensitive amenity areas. Those concerns have not been addressed; rather, the site has been expanded to include the amenity in question. This is procedurally and substantively flawed.

25. In short, the Council has not demonstrated that the loss of public open space or amenity is justified or deliverable, nor that the skate park relocation is secured or even feasible. The proposal therefore conflicts with NPPF 99–101, LP21 Policy S5, and Policy G3 (Open Space).

26. To render the Plan sound, ELUWG considers that one of the following modifications are needed:

a. Deletion or deferral of the Site 3 allocation pending completion of the Council's updated PPS to allow evidence-based evaluation of open-space capacity and alternative sites; or,
b. A modification to Policy TLP1 and the Site 3 Pro-forma requiring that: "No development shall take place until an up-to-date Borough-wide Playing Pitch Strategy and Open Space Assessment demonstrate that the existing skate park is surplus to requirements, and a replacement facility of equivalent or better quality and accessibility has been identified and secured and that no suitable alternative is available."

27. In our view, until this evidence is available, the allocation of Site 3 is not positively prepared, justified, effective, or consistent with national policy, and therefore fails the tests of soundness under NPPF 35.

Meridian Water (PL5)

28. Page 12 of the Traveller Local Plan Site Selection Topic Paper (September 2025) sets out why Meridian Water (PL5) was not considered a reasonable alternative for Traveller accommodation. It asserts that the Meridian Water masterplan is "highly structured", that "most land parcels are already committed through detailed planning permissions (e.g. Meridian One)" and that the Council's "delivery responsibilities and funding agreements with the GLA and central government" leave "no realistic residual land suitable for Traveller site provision without fundamentally compromising the project."

29. We find this reasoning at odds with the evidence contained in the Enfield Local Plan (ELP). Meridian Water is indeed a major regeneration area, but the ELP does not commit to or plan for the delivery of over 10,000 homes within the plan period to 2041. The ELP proposes approximately 6,700 dwellings to 2041, and fewer than 9,000 in total even if development continues beyond that period. The over "10,000 homes" figure cited in the Topic Paper therefore represents an aspirational long-term capacity, not a deliverable or funded commitment.

30. The TLP's assumption that Meridian Water is "fully committed" to 10,000 homes and incapable of accommodating a Traveller site is therefore factually inaccurate. Moreover, the Council is both majority landowner, owning around 70% of the developable land, and master-developer for the scheme. This gives the Council significant control over the form and phasing of development, and therefore the ability, should it choose, to integrate a small number of permanent or transit Traveller pitches within this strategic site.

31. Notwithstanding this, the council's recent submissions to the hearings of the main local plan identifies significant previously unconsidered challenges with the masterplanning of the southern section of Meridian east – notably the council has recognized that underground water infrastructure places considerably constraints on the type and scale of development possible. Given this, a re-assessment of the scope for delivering permanent, transit or meanwhile pitches at Meridian Water is needed.

32. The Topic Paper's conclusion is also inconsistent with the policy framework of LP21 Policy H14 which requires boroughs to plan positively for Gypsy and Traveller accommodation and to integrate provision within their overall housing and placemaking strategies. Given that Meridian Water is a publicly led regeneration project of strategic importance, it would be both logical and equitable for a small part of this site to contribute towards meeting Enfield's identified need, rather than excluding it entirely.

33. In this context, it appears unreasonable that other potential placemaking areas such as Crews Hill and Chase Park are described as "reasonable alternatives" for Traveller provision, while Meridian Water, a site with superior accessibility, services, and under Council control, is dismissed on grounds which are neither supported by the ELP evidence base nor consistent with the Mayor's spatial strategy for inclusive growth. To be clear, the three adopted or approved masterplans for Meridian Water are all based on the delivery of 5,000 homes, none propose "over 10,000 new homes", as cited on page 12 of the Site Selection Topic Paper as a reason for not accommodating Gypsy and Traveller accommodation.

34. This inconsistency between the TLP and the ELP raises significant concerns in relation to soundness. Under paragraph 35 of the NPPF, a plan must be justified, that is, founded on proportionate evidence and the most appropriate strategy when considered against reasonable alternatives, and consistent with national and regional policy. The treatment of Meridian Water in the TLP evidence base fails both tests. It is not justified, since it relies on a mischaracterization of the ELP evidence base, and it is not in general conformity with LP21, which expects inclusive delivery of Traveller accommodation as part of major regeneration schemes.

35. In our view the TLP cannot be regarded as sound unless this inconsistency is addressed and the assessment of Meridian Water (PL5) is brought back into alignment with the evidence and policy framework of the Enfield Local Plan.

36. This inconsistency also raises wider questions about the Council's approach to the Duty to Cooperate and the management of unmet need. The Duty to Co-operate Statement (September 2025) makes clear that neighbouring authorities are unable to assist in accommodating Enfield's Traveller need. It follows that Enfield should first demonstrate that all reasonable options within its own urban and regeneration areas have been fully explored before releasing land from the Green Belt or Metropolitan Open Land. The decision to exclude Meridian Water, one of the few Council owned, accessible, and well-serviced regeneration sites, from consideration appears to contradict this principle. It undermines the credibility of the Council's assertion that no other suitable sites exist and weakens the basis of its "exceptional circumstances" case for Green Belt release. In short, the omission of Meridian Water from the site selection process is not consistent with the collaborative and evidence-led approach required by the Duty to Co-operate, nor with the spatial and sustainability objectives of the Enfield Local Plan.

4. Remedies sought

37. We respectfully request that:

a. The Council formally acknowledges and publishes the EnCaf Land Use Working Group's Regulation 18 submission and Appendix A – Call for Sites V5 FINAL 04112024 as part of the official evidence base.
b. The Council assesses all twelve proposed sites using the same methodology applied to the Council's own sites.
c. The Inspector directs Main Modifications to: correct the record that "no new sites were submitted in 2024"; reappraise the exceptional circumstances for Green Belt and MOL releases; and reconsider the allocations in light of the omitted alternatives.

d. Failing these corrections, the Plan should, in our view, be found unsound.

5. Reservation of rights

The EnCaf Land Use Working Group expressly reserves the right to reassert and rely upon all comments and evidence contained in our Regulation 18 submission (dated 4 November 2024), including our detailed Call for Sites and technical site assessments. For completeness, both documents are re-provided.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 69 - Polydoros Pitsillides

Respondent: Polydoros Pitsillides

Submission Number:69

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I have just been informed by a neighbour about Enfield Council's proposed plan to turn the skateboard park that adjoins Edmonton Cemetery, into a temporary traveller site. Firstly, let me begin by saying this is the first I have heard of this proposal as I have received nothing by the way of notification from Enfield council.

I wish to object to this planned proposal on the following grounds:

1) Having a traveller site (although not illegal) situated by a busy road (in this case the A10 Great Cambridge Road) is both hazardous and dangerous!

2) The planned site I consider to be undesirable and dangerous, with health standards highly likely to be breached and I believe official standards advise against it.

3) [redacted]

4) The youth of the borough will have one of their few recreational pursuits taken away from them.

5) I also believe that the Skateboard site is stipulated Metropolitan Open Land which is given the same status as Greenbelt Land. As such it is intended to be protected as an area of landscape, recreation, nature conservation or scientific interest.

5) [redacted]

I am not against travellers having their own site albeit temporary or permanent, but in this instance I sincerely believe that this matter has not been properly thought out. I therefore call on Enfield council to reconsider and not go ahead with this proposed plan.

I am also copying in councillor Pat Gregory on this email as I have been made aware she is also passionate on this particular subject.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-69.pdf

TLP19- 70 - Gina Stone

Respondent: Gina Stone

Submission Number:70

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land as A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I have tried several times to upload my comments on your website with the links below, but I keep getting errors and I do not know if my comments have been submitted or not?!

Therefore I am emailing this now!

After visiting Ridge Ave library and speaking with [redacted](Planning officers) I felt he could not answer several questions I raised when I looked at the plans!

[redacted] told me that there would be no trouble a site Manager will be appointed by the Council full time for the site. [redacted] Will this person have be contactable at all times 24/7 in the event of any issues/trouble? How long will this post be appointed for, is it a full time contract?

First I was told up to 8 caravans, then 15? On the A10 plot.

The Plan Reg 19 / site entrance is not justified as the plan does not take into account sufficient evidence about road safety risks on the A10. The proposed plan will worsen existing safety problems by increasing traffic volumes or access points. The site 3 entrance is situated just after the

designated bus stop, whilst a bus pulls into this stop drivers behind are not able to see if there are any vehicles cars or caravans pulling out at the designated entrance straight onto the A10. [redacted]Has the council consulted Transport for London if this is legally compliant with road safety action plans and strategic road network requirements? I do feel that this is not legally compliant.

There is no filter lane here.

The A10 has a long history of serious and fatal collisions. Speeding, poor crossings and inadequate junction design create danger for pedestrians, cyclists, and motorists. [redacted]

I strongly object to the Enfield local plan regulation 19 on the grounds that it fails to adequately address serious and ongoing road safety issues along the A10. The A10 is already one of the most dangerous roads in the borough!

This plan proposes additional development and increased traffic along this route without sufficient evidence of how safety will be improved or mitigated.

This is not justified by available evidence provided. The councils evidence does not demonstrate how the plan will achieve measurable safety improvements, nor does it incorporate commitments from Transport for London to redesign dangerous junctions.

Refuge van collections, deliveries, Caravans pulling in & out of the skate park onto the A10 will cause havoc.

[redacted]

I strongly object to the proposed closure of the skate park which serves as a vital community facility for children and young people in Enfield.

The skate park provides a safe, space for exercise, socialising developing positive habits. Closing it would remove on the of few free recreational spaces available to young people in our area, pushing them onto streets or unsafe spaces instead! This contradicts the National planning policy framework which promotes healthy and safe communities. The Enfield Local plan objectives to enhance youth provision and active lifestyles. Have the council engaged with local users, parents and schools to discuss this further?

Also the plans showed cutting down trees and taking out green spaces for our community. Increasing pollution.

I was told [redacted] that families of the travellers would have adequate play space built around. So taking away the skate park from children who actually live in the borough whose parents pay their council tax, it is then taken away? How can that in itself be justified?

I would like to be fully kept up to date with any future meetings or decisions.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-70.pdf

TLP19- 71 - steven williams

Respondent: steven williams

Submission Number:71

Submission Date:04/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted]this proposal is totally unacceptable.

The roads through Bulls cross not suitable & the fact its is a conservation area [redacted]

The plan will impact on many people who use the green space which as you now is diminishing in the local area.

Please reconsider.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-71.pdf

TLP19- 72 - Jonathan Landi

Respondent: Jonathan Landi

Submission Number:72

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I attended the consultation at the Enfield Civic Centre (October 24 10am to 1pm) and thank you for taking the time and trouble to answer my questions. We had a full and frank exchange of views on the above topic. Having now heard both sides of the argument, I'm still struggling to understand the logic of siting a traveller transit camp at the above location. My reasons are as follows:

SKATE PARK: REASONS FOR IT TO REMAIN WHERE IT IS

- The land enjoys designated protected Metropolitan Open Land status and is much valued and popular community facility used by local youth, and particularly at weekends.
- Its current location (near a bus stop and schools) renders it readily accessible to local youth
- It's invaluable as an additional resource as regards preventing youth crime and conforms to the national/ Mayor of London guidelines in these areas

- It complements the leisure/recreational nature of the nearby and popular Firs Farm Wetlands of which Enfield Council is a partner
- I find it unsatisfactory that Enfield Council was unable to elaborate (at time of writing) as to where the skate park would be relocated to?

UNSUITABLE LOCATION/ACCESSIBILITY

- It's a small site (0.31 hectares) which would fill up very quickly.
- I draw the council's attention to page 28 of the GTANA which highlights the need: "to locate such sites away from contentious public spaces".
- Adjacent to a very busy road and only accessible via the northbound and often congested section of the A10.
- Associated problems of pollution emanating from car/HGV emissions and so potential to cause health issues for the site's occupants.
- [redacted]
- Problems associated with large vehicles (less than five tonnes) turning into the
- site/leaving a very busy dual carriage way i.e. potential for increased congestion/tail backs.
- Five tonne limit wouldn't apply in the case of travelling show people according to the council proposal.
- Vehicles leaving the site and heading southbound tra [illegible] (towards A406) will need to make a detour via local roads to do this.

LOCAL COMMUNITY

- [redacted]

So, I would respectfully submit that the A10 scheme should be shelved.

Thanking you for your attention

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-72(1 of 2).pdf
2. TLP19-72(2 of 2).pdf

TLP19- 73 - Helen Helen

Respondent: Helen Helen

Submission Number:73

Submission Date:04/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Regarding the proposed plans for a travellers site at Bulls Cross, I would like to make my views known.

1) [redacted]

2) Have you not got another site that can be used? Instead of using Green Belt Land.

3) There is a lot of Heritage sites locally which this would affect.

4) [redacted]

5) We are close to the M25, which causes a lot of problems, regarding traffic and using the local Estate as a rat run.

6) The roads near the proposed site are narrow and[redacted]

I hope you will take into account the problems that it would cause.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-73.pdf

TLP19- 74 - Wendy Fulker

Respondent: Wendy Fulker

Submission Number:74

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

A10

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted].

> The Skatepark is an excellent amenity for lovers of skateboarding. Skateboarding keeps youngsters occupied, meet socially and stops them being bored which is when they get into trouble and find anti social and illegal pursuits.

> Our son loved skateboarding and did it for many years.
> From 2 very concerned residents.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-74.pdf

TLP19- 75 - Caroline Power

Respondent: Caroline Power

Submission Number:75

Submission Date:04/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

A10 site

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to object for the following reasons:-

* The choice of location is inappropriate and totally disrespectful to myself & others who have family and friends buried in the adjacent Edmonton Cemetery.

* A cemetery is supposed to be a place of peace & serenity for those attending funerals and those tending graves of loved ones. Instead Enfield Council think it is acceptable to have [redacted]

* Major concerns the cemetery will be used to [redacted]

* A brownfield site should be used instead not an existing skateboard park that is, as far as I'm aware, the only one in
the borough. Yet another sporting amenity being taken from young people.

* Site next to the busy A10 is a danger to traveller families. Air pollution harmful to children.

* No explanation given as to what a transit site means. How many people will it house in this small site & are there future plans to expand the area?

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-75.pdf

TLP19- 76 - Angela & Nigel Cohen

Respondent: Angela & Nigel Cohen

Submission Number:76

Submission Date:04/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We are writing to register our objection to the proposed permanent Traveller site (TLP-03) on Green Belt land adjacent to The Ridgeway, EN2 8AE, as outlined in the London Borough of Enfield's draft Traveller Local Plan (Regulation 18, Part 2).

While we understand and respect the importance of providing appropriate accommodation for the Gypsy and Traveller community, we believe the proposed site at The Ridgeway is wholly unsuitable for a number of serious reasons.

1. Unsafe and Inadequate Access
The proposed site is located on a busy and fast stretch of The Ridgeway (A1005), where visibility is severely restricted due to a blind rise and bend in the road. Turning into or out of the site would pose significant safety risks for both residents and other road users.

There are also no safe pedestrian crossings or continuous pavements. The only public transport option is the 313 bus, which runs infrequently and does not provide realistic access to essential local services.

This lack of safe and sustainable transport options means the site cannot be considered suitable for residential occupation.

2. Lack of Essential Services and Infrastructure
The proposed location is more than two miles from the nearest schools, healthcare, shops, and other necessary community facilities. This isolation would make daily life extremely difficult for residents and would not support community integration or inclusivity.

Basic infrastructure is also lacking. Water pressure is already poor, and there are no mains drainage, gas, or internet connections in the area. Existing homes rely on cesspits, and any attempt to upgrade these services would require significant infrastructure work — at high cost and with considerable environmental disruption.

3. Environmental Unsuitability
The land is prone to flooding and remains waterlogged for much of the year, making it inappropriate for permanent development. Its small and irregular shape further restricts safe access, the provision of facilities, and adequate space for a permanent Traveller community.

This location fails to meet the practical and environmental standards required for a safe, sustainable site.

4. Protection of the Green Belt
The site lies within the protected Green Belt, where development of this kind is deemed "inappropriate" under the National Planning Policy Framework (NPPF). Such proposals should only be approved in "very special circumstances," which clearly do not exist here.
Building on this land would cause significant harm to the openness and character of the countryside, undermining both local and national commitments to protect the Green Belt.

Once lost, this open space cannot be reclaimed.

5. More Suitable Alternatives Are Available
It is deeply concerning that Enfield Council has chosen to pursue development on Green Belt land when it owns or controls a number of far more appropriate sites, such as:

• Meridian Water, Edmonton — a large, well-connected residential area with schools, shops, healthcare, and public transport links already in place.
• The former B&Q; Colosseum Retail Park (Southbury Road/A10) — another council-owned site with the infrastructure and services necessary for a sustainable Traveller community.

Both locations could accommodate Enfield's Traveller site requirements without damaging the environment or endangering public safety. It is difficult to understand why these viable options have been disregarded.

Conclusion
For all of the reasons outlined above — unsafe access, lack of services, environmental unsuitability, Green Belt harm, and the availability of better alternatives — we strongly oppose the allocation of Site TLP-03 in the draft Traveller Local Plan.

We urge Enfield Council to withdraw this proposal and instead identify appropriate locations within established residential areas that offer safety, infrastructure, and community integration.
Thank you for your attention to our concerns. Please confirm that this objection has been received and recorded as part of the consultation process.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-76.pdf

TLP19- 77 - Ms Lisa Peters

Respondent: Ms Lisa PetersPeters, Francis, Kurt

Submission Number:77

Submission Date:04/11/2025 19:39 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Traveller Local Plan as a whole with reference to the land adjacent to Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please see attached PDF.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please see attached PDF.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached PDF.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To advocate for the views expressed in the attached

PDF of our residents group.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-77.pdf

TLP19- 78 - Michael Browne

Respondent: Michael Browne

On-behalf of: Michael Browne

Submission Number:78

Submission Date:04/11/2025 20:58 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
  Integrated Impact Assessment
  A particular section of the Traveller Local Plan
  A specific site or allocation in the Traveller Local Plan
  A specific policy in the Traveller Local Plan
  A paragraph or set of paragraphs in the Traveller Local Plan
  Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

All paragraphs relating to the A10 site

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

It seems to me that the proposal to replace the existing skate park facility available for use by existing residents of the area fails to take into account the needs of the local community sufficiently. I consider that the location is unsuitable due to the impact on traffic at the proposed location, with the vehicular access point being located immediately next to a busy junction and a bus stop.

The Edmonton skate park is the only public skate park in the area. By definition, users are likely to travel on foot/skateboard to reach it and removing this valuable public sports and recreation facility will therefore have a negative effect on the health and well-being of local residents. Moreover, skateboarding is a sport that is well known to appeal to younger people, and thus the removal of this important asset unfairly and disproportionately impacts younger people (who are less likely and less well equipped to advocate for themselves). In that regard, my own young children (6 & 10) have used the edmonton skate park many times over a number of years. They have taken up skateboarding as a direct result of being inspired by seeing other users of the park on their doorstep, which made it clear to them that this is an accessible sport for them and not just for others in more privileged areas or which require a car to travel to. They are devastated by the news that the local council wishes to take this important facility away from them and other local skaters.

I am astounded that the present proposal to remove this important public asset follows so shortly after significant public funds were invested in updating and improving the site around 5 years ago. That investment followed a previous proposal to extend the cemetery on both the old tennis courts and skate park adjoining the plot. However, the skate park was ultimately preserved and indeed renovated following that consultation. I find it difficult to understand why this site would therefore be proposed for redevelopment at this time, having previously been judged unsuitable for extension of the cemetery and public money invested in its improvement for the benefit of the local community. I have seen no reference to this in the consultation documents and therefore conclude it has either not been taken into account, or otherwise unreasonably dismissed.
So far as access is concerned, the A10 is very busy road at all times of day and night, with the church road junction being a particular hot spot. Adding access to a significant traveler site as proposed will clearly exacerbate this situation.

I am also concerned about the impact for bus users, particularly late at night, which I cannot see has been taken into consideration in the consultation papers.

In summary, I consider that the proposed A10 site would unfairly and unnecessarily remove a valuable existing facility for existing, permanent residents in the area, particularly young people and is also likely to have a significant negative impact on local travel infrastructure.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I would like to see the A10 site removed from the proposal and a suitable site which does not involve the removal of a valuable existing laudable community asset found as an alternative.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 79 - Ms Amanda Martin

Respondent: Ms Amanda Martin

Submission Number:79

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

You are considering locations which are not practical for travellers to be part of a community and in the case of Bulls Cross they would be isolated from schools, shops and amenities they can access easily other than a local pub.

Noise - The neighbouring land is a playing field and the which has a number of lets involving young people and parents so is often noisy, along with the MUGA which has groups using it every night and again they are loud. This would disturb people living on the adjacent site. There is also the football club which backs onto the area which also has a lot of young people taking part in activities and this creates noise.

There are 2 schools which are in close proximity to the area, Capel Manor and St Ignatius both of which will have children playing in the grounds during the day, this ill also cause a disturbance.to people resident on this site.

Schools - The local secondary school is a single sex boys school and whilst it is catholic is generally full in all year groups. It is a considerable walking distance to Lea Valley Academy using the underpass which I am not keen on and I am sure traveller families would not be happy to have there daughters walking to, if they attend school. The pavements are extremely narrow and not good to walk along given how rarely the council cuts the hedges back. The walk along Turkey Street is quite dark at the best times as well to get to the A10 on foot.

Traffic, every night from about 4.45 there is a traffic leaving up to the roundabout at Bulls Cross, the residents access would be severely compromised and it is very frustrating to have that level of noise, pollution every day. Enfield Council has done nothing to improve this for current residents, it is unlikely you will look at this for 8 more families. When there is a problem on the M25 the whole area grounds to a halt. Last week, Tuesday the traffic was still queuing until 9pm as a result of a problem. This is without the additional 21000 homes proposed in the area.

The site is located within a designated conservation zone and Enfield is already looking a destroying enough green land to not ruin this as well.

I am surprised that the capacity allows for 8 sites given how small the location is, I would imagine 3/4 would be more realistic and then is this upset worth it for such a small number of sites given the cost in laying on water - mind you there has been a leaking water main there for weeks which has not been fixed.

There are protected trees in the area and these need to be conserved and monitored if you did allow the area to be used to ensure they are not damaged or cut down illegally.

I do not believe you have given enough consideration to the listed properties in the area and the affect putting a smally traveller site in would have.

The most important consideration is how isolated these families could be in such a location

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

The council's crude average pitch size calculation ignores site shape, single access, tree constraint and root protection, critical fire separation and on-site management facility requirements. The councils capacity is over-stated and the allocation would not be deliverable in a manner compliant with critical BRE Safety guidance, design standard and NPPF policy

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To look at using sites which are more robust and would give the traveller families the facilities they need.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		✓
Start of the examination		✓
Schedule of Main modifications stage (following hearings)		✓
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 80 - Claire Martin

Respondent: Claire MartinLee Valley Regional Park Authority

Submission Number:80

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 4 , proforma 1

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The Lee Valley Regional Park Authority (the Authority) has concerns about the allocation and deliverability of Site 1 due to the impacts this could have on the character and attractiveness of Myddelton House Gardens and the Forty Hill conservation area. The Authority owns and operates Myddelton House Gardens on Bulls Cross as a visitor attraction both to showcase the Grade II Registered Park and Garden which is open to the public all year round and to introduce visitors to the wider Regional Park, a significant part of which lies within the London Borough of Enfield. In the last two years April to March 2023/24 and April to March 2024/25 the Gardens have seen approx. 45,000 visitors each year. The head office for the Regional Park Authority is also located within the Gardens, accommodated within Myddelton House, itself a Grade II listed building.

As described in the Site Allocation Proforma, Site 1 lies opposite Myddelton House Gardens (the Gardens) within the Forty Hill Conservation Area. Access into Site 1 is taken from BullsCross (the A105 road) at a point just to the north of the main vehicle and pedestrian entry to the Gardens. Bulls Cross is an attractive tree lined entrance route into the Gardens, and this framework of mature trees contributes to the seclusion and sense of tranquillity within the Gardens themselves. The pavement which runs along the eastern side of Bulls Cross (same side as the entrance into Site 1) is narrow, as is the width of the road itself.

The Site specific design principles recognise the sensitivity of the location in terms of landscape and historic character and its accessibility from the highway. They require development of the site to enable vehicles to safely access and manoeuvre within the site, retain existing railings at the entrance to the site and retain and/or enhance boundary planting. Whilst these principles are welcomed there is concern that significant changes will need to be made to enable access into the site particularly if this is to cater for a range of vehicles, trailers and mobile homes. This will require the removal of boundary railings and existing mature trees. Design requirements propose that development is informed by a tree survey. Given the vegetated nature of the site and importance of the tree lined boundary to the character of the adjacent Gardens and wider area this should have been undertaken from the outset to ensure access could be achieved and the 8 pitches accommodated without negative impact.

The proposed layout for the Site included in the TLP Site Capacity Assessment suggests that a significant number of trees including those along the boundary of the site would need to be removed to accommodate the 8 pitches. The proposed placement of the community building adjacent to the site frontage with Bulls Cross is likely to require both the removal of the existing railings and mature trees. It is not clear how this layout can meet the design principle to conserve and enhance the historic environment and contribute to the conservation area. Any changes to the tree lined approach to the Gardens due to the loss of boundary trees or the opening up of the existing Site access point will change the attractive and secluded character of the approach and entrance into the Gardens experienced by visitors, with associated impacts on the Conservation Area.

There is also concern about the impact on visitor safety particularly for those walking or cycling to the Gardens using the pavement alongside Bulls Cross which passes immediately in front of the only point of access to the proposed Site. Development and occupation of the Site (currently for a minimum of 8 pitches) will generate additional traffic and vehicle movements including the need to negotiate what appears to be a narrow entrance point onto the Site. This is of concern due to the narrowness of both Bulls Cross and the pavement alongside, which runs past the Site

entrance. The pavement provides the only pedestrian route into the Gardens and requires people to walk in single file due to the lack of space. Bulls Cross itself is also at regular times a heavily congested road, for example during the pick-up and drop-off times for children attending the nearby school or when there are problems on the A10. Unfortunately, figures are not available for the number of visitors that walk to the Gardens but as a free, family friendly open space (there is a car parking charge) with a café, people, usually in small groups are regularly seen walking along the pavement before crossing over the road to access the Gardens.

Whilst the Authority recognises that Enfield Council need to allocate sufficient land to meet the identified needs of Travellers within the borough, the proposed allocation of Site 1 Bulls Cross Nursery raises significant concerns in relation to the safety and amenity of visitors using Bulls Cross to access Myddelton House Gardens.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Additional Site Specific Design Principles could be added to the Site Allocation, but it is unlikely these could overcome the issue of pedestrian safety for visitors to Myddelton House Gardens given the existing infrastructure – in particular the width of the pavement and narrowness of Bulls Cross. Likewise, the Design Principles already require a Tree Survey, but this should have been undertaken to better inform the capacity and access arrangements for the allocation. General observation of the Site and comparison with the proposed layout in the Site Capacity Assessment suggest the Site as envisaged is not deliverable.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-80 (1 of 2).pdf
2. TLP19-80 (2 of 2).pdf

TLP19- 81 - Ann & Gordon Hutchinson

Respondent: Ann & Gordon Hutchinson

Submission Number:81

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We have considered the council's proposals for a Traveller site on the Bulls Cross nursery site, together with the detailed submission from the Forty Hall and Bulls Cross Study Group, and have reached the conclusion that the site is completely unsuitable. We, therefore firmly oppose the proposal and ask the council to withdraw it.

The site is too small and the wrong shape, while the entrance from Bulls Cross would be difficult and potentially dangerous for travellers' vehicles, given the heavy morning and evening traffic. There is also no easy access to local shops and services. We are particularly concerned at the potential loss of so many trees along the boundaries of the site, including those fronting Bull Cross itself.

We also agree that it would be wrong for such a site to be placed in a conservation area and so close to Myddelton House and gardens and near other heritage sites. [redacted] this also seems wrong for a conservation area.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-81.pdf

TLP19- 82 - Andreas Avgoustis

Respondent: Andreas Avgoustis

Submission Number:82

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

im opposed to your proposal to convert the skatepark next to church street Edmonton Cemetery into traveller transit site.There are plenty of other places to do that .Don't destroy our childrens future

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-82.pdf

TLP19- 83 - Marino Charalambous

Respondent: Marino Charalambous

Submission Number:83

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at the A10

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please find attached my formal Regulation 19 representation in relation to Site TLP_09 – Land at A10 (Skate Park) within the Enfield Traveller Local Plan (Submission Version, September 2025).

This submission objects to the proposed allocation on grounds of unsoundness and legal non-compliance under paragraph 35 of the National Planning Policy Framework and the Environmental
Assessment of Plans and Programmes Regulations 2004.

I would be grateful if you could confirm receipt of this representation and ensure it is included in full for consideration at the Examination-in-Public.

I would also like to draw your attention to significant accessibility and usability issues with the online consultation portal.

The webpages do not appear to comply with W3C accessibility standards, and the process for lodging comments is unnecessarily complex — users are repeatedly redirected between pages, which makes submission difficult and risks excluding residents with limited digital confidence or accessibility needs.

Given the importance of this statutory consultation, I respectfully request that Enfield Council ensures the online consultation process meets accessibility requirements and provides a clear, direct means for residents to submit representations.

Section 2 – Representation Details
Policy / Site reference: TLP_09 – Land at A10, Skate Park
Type of site: Transit provision for up to 15 caravans
Document section: Traveller Local Plan – Policy TLP1 / Site Allocations
Section 3 – Legal Compliance
This representation asserts that the Plan is not legally compliant, as required under the Environmental Assessment of Plans and Programmes Regulations 2004. Specifically, the Integrated Impact Assessment (IIA) fails to demonstrate consideration of reasonable alternatives (Reg. 12(2)(b)) and does not adequately evaluate the site-specific impacts of TLP_09 on air quality, noise, and community safety.
Section 4 – Tests of Soundness

1. Not Justified – The A10 Skate Park site was selected primarily because it is Council-owned, without sufficient evidence that alternative brownfield or non-Green Belt sites were properly assessed. This fails the NPPF requirement that plans should be the most appropriate strategy when considered against reasonable alternatives.

2. Not Effective / Deliverable – The site’s proximity to the A10 dual carriageway exposes potential residents to unacceptably high levels of air and noise pollution. Traveller caravans lack insulation and therefore fail to meet the Planning Policy for Traveller Sites (2015, para 13(c)) requirements for healthy and safe living conditions.

3. Not Consistent with National Policy – The proposal conflicts with Planning Policy for Traveller Sites (2015) and London Plan Policy G4, which protect community open space and require healthy living environments. The location risks undermining community cohesion and safety due to the site’s current recreational use.

4. Procedural Deficiencies – The IIA's reliance on straight-line distances for accessibility, rather than realistic walking routes, produces misleading assessments of proximity to services and public transport. The omission of a detailed Community Safety Impact Assessment further undermines compliance with statutory requirements.
Section 5 – Requested Change
Delete Site TLP_09 (Land at A10, Skate Park) from the Traveller Local Plan due to unsoundness and non-compliance with the legal requirements of the SEA Regulations and NPPF paragraph 35.
Section 6 – Examination-in-Public

Do you wish to appear at the Examination-in-Public to present your representation?
☒Yes ☒No
Reason: To provide evidence on the environmental, health, and community impacts of the proposed A10 Skate Park site.
Section 7 – Declaration

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide evidence on the environmental, health, and community impacts of the proposed A10 Skate Park site.
Section 7 – Declaration

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-83(2 of 2) main_.pdf
2. TLP19-83.pdf

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at the A10

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please find attached my formal Regulation 19 representation in relation to Site TLP_09 – Land at A10 (Skate Park) within the Enfield Traveller Local Plan (Submission Version, September 2025).

This submission objects to the proposed allocation on grounds of unsoundness and legal non-compliance under paragraph 35 of the National Planning Policy Framework and the Environmental
Assessment of Plans and Programmes Regulations 2004.

I would be grateful if you could confirm receipt of this representation and ensure it is included in full for consideration at the Examination-in-Public.

I would also like to draw your attention to significant accessibility and usability issues with the online consultation portal.

The webpages do not appear to comply with W3C accessibility standards, and the process for lodging comments is unnecessarily complex — users are repeatedly redirected between pages, which makes submission difficult and risks excluding residents with limited digital confidence or accessibility needs.

Given the importance of this statutory consultation, I respectfully request that Enfield Council ensures the online consultation process meets accessibility requirements and provides a clear, direct means for residents to submit representations.

Section 2 – Representation Details
Policy / Site reference: TLP_09 – Land at A10, Skate Park
Type of site: Transit provision for up to 15 caravans

Document section: Traveller Local Plan – Policy TLP1 / Site Allocations
Section 3 – Legal Compliance
This representation asserts that the Plan is not legally compliant, as required under the Environmental Assessment of Plans and Programmes Regulations 2004. Specifically, the Integrated Impact Assessment (IIA) fails to demonstrate consideration of reasonable alternatives (Reg. 12(2)(b)) and does not adequately evaluate the site-specific impacts of TLP_09 on air quality, noise, and community safety.
Section 4 – Tests of Soundness

1. Not Justified – The A10 Skate Park site was selected primarily because it is Council-owned, without sufficient evidence that alternative brownfield or non-Green Belt sites were properly assessed. This fails the NPPF requirement that plans should be the most appropriate strategy when considered against reasonable alternatives.

2. Not Effective / Deliverable – The site's proximity to the A10 dual carriageway exposes potential residents to unacceptably high levels of air and noise pollution. Traveller caravans lack insulation and therefore fail to meet the Planning Policy for Traveller Sites (2015, para 13(c)) requirements for healthy and safe living conditions.

3. Not Consistent with National Policy – The proposal conflicts with Planning Policy for Traveller Sites (2015) and London Plan Policy G4, which protect community open space and require healthy living environments. The location risks undermining community cohesion and safety due to the site's current recreational use.

4. Procedural Deficiencies – The IIA's reliance on straight-line distances for accessibility, rather than realistic walking routes, produces misleading assessments of proximity to services and public transport. The omission of a detailed Community Safety Impact Assessment further undermines compliance with statutory requirements.
Section 5 – Requested Change
Delete Site TLP_09 (Land at A10, Skate Park) from the Traveller Local Plan due to unsoundness and non-compliance with the legal requirements of the SEA Regulations and NPPF paragraph 35.
Section 6 – Examination-in-Public

Do you wish to appear at the Examination-in-Public to present your representation?
☒Yes ☒No
Reason: To provide evidence on the environmental, health, and community impacts of the proposed A10 Skate Park site.
Section 7 – Declaration

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To provide evidence on the environmental, health, and community impacts of the proposed A10 Skate Park site.
Section 7 – Declaration

TLP19- 84 - Tom Glover

Respondent: Tom Glover

Submission Number:84

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to object to the proposed allocation TLP_01 – Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. The allocation is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy. I endorse the detailed submission made by the Forty Hill and Bulls Cross Study Group.

1. Green Belt and Local Open Space:

The Bulls Cross site's release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Sustainability Appraisal records "significant negative" effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:

The Plan overprovides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy. There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less constrained sites could meet the Borough's needs without causing such material harm to the Green Belt/open space at Bulls Cross and must be sought through another call for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield TLP. It is therefore untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical Importance.

4. Deliverability and Fire Safety:

The Council's assumed 8 pitches ignore site shape, access and tree constraints. Spatial analysis by the Forty Hill and Bulls Cross Study Group supports only 3–4 deliverable pitches, below the Council's own 6-pitch threshold. However, once critical BRE Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not being deliverable in compliance with BRE Fire Safety Guidance.

5. Trees, Ecology and Root Protection:

Numerous Category A & B protected trees would be lost or compromised, causing biodiversity, visual harm and adverse impact on the Priority Habit, Conservation Area, Green Belt, Metropolitan Open Land and Listed assets. The proposed development would encroach on root protection areas contrary to British Standards and best practice guidance.

6. Accessibility and Sustainability

Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The Forty Hill and Bulls Cross Study Group's swept-path analysis evidences how the turning head and entranceway are inadequate and poorly located, conflicting with highways design standards and the TLP's own layout requirements. There will be significant environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

Conclusion:
TLP_01 is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and statutory consultees before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-84.pdf

TLP19- 85 - Gemma De Vecchi

Respondent: Gemma De Vecchi

Submission Number:85

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

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2. Heritage and Conservation:
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Conclusion:
TLP_01 is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and statutory consultees before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-85(2 of 2).pdf
2. TLP19-85.pdf

TLP19- 86 - Connie Hooper

Respondent: Connie Hooper

Submission Number:86

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to you as regards the proposed site on The Ridgeway as I am very concerned. [redacted] I have visited over the years and have seen how dangerous this rd has become. Moving twelve families in with their children and dogs will be a huge mistake, the access road on to the Ridgeway is on a bend and so dangerous and some of the traffic coming off the M25 just doesn't slow down.Please give this very careful consideration kind regards

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-86.pdf

TLP19- 87 - Tiffany Pantelli

Respondent: **Tiffany Pantelli**

Submission Number:87

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please find below my formal objection to the proposed Traveller Site (Section 19) adjacent to The Ridgeway (TLP-03).

I am writing to register my objection to this proposal, as I believe the site is unsuitable for development for the following reasons:

1. Green Belt Designation

The proposed site lies within designated Green Belt land, which exists to prevent urban sprawl and preserve the openness and character of the countryside. Development in this location would conflict with the core principles of Green Belt policy and set an undesirable precedent for further encroachment.

It is understood that other similar sites have been deemed unsuitable and rejected for the same reasons as The Ridgeway site

2. Highways and Road Safety Concerns

The Ridgeway is a fast and busy stretch of road with limited visibility and no dedicated provision for safe access. The proposed entrance would be particularly dangerous given the speed of passing traffic and the lack of a safe turning area. Increased vehicle movements, including larger vehicles, would significantly heighten the risk of accidents.

3. Inadequate Infrastructure and Utilities

The area currently lacks essential utilities and services. There is no mains gas or sewerage system, water pressure is low, and both electricity and broadband provision are limited. These deficiencies make the site unsuitable for sustainable residential use.

4. Limited Access to Amenities and Services

The proposed site is not within convenient proximity to local amenities such as shops, healthcare facilities, or schools. Public transport links are poor, with only an irregular bus service operating along The Ridgeway. Furthermore, the site does not fall within a defined school catchment area, making access to education for children living on the site highly impractical.

5. Disproportionate Scale and Impact on Local Community

The immediate area comprises only a small number of existing dwellings. The introduction of twelve traveller pitches represents a disproportionate increase in population density and would alter the existing rural character of the locality, placing additional strain on limited local resources.

6. Environmental and Site Conditions

The land is low-lying and often waterlogged, rendering it physically unsuitable for long-term residential use. Development would also result in the loss of wildlife habitat, increased light and noise pollution, and the degradation of the area's natural environment.
For the reasons outlined above, I respectfully request that the proposed allocation of land under TLP-03 be reconsidered and that this site be excluded from the Traveller Site Allocations Plan.

Thank you for taking the time to consider my comments.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-87.pdf

TLP19- 88 - Gail Forrester

Respondent: Gail Forrester

Submission Number:88

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to voice my objections to Greenbelt Land being used for a Traveller site. I believe that other sites have already been discarded as they are unsuitable, for the very same issues being raised for this site on The Ridgeway.

The Ridgeway is a fast, busy road leading off the M25, where the bus stops are used by the local school children and the increased traffic would make this part of the road even more dangerous.

The proposed site for 12 Traveller families would impact on the local community of only 5 houses.

There is a lack of utilities, low water pressure, and it is a boggy field.

There will be a loss of wildlife and an increase in noise and light pollution.

For all the above reasons I object to this site being used as a Travellers Site.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-88.pdf

TLP19- 89 - Jill Simpson

Respondent: Jill Simpson

Submission Number:89

Submission Date:05/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Consultation for the Independent Inspector via Enfield Council – Enfield's Proposed Submission Traveller Local Plan (Regulation 19)

I believe that both the Land Adjacent to the Ridgeway and the Bulls Cross Nursery sites are inappropriate development in the Green Belt and do not meet the minimum requirements for amenities for travellers and do not provide a environments that will support medium to long term cohesive communities.

I fully understand that Enfield ouncil has to fulfil requirements to provide permanent and transit locations for Gypsies and travellers and their families but this location seems inappropriate on so many levels.

GREEN BELT

Policy G2 London's Green Belt Point 8.1.3

... **LBE Traveller Local Plan Draft Plan (Reg 18) 2024** Policy G2 London's Green Belt Point 8.1.3

A "The Green Belt should be protected from inappropriate development."

B "Exceptional Circumstances are required to justify either the extension or de-designation of the Green Belt …"

Here are my concerns regarding this site not meeting Exceptional Circumstance in the green belt.

The council has stated that as the site is small it will have minimal impact on the Green Belt land that surrounds it. I disagree. Should the development of this small site go ahead, it opens up this green belt land in this treasured conservation area for more development, denegrang the Conservation Area and our Heritage. Wouldn't the borough be poorer for it in many ways?.

The fundamental aim of Green Belt Policy is to prevent urban sprawl but this development if allowed may open up the whole area for more development which will be such a shame.

Amenities… to fulfil the travellers needs surely there should be a bus service and shops. There are none. The pavement, where it exists, is narrow and could be considered a risk for small children. Bulls Cross road itself, although a 30mph changing to 20mph limit is currently being assessed for speeding by local police. The proposed access to this site is potentially dangerous as it is the centre of a straight run. Has their opinion been sought?

Biodiversity
In my view this proposed site with its human population and activities would destroy an important part of a wildlife green corridor, bordering as it does with the New River, Metropolitan open space and large gardens and sports pitches. Many species have been identified and bats have been observed. Has a full bat survey been conducted?

Conservation and Heritage
Surely this should have been considered as more important? Not discounted so lightly?

.. Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979, to safeguard designated sites such as listed buildings and conservation areas

The proposed Travellers site is 50 metres only from the entrance to Grade 11 listed Myddleton House and gardens and only a quarter of a mile from Grad 1 listed Forty Hall, Gardens and Country Park. Not long ago listed as the borough's flagship heritage property. i.e. a major heritage asset.

Should Enfield Council disregard their own protections in their Conservation Management Plan?
.. " Conservation Areas are areas of special architectural and historic interest. The character and appearance of which it is desirable to preserver or enhance." See also Enfield's Conservation Area Character Appraisal. Within this it states that the individuality of the **three hamlets of |Forty Hill, Maidens Bridge and Bulls Cross** should be protected. Should this proposed small permanent site go ahead, nov only will it need to be de-designated outside the Greenbelt . Thus breaking up the Conservation area as well. it has existed for hundreds of years.

The council, subject to planning permission would need to allow construction of the required community building and 81to 0 hard standings for homes and caravan parking where no building has been allowed over many years to protect the area.

Consultation process to Enfield Residents?

I can only speak for my experience and of those of Enfield residents that I have discussed this with over the past year or so.

I first heard of this proposal by Enfield Council in the Autumn of 2023 Regulation 18. [redacted] Notby letter or any direct or indirect contact by the \council or through local papers. **But my neighbour whose friend works for the council told her and she messaged me. None of the residents in Maidens Bridge or Bulls Cross or leaders in the community e.g. the local vicar, head of Forty Hill Primary School, St Ignatius |School, residents groups, Myddelton \House Gardens or even Enfield Council's management at Forty Hall were informed before the Regulation 18 consultation or afterwards. Not a great consultation proceess.**

I verbally and via email spread the word as much as I could back then.

I attended a Drop-In meeting at St Michael's School. Where I obtained a document which listed the various sites that had and still were being considered. Some had been discounted because of Conservation Area status. But no record of Bulls Cross Nursery proposed site being in a Conservation Area. The two consultants present were surprised when I and another resident confirmed that it was and also they admitted that they had not visited the site either. I attended the Regulation 19 drop in too and not much had changed.

I tried to find Enfield's Scheme of Delegation on the Council's website too be able to assess if processes particularly within the consultation had been followed. I thought it would be within the Constitution, but it seems not. My ward councillor did not succeed in finding it for me either.

When I have asked about how residents are being informed. I am told that in the main its Via social media. This is very vague and even if we look at Enfield Council Posts on Facebook for example, it is impossible to monitor these all the time to see them before they are superseded by more current posts. This is not satisfactory; it actually does not work as a method of consultation.

If you do not know something is happening in your area how do you know to look for it? I found the on-line form too complex. I do hope that it hasn't discouraged residents from commenting.

Meeting Friday 5th September 2025
Although I was pleased to be invited to this meeting which had three/four council officers and two consultants present, as it was such an important presentation the up-and-coming process of the TLP, I wondered why only a few people attended, the response was.

From [redacted] "Friday's briefing was a small, invitation-only session requested by the Leader. We invited people and organisations who had contacted the Council or the Leader directly about the Traveller Local Plan outside the formal engagement periods. It was not a formal consultation. The formal Regulation 19 consultation will run later this year and will be open to all.

Not all those who had attended the previous round of Drop Ins were invited and the only reason that representatives from the Forty Hill and Bulls Cross study group arrived was that I had emailed them. At the late afternoon presentation, I was the only public attendee. Why? Everyone was very helpful but at the end of the presentation I was surprised to be asked to spread the word to the rest of the community. ***Why was this my responsibility?***

Consultation with Gypsies and Travellers - Have these communities been consulted to check if the current proposed 3 sites are acceptable to them? Would they prefer provision of council houses to cramped small sites like these? AS so much housing is planned with |Enfield, has this been carefully researched and considered? Maybe a delay for something more ap[ropraote would be beneficial?

Do the Travelling Community accept that these two permanent sites are delivering appropriate, safe accommodation? I understand that a recent assessment completed regarding fire risk confirms that it is not. Are the Travelling Community aware of this?

Rural Exception Sites Policy – I do not understand this, but it was discounted within the Reg 18 2024 document. Is it relevant?

Social cohesion

Isn't it important for the travellers and the existing residents to form a community? How can this be achieved and what research has been completed into social cohesion? For example, the site is at the bottom of the gardens of all residents in Turkey Street. One of which is occupied by Marcus and Marcus a sheltered home, who provide individual packages of support to enable people affected by Autism or a Learning Difficulty to live an ordinary life in their community. These things just worry me, as this has to work for everyone. Have Marcus and Marcus been informed?

The only written letters received as hard copies locally have been delivered by our Ward Councillors not the council.

With regard to the Travellers Local Plan Regulations 18 & 19, **Has Enfield complied with requirements set out in the Planning and Compulsory Purchase Act 2004?**

Seeking alternative Sites

Although the appointed consultants advised us verbally that they had put out two calls for sites. In response to questions, we discovered that proposed sites came in through Property Services. Only council owned sites in the green belt or on |Metropolitan Open Land or Open Space were considered. No serious consideration of privately owned brownfield sites or potential sites using compulsory purchase were considered. Except for the open land called the Dell, on the A10, which was later withdrawn by the owner (Haringey Council?) This seems larger are more suitable in general, cannot negotiations be re-opened?

I know Enfield have left this late for whatever reason but surely providing the right permanent homes for the Travellers that they will appreciate is more important than deadlines?

I believe this process has been poorly executed, perhaps heavily weighted in favour of retaining land for perceived future value and lets down the people of Enfield and the travellers down.

Planning and Green Belt De-designation? Real Concerns

With regards to Enfield Council's response to queries, that the Bulls Cross site would be subject to planning permission anyway, would it not be circumspect to establish the appropriateness of the site as judged by the travelling community and biodiversity experts before de-designation of the site in the Green Belt?

My fear is that if the de-designation takes place and the travellers refuse the site it will then be open to alternative development thus devaluing the Conservation area and its important to Heritage assets as mentioned elsewhere and not for the right reason.

I hope the Inspector should he agree with my comments and concerns and will find the plan for Bulls Cross Nursery site unsound and non-compliant and would harm the heritage assets and not meet exceptional circumstances for de-designating it from Green Belt.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)

* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I am emailing this s the Plan Making Team have said that an email will be acceptable, I have found the on-line document too complex for me.
Please acknowledge receipt of my comments and that they will be taken fully into account as in the attachment.
I hope the Inspector, should he agree with my comments and concerns,will find the plan for Bulls Cross Nursery site
unsound and non-compliant and would harm the heritage assets and not meet exceptional circumstances for de-designating it from Green Belt.
There are many more comments from others more experienced in the words of offialdom. I do hope that my laypersons approach is acceptable.
Having been involved in local groups, [redacted] in this beautiful Conservation area, I would greatly appreciate the chance to speak at the Inspector's hearing.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-89(1 of 2).pdf
2. TLP19-89(2 of 2).pdf

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

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Consultation for the Independent Inspector via Enfield Council
– Enfield's Proposed Submission Traveller Local Plan (Regulation 19)

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GREEN BELT

Policy G2 London's Green Belt Point 8.1.3

... **LBE Traveller Local Plan Draft Plan (Reg 18) 2024** Policy G2 London's Green Belt Point 8.1.3

A "The Green Belt should be protected from inappropriate development."

B "Exceptional Circumstances are required to justify either the extension or de-designation of the Green Belt …"

Here are my concerns regarding this site not meeting Exceptional Circumstance in the green belt.

The council has stated that as the site is small it will have minimal impact on the Green Belt land that surrounds it. I disagree. Should the development of this small site go ahead, it opens up this green belt land in this treasured conservation area for more development, denegrang the Conservation Area and our Heritage. Wouldn't the borough be poorer for it in many ways?.

The fundamental aim of Green Belt Policy is to prevent urban sprawl but this development if allowed may open up the whole area for more development which will be such a shame.

Amenities… to fulfil the travellers needs surely there should be a bus service and shops. There are none. The pavement, where it exists, is narrow and could be considered a risk for small children. Bulls Cross road itself, although a 30mph changing to 20mph limit is currently being assessed for speeding by local police. The proposed access to this site is potentially dangerous as it is the centre of a straight run. Has their opinion been sought?

Biodiversity
In my view this proposed site with its human population and activities would destroy an important part of a wildlife green corridor, bordering as it does with the New River, Metropolitan open space and large gardens and sports pitches. Many species have been identified and bats have been observed. Has a full bat survey been conducted?

Conservation and Heritage
Surely this should have been considered as more important? Not discounted so lightly?

.. Planning (Listed Buildings and Conservation Areas) Act 1990 and the Ancient Monuments and Archaeological Areas Act 1979, to safeguard designated sites such as listed buildings and conservation areas

The proposed Travellers site is 50 metres only from the entrance to Grade 11 listed Myddleton House and gardens and only a quarter of a mile from Grad 1 listed Forty Hall, Gardens and Country Park. Not long ago listed as the borough's flagship heritage property. i.e. a major heritage asset.

Should Enfield Council disregard their own protections in their Conservation Management Plan?
.. " Conservation Areas are areas of special architectural and historic interest. The character and appearance of which it is desirable to preserver or enhance." See also Enfield's Conservation Area Character Appraisal. Within this it states that the individuality of the **three hamlets of |Forty Hill, Maidens Bridge and Bulls Cross** should be protected. Should this proposed small permanent site go ahead, nov only will it need to be de-designated outside the Greenbelt . Thus breaking up the Conservation area as well. it has existed for hundreds of years.

The council, subject to planning permission would need to allow construction of the required community building and 81to 0 hard standings for homes and caravan parking where no building has been allowed over many years to protect the area.

Consultation process to Enfield Residents?

I can only speak for my experience and of those of Enfield residents that I have discussed this with over the past year or so.

I first heard of this proposal by Enfield Council in the Autumn of 2023 Regulation 18. [redacted] Notby letter or any direct or indirect contact by the \council or through local papers. **But my neighbour whose friend works for the council told her and she messaged me. None of the residents in Maidens Bridge or Bulls Cross or leaders in the community e.g. the local vicar, head of Forty Hill Primary School, St Ignatius |School, residents groups, Myddelton \House Gardens or even Enfield Council's management at Forty Hall were informed before the Regulation 18 consultation or afterwards. Not a great consultation proceess.**

I verbally and via email spread the word as much as I could back then.

I attended a Drop-In meeting at St Michael's School. Where I obtained a document which listed the various sites that had and still were being considered. Some had been discounted because of Conservation Area status. But no record of Bulls Cross Nursery proposed site being in a Conservation Area. The two consultants present were surprised when I and another resident confirmed that it was and also they admitted that they had not visited the site either. I attended the Regulation 19 drop in too and not much had changed.

I tried to find Enfield's Scheme of Delegation on the Council's website too be able to assess if processes particularly within the consultation had been followed. I thought it would be within the Constitution, but it seems not. My ward councillor did not succeed in finding it for me either.

When I have asked about how residents are being informed. I am told that in the main its Via social media. This is very vague and even if we look at Enfield Council Posts on Facebook for example, it is impossible to monitor these all the time to see them before they are superseded by more current posts. This is not satisfactory; it actually does not work as a method of consultation.

If you do not know something is happening in your area how do you know to look for it? I found the on-line form too complex. I do hope that it hasn't discouraged residents from commenting.

Meeting Friday 5th September 2025
Although I was pleased to be invited to this meeting which had three/four council officers and two consultants present, as it was such an important presentation the up-and-coming process of the TLP, I wondered why only a few people attended, the response was.

From [redacted] "Friday's briefing was a small, invitation-only session requested by the Leader. We invited people and organisations who had contacted the Council or the Leader directly about the Traveller Local Plan outside the formal engagement periods. It was not a formal consultation. The formal Regulation 19 consultation will run later this year and will be open to all.

Not all those who had attended the previous round of Drop Ins were invited and the only reason that representatives from the Forty Hill and Bulls Cross study group arrived was that I had emailed them. At the late afternoon presentation, I was the only public attendee. Why? Everyone was very helpful but at the end of the presentation I was surprised to be asked to spread the word to the rest of the community. ***Why was this my responsibility?***

Consultation with Gypsies and Travellers - Have these communities been consulted to check if the current proposed 3 sites are acceptable to them? Would they prefer provision of council houses to cramped small sites like these? AS so much housing is planned with |Enfield, has this been carefully researched and considered? Maybe a delay for something more ap[ropraote would be beneficial?

Do the Travelling Community accept that these two permanent sites are delivering appropriate, safe accommodation? I understand that a recent assessment completed regarding fire risk confirms that it is not. Are the Travelling Community aware of this?

Rural Exception Sites Policy – I do not understand this, but it was discounted within the Reg 18 2024 document. Is it relevant?

Social cohesion

Isn't it important for the travellers and the existing residents to form a community? How can this be achieved and what research has been completed into social cohesion? For example, the site is at the bottom of the gardens of all residents in Turkey Street. One of which is occupied by Marcus and Marcus a sheltered home, who provide individual packages of support to enable people affected by Autism or a Learning Difficulty to live an ordinary life in their community. These things just worry me, as this has to work for everyone. Have Marcus and Marcus been informed?

The only written letters received as hard copies locally have been delivered by our Ward Councillors not the council.

With regard to the Travellers Local Plan Regulations 18 & 19, **Has Enfield complied with requirements set out in the Planning and Compulsory Purchase Act 2004?**

Seeking alternative Sites

Although the appointed consultants advised us verbally that they had put out two calls for sites. In response to questions, we discovered that proposed sites came in through Property Services. Only council owned sites in the green belt or on |Metropolitan Open Land or Open Space were considered. No serious consideration of privately owned brownfield sites or potential sites using compulsory purchase were considered. Except for the open land called the Dell, on the A10, which was later withdrawn by the owner (Haringey Council?) This seems larger are more suitable in general, cannot negotiations be re-opened?

I know Enfield have left this late for whatever reason but surely providing the right permanent homes for the Travellers that they will appreciate is more important than deadlines?

I believe this process has been poorly executed, perhaps heavily weighted in favour of retaining land for perceived future value and lets down the people of Enfield and the travellers down.

Planning and Green Belt De-designation? Real Concerns

With regards to Enfield Council's response to queries, that the Bulls Cross site would be subject to planning permission anyway, would it not be circumspect to establish the appropriateness of the site as judged by the travelling community and biodiversity experts before de-designation of the site in the Green Belt?

My fear is that if the de-designation takes place and the travellers refuse the site it will then be open to alternative development thus devaluing the Conservation area and its important to Heritage assets as mentioned elsewhere and not for the right reason.

I hope the Inspector should he agree with my comments and concerns and will find the plan for Bulls Cross Nursery site unsound and non-compliant and would harm the heritage assets and not meet exceptional circumstances for de-designating it from Green Belt.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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There are many more comments from others more experienced in the words of offialdom. I do hope that my laypersons approach is acceptable.
Having been involved in local groups, [redacted] in this beautiful Conservation area, I would greatly appreciate the chance to speak at the Inspector's hearing.

Land adjacent to Ridgeway (Site 2)

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Consultation for the Independent Inspector via Enfield Council
– Enfield's Proposed Submission Traveller Local Plan (Regulation 19)

I believe that both the Land Adjacent to the Ridgeway and the Bulls Cross Nursery sites are inappropriate development in the Green Belt and do not meet the minimum requirements for amenities for travellers and do not provide a environments that will support medium to long term cohesive communities.

I fully understand that Enfield ouncil has to fulfil requirements to provide permanent and transit locations for Gypsies and travellers and their families but this location seems inappropriate on so many levels.

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**Having been involved in local groups, [redacted] in this
beautiful Conservation area, I would greatly appreciate the chance to speak at the Inspector's hearing.**

TLP19- 90 - S Cambaz

Respondent: S Cambaz

Submission Number:90

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

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Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

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I am writing to formally object to the proposed traveller site on The Ridgeway part of Enfield Council's Section 19 consultation. Although I do not live immediately adjacent to the proposed location, I am a resident of Enfield and wish to raise several planning-based concerns regarding the suitability of this site.

Firstly, the proposed development lies within designated Green Belt land. National and local planning policy emphasises the importance of safeguarding the Green Belt from inappropriate development. The introduction of a residential site in this location would undermine the open and rural character of the area and would conflict with the established purposes of Green Belt protection.

Secondly, the site's physical characteristics make it unsuitable for development of this nature. The land is known to be boggy and poorly drained, lying adjacent to a fast and busy section of The Ridgeway. This raises legitimate concerns about safety and access, particularly given the limited visibility and high traffic speeds in that area.

The highway implications of this proposal also warrant serious consideration. The Ridgeway already carries significant traffic, and additional vehicle movements associated with the site would increase the risk of accidents. Safe ingress and egress to the site would be difficult to achieve without compromising road safety.

There are also clear infrastructure deficiencies in this location. There is no mains gas or sewer connection, water pressure is low, and the local electricity supply is limited. These shortcomings make the site unsustainable and ill-equipped to support multiple new residential pitches. In addition, development of the site would lead to loss of open landscape and potential harm to local wildlife. The area forms part of an important environmental corridor, and further development would diminish its ecological value through habitat disturbance, noise, and light pollution. While I fully recognise the need to make appropriate provision for traveller accommodation within the borough, this particular site does not meet the planning requirements for a sustainable, safe, and environmentally suitable location.

For these reasons, I respectfully request that this proposal be reconsidered and that alternative, more appropriate sites are identified in accordance with planning and environmental policies.

Thank you for considering my comments as part of this consultation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-90.pdf

TLP19- 91 - Sandra Sinclair

Respondent: Sandra Sinclair

Submission Number:91

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I do not consider that the travellers local plan is sound because I do not agree with the conclusion regarding the suitability of site TLP Land A10 skate park N9 9HW for a transit site.

In my view the conclusion is flawed, for the following reasons (1) [redacted] (2) [redacted]. (3) It is adjoining the A10 and access to this site is off this road. It is already very congested and this proposal will only make things worse, [redacted]

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please reconsider the conclusions for the site TLP for the reasons given above it should be discounted.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-91.pdf

TLP19- 92 - Peter Sinclair

Respondent: Peter Sinclair

Submission Number:92

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

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A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

a10 site

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

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Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

4. legal compliance: No

The Plan does not appear to meet the requirements for meaningful engagement under the Town and Country Planning (Local Planning)(England) Regulations 2012. In particular, there is no clear evidence that Enfield Council consulted or involved affected local youth organisations or community users of the existing Skatepark facility. This omission undermines the transparency and inclusivity of the plan-making process and raises concerns about legal compliance with the Council's Statement of Community Involvement.

4. Duty to co-operate: No

The Plan does not clearly demonstrate effective co-operation with neighbouring authorities or relevant bodies (for example, other North London boroughs or the GLA) in identifying appropriate alternative sites for Traveller accommodation. As a result, potentially more suitable locations beyond Enfield's community recreation land may not have been properly explored, contrary to Section 33A of the Planning and Compulsory Purchase Act 2004 (the duty to co-operate).

I object to the proposed allocation of the A10 site (adjacent to the Edmonton Skatepark and Cemetery) as a Traveller traisit site.

This part of the Plan is not justified because the Council has not provided proportionate evidence or assessed reasonable alternatives. The site is already in use as a valued community Skatepark and youth recreation area. The social and health benefits of this existing use have not been properly weighed against the proposed allocation.

It is not effective because the site is unlikely to be deliverable It lacks safe access, essential infrastructure and services, and would require the loss of an established leisure facility, which is likely to face sustained public opposition and practical delivery barriers.

It is not consistent with national policy because the proposal conflicts with:

-NPPF (para 99) - which protects existing open space and recreational land unless equivalent or better provision is made;

-NPPF (para 130 and 185) - which require developments to create safe, healthy, and inclusive environments; and

- London Plan Policy S5 - which safeguards community, leisure and play facilities.

The A10 site's proximity to a busy dual carriageway also raises air-quality and safety concerns (eg access for Emergency service vehicles coming from Edmonton Green via Church Street) contrary to these policies.

For these reasons the A10 allocation fails the "justified", "effective", and "consistent with national policy" tests of soundness in paragraph 35 of the NPPF.

Remove the A10 Skatepark site from the list of allocations.

If further Traveller capacity is required, identify and assess alternative locations that do not result in the loss of existing community or youth recreation facilities, in consultation with affected user groups.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-92.pdf

TLP19- 93 - Sheila Childs

Respondent: Sheila Childs

Submission Number:93

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

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  A specific policy in the Traveller Local Plan
  A paragraph or set of paragraphs in the Traveller Local Plan
  Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

a10

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	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		✓

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I object to the proposed allocation of the A10 site adjacent Edmonton skate park and cemetary as a traveller transit site.

Plan is not justified no alternatives as yet - site is used as a valued community skatepark and recreation area, social and health benefits of this existing use - not been properly weighed against the proposed allocation. It lacks safe access and the infrastructure and services and would will require the loss of an established leisure facility - it will face public opposition conflicts with NPPF (para 99)

This plan is said to be based on a very busy A10 road which I don't think is a safe environment - local school children waiting for bus very near there and large vehicles - thats why I think it should be placed in a more rural area.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-93.pdf

TLP19- 94 - Sylvia Meehan

Respondent: Sylvia Meehan

Submission Number:94

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

It is a dangerous site right at the traffic lights on the very busy A10. [redacted] present used for Skateboarding is well used especially as there are few places for older children to excise without payment. This is good, For not only physical health bus also their mental health. Although its said it will be relocated. If this is so, it should be made before the existing one is demolished because where will they be able to go in the meantime? It is also possible the council will say they don't have to money to do so. Also it wasn't long ago a lot of money was spent on the skatepark to improve it. [redacted]

People visiting their loveones graves will be [redacted]

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		
Start of the examination		
Schedule of Main modifications stage (following hearings)		
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-94.pdf

TLP19- 96 - Mervyn Stokes-Geddes

Respondent: Mervyn Stokes-Geddes

Submission Number:96

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Site adjacent to Ridgeway

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I have the following concerns over the proposed Travellers Site adjacent to the Ridgeway:-
1. Further loss of Green Belt
2. Lack of utilities on the site including Gas, Electricity, Water and Sewage
3. Impact on the local community
4. Increased traffic, with poor access onto the Ridgeway on a bend, and the likelihood of a serious accident
5. Lack of local amenities ie Shops, Schools, and GP Surgery
6. Impact on wildlife

Thank you in anticipation that my concerns WILL be taken into account, during the decision making process.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-96.pdf

TLP19- 97 - Becky Jenkins

Respondent: Becky Jenkins

Submission Number:97

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to raise my concerns re impact of families being homed on this green belt land, impacting wildlife habitat already being diminished countrywide.With greenbelt and the natural environment being under pressure from many outside influences, I ask that this land be preserved . Surely brown sight areas would serve better?

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-97.pdf

TLP19- 98 - Joanna Mason

Respondent: Joanna Mason

Submission Number:98

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The loss, yet again of more green belt in the UK (desperately needed in the UK as cities, particularly London get bigger and more polluted as a result.

2. The increase in traffic and pollutants in this area (in the last couple of years there has been a massive amount of housing development following the sale of the Chase Farm Hospital site. Most of the site has been developed as housing and a large secondary school increasing hugely the number of cars in the area and on the Ridgeway.

3. The lack of services available to the travellers in this area (it is my understanding that this site is not their own preferred option for a permanent site)by simply providing a plot of land in the middle of nowhere is this likely to cause yet more issues for travelling families rather than meet their needs which presumably this provision is meant to do.

Increasing yet again the traffic pressures on this area of Enfield (Chase Farm Development) will in my view put too much additional stress on this area and ultimately not help the families you are attempting to assist.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-98.pdf

TLP19- 99 - Jo Symonds

Respondent: Jo Symonds

Submission Number:99

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

All sites

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the London Borough of Enfield’s proposal to establish permanent traveller sites at Bulls Cross, A10 Church Street, and The Ridgeway.

[redacted]

I seek clarification regarding site management and enforcement. Specifically, how will you ensure that designated sites are utilised appropriately? Will rental fees be imposed and monitored, and will swift action be taken should any issues arise? Additionally, residents living near proposed locations
remain concerned about noise, disruption, increased traffic, and adherence to site regulations.

While I understand there is a clear need for designated spaces, the effectiveness of this approach depends on robust oversight and compliance measures. I look forward to your response addressing these points.

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

All sites

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the London Borough of Enfield’s proposal to establish permanent traveller sites at Bulls Cross, A10 Church Street, and

[redacted]

I seek clarification regarding site management and enforcement. Specifically, how will you ensure that designated sites are utilised appropriately? Will rental fees be imposed and monitored, and will swift action be taken should any issues arise? Additionally, residents living near proposed locations
remain concerned about noise, disruption, increased traffic, and adherence to site regulations.

While I understand there is a clear need for designated spaces, the effectiveness of this approach depends on robust oversight and compliance measures. I look forward to your response addressing these points.

Land at A10 (Site 3)

Comment Number: 4

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment

A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

All sites

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing in response to the London Borough of Enfield’s proposal to establish permanent traveller sites at Bulls Cross, A10 Church Street, and The Ridgeway.

[redacted]

I seek clarification regarding site management and enforcement. Specifically, how will you ensure that designated sites are utilised appropriately? Will rental fees be imposed and monitored, and will swift action be taken should any issues arise? Additionally, residents living near proposed locations
remain concerned about noise, disruption, increased traffic, and adherence to site regulations.

While I understand there is a clear need for designated spaces, the effectiveness of this approach depends on robust oversight and compliance measures. I look forward to your response addressing these points.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-99.pdf

TLP19- 100 - Gordon Goodwin

Respondent: Gordon Goodwin

Submission Number:100

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to object to the proposed allocation TLP_01 – Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. I believe the allocation of this site is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy, my reasons for this are as follows:

1. Green Belt and Local Open Space:

The Bulls Cross site's release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Sustainability Appraisal records "significant negative" effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:

The overall plan over provides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy. There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less
constrained sites could meet the Borough's needs without causing such material harm to the Green Belt/open space at Bulls Cross and must be sought through another call for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield LP. It is therefore untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical importance.

4. Deliverability and Fire Safety:

The Council's assumed 8 pitches ignore site shape, access and tree constraints. Initial spatial analysis supports only 3–4 deliverable pitches, below the Council's own 6-pitch threshold. However, once critical BRE Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not
being deliverable in compliance with BRE Fire Safety Guidance.

5. Trees, Ecology and Root Protection:

Numerous Category A & B trees would be lost or compromised, causing damage to biodiversity, visual harm and adverse impact on the deciduous woodland priority habitat (part), Conservation Area, Green Belt, local open space and Listed assets. The proposed development would encroach on root protection areas contrary
to British Standards and best practice guidance.

6. Accessibility and Sustainability

Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The a swept-path analysis would evidence how the turning head and entranceway are inadequate and poorly located, conflicting with highways design standards and the TLP's own layout requirements. There will be significant

environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

[Insert any further comments relevant to planning policy….]

Conclusion:

TLP_01 is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and stakeholders before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-100 main.pdf
2. TLP19-100.pdf

TLP19- 101 - Chris Freeman

Respondent: Chris Freeman

Submission Number:101

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Poor location choice - [redacted]

Area is tiny, leave the park for the kids.

[redacted]

What is a transit site ?

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-101.pdf

TLP19- 102 - Anthony Peters

Respondent: Anthony Peters

Submission Number:102

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

One reason I think that a travellers site along the Ridgeway is not a good idea is because it is greenbelt land and we are losing enough of this already.

[redacted].
[redacted]

There are no utilities on the site and this would be quite a big job to supply them [redacted]

There is also the loss to wildlife which we must consider.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-102.pdf

TLP19- 103 - John James

Respondent: John James

Submission Number:103

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

My objections to the inclusion of the A10 site as a transit site are as follows:

1. The site is inadequate to meet the minimum number of 15 caravans set out in the delivery requirements (Appendix B - Site 3). The average car and caravan is between 12 to 15ft and the alck of room to manoeuvre vehicles could lead to cars and caravans tryig to reverse into the A10. Given travellers will want to park their cars on the site as well suggests at best only 5 to 6 caravans could be accommodated comfortably. Or are the Council suggesting the cars are parked in the already congested surrounding roads?

2. Maintaining the pedestrian route across the site (which is a requirement set out in the design principles) as well planting a screen to theA10 will further impact the sites capacity.

3. The exceptional need to release this Metropolitan OPen Land has not been established, when there are other sites such as Meridian water which haven't been considered?Why haven't these ore suitable sites been considered?

4. The only access to the site is from the A10 a busy dual carriageway. The site is close to the junction of another busy main road, Church Street. It is difficult to see how caravans can be manoeuvre safely into this site. Have TfL been consulted and what is their view?

5. The Council has not provided any transport modelling to show how vehicles can safetly access the site from the A10. On this ground alone inclusion of this site cannot be justified.

6. The plan doesn't consider the impact on the Cemetery and Cemetery House. a transit site will generate a lot of additional noise and pollution. This will impact burials in the cemetery and services at the Chapel of Rest. The siting of a transit site here is not sensible

7. Loss of amenity. The skatepark is a much loved and well used sports facility used by younger residents, which the Friends of the skatepark have plans and funding to develop (now on hold depending on hte local plan decision). Loss of the skatepark goes against Council policies to develop sport and play facilities. The document contains vague promise to relocate but it is unclear where and how close to the existing site. Recreating it too far away will mean existing local users will lose out.

8.There is no definition in the plan of what a 'transit site' actually is. How will Council ensure that this transit site won't become a permanent site?

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposed site on the A10 is inadequate for the purpose and should be removed from the plan. Alternative sites should be sort particularly from sites not considered such as Meridian Water.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As a local resident I want to raise amongst other things, the inadequacy of the proposed site for a transit site. It potential impact on residents and on the adjacent cemetery and on the road safety issues of the only access being via the A10.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-103 main.pdf
2. TLP19-103.pdf

TLP19- 104 - Ian Draper

Respondent: Ian Draper

Submission Number:104

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to object to the Proposed planning Request for a Travelers Site on The Ridgeway Enfield for the following important reasons.

This proposed site is on Green Belt Land.

This road is an extremely busy road with a high-speed limit and also heavy goods traffic. To Introduce probably two to three times the amount of traffic using this junction would seriously increase risk to
an already dangerous Junction

The existing Utilities are very poor. No Gas, Sewage, Drainage, very poor Electricity Supplies, and extremely low water pressure most of the time, which both would only become worse.

I don't feel this Site has the local facilities that 12 additional families would require, also it is extremely close to a very noisy road for a Caravan Environment.

The Proposed Site is a very muddy field and very swampy in bad weather and would be very expensive to make suitable for Vehicles / Caravans.

I feel that there would be an important loss to the local Environment and Wildlife.

There is also many Local School Children use this Bus Stop, and the increased traffic would seriously endanger their Safety while wating for Busses.

I have noticed that many other similar sites have been decarded or are unsuitable for many of the very same issues that I have stated.

I therefore feel that this proposed site should also be rejected.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-104.pdf

TLP19- 105 - Lesley Peters

Respondent: Lesley Peters

Submission Number:105

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would be most grateful to have the following objections considered when the Section 19 consultation is put before
the Independent Inspector.

The proposed site is not really suitable for a number of reasons:

- the proposed field has a tendency to become rather boggy
- There is a lack of suitable utilities, like gas, sewers, low water pressure and weak
- The traffic on this stretch of road is very busy and has a dangerous entrance and turning places. There is also a bus stop used by many school children whose safety is so important.
- There will be a great impact on the local community as there are only 5 houses a ected but proposed12 travellers families which is greatly disproportionate
- There is going to be a great loss of wildlife.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-105.pdf

TLP19- 106 - Chris Ferrary

Respondent: Chris FerraryFriends of Fir Farm

Submission Number:106

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

FOFF’s basis for objection to this proposal are:

• The proposed Transit Site is near the vulnerable ecosystems of Firs Farm Wetlands. We believe that the proposal is likely to have an adverse impact on this fragile environment, and potentially will cause irreparable damage to this important local resource.
• The proposal will adversely affect existing commercial activities at Firs Farm and the surrounding areas and may lead to a reduction in the facilities and amenities available to the local community.
• The site is designated as Metropolitan Open Land (MOL), and this proposed use is contrary to the policies set out in the London Plan and the New Enfield Local Plan.
• 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.
• The access to the proposed site is unsafe because of its location on the Great Cambridge Road (A10) and its proximity to the nearby signalled junction and bus stop.

FOFF previously made similar objections in responding to the Regulation 18(2) consultation held by Enfield Council in October/November 2024. We have reviewed the revised draft plan and associated evidence issued by the Council as part of the current consultation and consider that the responses to these objections are inadequate and do not meet FOFF concerns in any way.

These objections are set out in more detail and with additional justification in the separate document forwarded with this form to travellerlocalplan@enfield.gov.uk.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Enfield Council needs to identify and include in the plan a proposed Transit site that not only meets the Council's own selection criteria, but also complies with other national and local policies on the protection of open land and environmental protection. The Plan currently being consulted on does not to this as evidenced above

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Council has responded inadequately and incorrectly to the objections raised to the use of the site on the A10 as a Transit Site at earlier stages of consultation on the Traveller Plan. The Charity therefore believes that it is important that it has the opportunity to make these objections directly to the independent inspector to be appointed. We have no confidence that these points will be adequately and properly considered otherwise.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-106 (2 of 3).pdf
2. TLP19-106 (3 of 3).pdf
3. TLP19-106 (1 of 3).pdf

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective

* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

FOFF's basis for objection to this proposal are:

• The proposed Transit Site is near the vulnerable ecosystems of Firs Farm Wetlands. We believe that the proposal is likely to have an adverse impact on this fragile environment, and potentially will cause irreparable damage to this important local resource.
• The proposal will adversely affect existing commercial activities at Firs Farm and the surrounding areas and may lead to a reduction in the facilities and amenities available to the local community.
• The site is designated as Metropolitan Open Land (MOL), and this proposed use is contrary to the policies set out in the London Plan and the New Enfield Local Plan.
• 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.
• The access to the proposed site is unsafe because of its location on the Great Cambridge Road (A10) and its proximity to the nearby signalled junction and bus stop.

FOFF previously made similar objections in responding to the Regulation 18(2) consultation held by Enfield Council in October/November 2024. We have reviewed the revised draft plan and associated evidence issued by the Council as part of the current consultation and consider that the responses to these objections are inadequate and do not meet FOFF concerns in any way.

These objections are set out in more detail and with additional justification in the separate document forwarded with this form to travellerlocalplan@enfield.gov.uk.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Enfield Council needs to identify and include in the plan a proposed Transit site that not only meets the Council's own selection criteria, but also complies with other national and local policies on the protection of open land and environmental protection. The Plan currently being consulted on does not to this as evidenced above

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Council has responded inadequately and incorrectly to the objections raised to the use of the site on the A10 as a Transit Site at earlier stages of consultation on the Traveller Plan. The Charity therefore believes that it is important that it has the opportunity to make these objections directly to the independent inspector to be appointed. We have no confidence that these points will be adequately and properly considered otherwise.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 107 - Padraig Brady

Respondent: Padraig Brady

Submission Number:107

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I oppose the proposal on the following basis:
1 Green Belt space concerns
2 Heritage and conservation failings
3 concerns over the plan making process
4 capacity concerns
5 threat to ecology protection
6 my view that the proposed site is substantially unsuitable

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-107.pdf

TLP19- 108 - Donna Peters

Respondent: Donna Peters

Submission Number:108

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I feel very strongly against the proposed traveller site along the Ridgeway as this is Greenbelt land and the environment should be protected as well as the wildlife.

I know the area very well and I feel that the Ridgeway is already an accident black spot and it is a very fast road making it dangerous to pull out of that turning, an increase of traffic would only make this road worse.

I also feel that proposing 12 traveller dwellings at this site is disproportionate number considering there are only five
houses there at the moment.

There are no amenities in place in the field and it would cost the council a very large amount of money to put the infrastructure in place for the new dwellings.

Other sites have been rejected on the same grounds as stated above.

I urge you to dismiss The Ridgeway in favour or finding a more suitable site.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-108.pdf

TLP19- 109 - Carol Fisk

Respondent: Carol FiskEnfield Roadwatch Action Group

Submission Number:109

Submission Date:05/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 6

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Introduction
Enfield RoadWatch welcomes the opportunity to comment on the Regulation 19 Draft Traveller Local Plan (TLP) (2020-2041). We also participated fully at the Regulation 18 stage.

2. General Conformity with the London Plan

We do not believe the TLP to be in general conformity with the London Plan 2021 (LP21), as is required. The Council has failed to take key LP21 policies into account: H14 (Gypsy and Traveller accommodation), G2 (Green Belt), G3 (Metropolitan Open Land), and broader strategic policies on connectivity, inclusivity, and spatial sustainability, such as H1, and T1–T4. In particular:

a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects new sites to be "well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood". The sites at Bulls Cross, The Ridgeway, and A10 (Transit site) are all, by contrast, situated at the edge of the built-up area in low PTAL Green Belt or MOL locations, which are remote from shops and services.

b.Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP Policies G2B and G3-C state: G2-B Exceptional circumstances are
required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. G3-C MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Exceptional circumstances must exist for boundary changes to Green Belt or MOL to be made and those circumstances can be justified only where no suitable brownfield or urban sites exist. We do not believe that all potential brownfield sites were adequately assessed, especially new sites suggested at the Regulation 18 stage. Therefore the threshold for exceptional circumstances has not been met.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

3. Specific site issues

Bulls Cross Nursery (Site 1)

In addition to our comments made at Regulation 18 about the impact on the Conservation Area, we also note that:

LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation) both require the use of a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities.

The Bulls Cross Nursery site was assessed in the HELAA 2023 as a potentially developable housing site for 79 homes but was subsequently rejected because of concerns about accessibility and isolation. Its inclusion in the TLP goes against the Council's Site Selection Topic Paper 3.20 which states: The sites within the HELAA that were rejected for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be suitable for meeting Traveller accommodation needs.

The Bulls Cross Nursery site is therefore not in general conformity with LP21 Policy H14.

Land Adjacent to Ridgeway (Site 2)

Our comments above and at Regulation 18 about the lack of evidence for exceptional circumstances, the impact on the Area of Special Character
[DMD84], traffic issues along The Ridgeway and the fact that this site is not in a sustainable location remain valid.

In addition, we would note that this site lies within the area of PL9 Rural Enfield as evidenced by Figure 3.10 in the Rural Enfield Placemaking Vision. In contradiction, page 12 of the TLP Site Selection Topic Paper states that the area of PL9 Rural Enfield is not a 'reasonable alternative' for a Traveller site because it: 'encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.' This site is not identified in Policy P9 for anything other than landscape restoration.

Land at A10 / Edmonton Skate Park (Site 3)

In addition to our comments at Regulation 18 about the impact on traffic on the A10 and the Skate Park itself, we would note:

Paragraph 5.20 of the Site Selection Topic Paper (September 2025) amends the allocation to include part of the skate park itself, necessitating the relocation of this popular facility. [New location unknown] Without an updated Playing Pitch Strategy, there is no evidence that this facility is surplus to requirements. The proposal therefore conflicts with LP21 Policy S5 Sports and Recreation
Facilities 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and subregional level. Needs assessments should include an audit of existing facilities, and Policy G4 (Open Space).

Therefore a decision about the allocation of Site 3 should be delayed until the appropriate evidence is available. Until then, the allocation fails the tests of soundness under NPPF 35.

Other sites

It appears unreasonable that Crews Hill PL11 and Chase Park PL10, two potential placemaking areas, have been included and not Meridian Water PL5. TLP 4.22 states that possible pitch provision at PL10 and PL11 will be identified only during the masterplanning process. That will involve the cooperation of multiple landowners, who may not be agreeable to pitch provision near their developments. Additionally, neither of the placemaking areas is currently in general conformity with the London Plan 2021.

By contrast, Meridian Water PL5, which is more sustainable and under Council control, is dismissed because no suitable residual land is available. Given that the long-term aspiration is for 10,000 homes at Meridian Water but only approximately 6,700 are expected to be built in the plan period up to 2041, it is disingenuous to claim that no land for pitch provision can be identified in this publicly-led regeneration project of strategic importance. This weakens the Council's "exceptional circumstances" case for Green Belt release.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to the accompanying document in this email, which raises procedural site specific concerns

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-109 (3 of 3).pdf
2. TLP19-109(2 of 3).pdf
3. TLP19-109.pdf

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
  Integrated Impact Assessment
  A particular section of the Traveller Local Plan
  A specific site or allocation in the Traveller Local Plan
  A specific policy in the Traveller Local Plan
  A paragraph or set of paragraphs in the Traveller Local Plan
  Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective

* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

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a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects new sites to be "well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood". The sites at Bulls Cross, The Ridgeway, and A10 (Transit site) are all, by contrast, situated at the edge of the built-up area in low PTAL Green Belt or MOL locations, which are remote from shops and services.

b.Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP Policies G2B and G3-C state: G2-B Exceptional circumstances are
required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. G3-C MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Exceptional circumstances must exist for boundary changes to Green Belt or MOL to be made and those circumstances can be justified only where no suitable brownfield or urban sites exist. We do not believe that all potential brownfield sites were adequately assessed, especially new sites suggested at the Regulation 18 stage. Therefore the threshold for exceptional circumstances has not been met.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

3. Specific site issues

Bulls Cross Nursery (Site 1)

In addition to our comments made at Regulation 18 about the impact on the Conservation Area, we also note that:

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states: The sites within the HELAA that were rejected for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be suitable for meeting Traveller accommodation needs.

The Bulls Cross Nursery site is therefore not in general conformity with LP21 Policy H14.

Land Adjacent to Ridgeway (Site 2)

Our comments above and at Regulation 18 about the lack of evidence for exceptional circumstances, the impact on the Area of Special Character
[DMD84], traffic issues along The Ridgeway and the fact that this site is not in a sustainable location remain valid.

In addition, we would note that this site lies within the area of PL9 Rural Enfield as evidenced by Figure 3.10 in the Rural Enfield Placemaking Vision. In contradiction, page 12 of the TLP Site Selection Topic Paper states that the area of PL9 Rural Enfield is not a 'reasonable alternative' for a Traveller site because it: 'encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.' This site is not identified in Policy P9 for anything other than landscape restoration.

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In addition to our comments at Regulation 18 about the impact on traffic on the A10 and the Skate Park itself, we would note:

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Facilities 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and subregional level. Needs assessments should include an audit of existing facilities, and Policy G4 (Open Space).

Therefore a decision about the allocation of Site 3 should be delayed until the appropriate evidence is available. Until then, the allocation fails the tests of soundness under NPPF 35.

Other sites

It appears unreasonable that Crews Hill PL11 and Chase Park PL10, two potential placemaking areas, have been included and not Meridian Water PL5. TLP 4.22 states that possible pitch provision at PL10 and PL11 will be identified only during the masterplanning process. That will involve the cooperation of multiple landowners, who may not be agreeable to pitch provision near their developments. Additionally, neither of the placemaking areas is currently in general conformity with the London Plan 2021.

By contrast, Meridian Water PL5, which is more sustainable and under Council control, is dismissed because no suitable residual land is available. Given that the long-term aspiration is for 10,000 homes at Meridian Water but only approximately 6,700 are expected to be built in the plan period up to 2041, it is disingenuous to claim that no land for pitch provision can be identified in this publicly-led regeneration project of strategic importance. This weakens the Council's "exceptional circumstances" case for Green Belt release.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land adjacent to Ridgeway (Site 2)

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

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Exceptional circumstances must exist for boundary changes to Green Belt or MOL to be made and those circumstances can be justified only where no suitable brownfield or urban sites exist. We do not believe that all potential brownfield sites were adequately assessed, especially new sites suggested at the Regulation 18 stage. Therefore the threshold for exceptional circumstances has not been met.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

3. Specific site issues

Bulls Cross Nursery (Site 1)

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The Bulls Cross Nursery site is therefore not in general conformity with LP21 Policy H14.

Land Adjacent to Ridgeway (Site 2)

Our comments above and at Regulation 18 about the lack of evidence for exceptional circumstances, the impact on the Area of Special Character
[DMD84], traffic issues along The Ridgeway and the fact that this site is not in a sustainable location remain valid.

In addition, we would note that this site lies within the area of PL9 Rural Enfield as evidenced by Figure 3.10 in the Rural Enfield Placemaking Vision. In contradiction, page 12 of the TLP Site Selection Topic Paper states that the area of PL9 Rural Enfield is not a 'reasonable alternative' for a Traveller site because it: 'encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.' This site is not identified in Policy P9 for anything other than landscape restoration.

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Facilities 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and subregional level. Needs assessments should include an audit of existing facilities, and Policy G4 (Open Space).

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Other sites

It appears unreasonable that Crews Hill PL11 and Chase Park PL10, two potential placemaking areas, have been included and not Meridian Water PL5. TLP 4.22 states that possible pitch provision at PL10 and PL11 will be identified only during the masterplanning process. That will involve the cooperation of multiple landowners, who may not be agreeable to pitch provision near their developments. Additionally, neither of the placemaking areas is currently in general conformity with the London Plan 2021.

By contrast, Meridian Water PL5, which is more sustainable and under Council control, is dismissed because no suitable residual land is available. Given that the long-term aspiration is for 10,000 homes at Meridian Water but only approximately 6,700 are expected to be built in the plan period up to 2041, it is disingenuous to claim that no land for pitch provision can be identified in this publicly-led regeneration project of strategic importance. This weakens the Council's "exceptional circumstances" case for Green Belt release.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to the accompanying document in this email, which raises procedural site specific concerns

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land at A10 (Site 3)

Comment Number: 4

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Introduction

Enfield RoadWatch welcomes the opportunity to comment on the Regulation 19 Draft Traveller Local Plan (TLP) (2020-2041). We also participated fully at the Regulation 18 stage.

2. General Conformity with the London Plan

We do not believe the TLP to be in general conformity with the London Plan 2021 (LP21), as is required. The Council has failed to take key LP21 policies into account: H14 (Gypsy and Traveller accommodation), G2 (Green Belt), G3 (Metropolitan Open Land), and broader strategic policies on connectivity, inclusivity, and spatial sustainability, such as H1, and T1–T4. In particular:

a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects new sites to be "well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood". The sites at Bulls Cross, The Ridgeway, and A10 (Transit site) are all, by contrast, situated at the edge of the built-up area in low PTAL Green Belt or MOL locations, which are remote from shops and services.

b.Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP Policies G2B and G3-C state: G2-B Exceptional circumstances are
required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. G3-C MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Exceptional circumstances must exist for boundary changes to Green Belt or MOL to be made and those circumstances can be justified only where no suitable brownfield or urban sites exist. We do not believe that all potential brownfield sites were adequately assessed, especially new sites suggested at the Regulation 18 stage. Therefore the threshold for exceptional circumstances has not been met.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

3. Specific site issues

Bulls Cross Nursery (Site 1)

In addition to our comments made at Regulation 18 about the impact on the Conservation Area, we also note that:

LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation) both require the use of a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities.

The Bulls Cross Nursery site was assessed in the HELAA 2023 as a potentially developable housing site for 79 homes but was subsequently rejected because of concerns about accessibility and isolation. Its inclusion in the TLP goes against the Council's Site Selection Topic Paper 3.20 which states: The sites within the HELAA that were rejected for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be suitable for meeting Traveller accommodation needs.

The Bulls Cross Nursery site is therefore not in general conformity with LP21 Policy H14.

Land Adjacent to Ridgeway (Site 2)

Our comments above and at Regulation 18 about the lack of evidence for exceptional circumstances, the impact on the Area of Special Character
[DMD84], traffic issues along The Ridgeway and the fact that this site is not in a sustainable location remain valid.

In addition, we would note that this site lies within the area of PL9 Rural Enfield as evidenced by Figure 3.10 in the Rural Enfield Placemaking Vision. In contradiction, page 12 of the TLP Site Selection Topic Paper states that the area of PL9 Rural Enfield is not a 'reasonable alternative' for a Traveller site because it: 'encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.' This site is not identified in Policy P9 for anything other than landscape restoration.

Land at A10 / Edmonton Skate Park (Site 3)

In addition to our comments at Regulation 18 about the impact on traffic on the A10 and the Skate Park itself, we would note:

Paragraph 5.20 of the Site Selection Topic Paper (September 2025) amends the allocation to include part of the skate park itself, necessitating the relocation of this popular facility. [New location unknown] Without an updated Playing Pitch Strategy, there is no evidence that this facility is surplus to requirements. The proposal therefore conflicts with LP21 Policy S5 Sports and Recreation
Facilities 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and subregional level. Needs assessments should include an audit of existing facilities, and Policy G4 (Open Space).

Therefore a decision about the allocation of Site 3 should be delayed until the appropriate evidence is available. Until then, the allocation fails the tests of soundness under NPPF 35.

Other sites

It appears unreasonable that Crews Hill PL11 and Chase Park PL10, two potential placemaking areas, have been included and not Meridian Water PL5. TLP 4.22 states that possible pitch provision at PL10 and PL11 will be identified only during the masterplanning process. That will involve the

cooperation of multiple landowners, who may not be agreeable to pitch provision near their developments. Additionally, neither of the placemaking areas is currently in general conformity with the London Plan 2021.

By contrast, Meridian Water PL5, which is more sustainable and under Council control, is dismissed because no suitable residual land is available. Given that the long-term aspiration is for 10,000 homes at Meridian Water but only approximately 6,700 are expected to be built in the plan period up to 2041, it is disingenuous to claim that no land for pitch provision can be identified in this publicly-led regeneration project of strategic importance. This weakens the Council's "exceptional circumstances" case for Green Belt release.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to the accompanying document in this email, which raises procedural site specific concerns

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Chase Park and Crews Hill

Comment Number: 5

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan

Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Introduction
Enfield RoadWatch welcomes the opportunity to comment on the Regulation 19 Draft Traveller Local Plan (TLP) (2020-2041). We also participated fully at the Regulation 18 stage.

2. General Conformity with the London Plan
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a. Policy H14 – Gypsy and Traveller Accommodation: LP21 expects new sites to be "well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood". The sites at Bulls Cross, The Ridgeway, and A10 (Transit site) are all, by contrast, situated at the edge of the built-up area in low PTAL Green Belt or MOL locations, which are remote from shops and services.

b.Policies G2 and G3 – Green Belt and Metropolitan Open Land: LP Policies G2B and G3-C state:
G2-B Exceptional circumstances are
required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. G3-C MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

Exceptional circumstances must exist for boundary changes to Green Belt or MOL to be made and those circumstances can be justified only where no suitable brownfield or urban sites exist. We do not believe that all potential brownfield sites were adequately assessed, especially new sites suggested at the Regulation 18 stage. Therefore the threshold for exceptional circumstances has not been met.

For these reasons, we do not believe the Traveller Local Plan can currently be considered in general conformity with the London Plan 2021.

3. Specific site issues

Bulls Cross Nursery (Site 1)

In addition to our comments made at Regulation 18 about the impact on the Conservation Area, we also note that:

LP21 Policy H14 (Gypsy and Traveller Accommodation) and draft Enfield Local Plan Policy H10 (Traveller Accommodation) both require the use of a clear, evidence-based methodology, ensuring that sites are sustainable, accessible and integrated with surrounding communities.

The Bulls Cross Nursery site was assessed in the HELAA 2023 as a potentially developable housing site for 79 homes but was subsequently rejected because of concerns about accessibility and isolation. Its inclusion in the TLP goes against the Council's Site Selection Topic Paper 3.20 which states: The sites within the HELAA that were rejected for housing have not been considered further as part of the TLP process, in part because if they have been deemed unsuitable for housing, they are also very unlikely to be suitable for meeting Traveller accommodation needs.

The Bulls Cross Nursery site is therefore not in general conformity with LP21 Policy H14.

Land Adjacent to Ridgeway (Site 2)

Our comments above and at Regulation 18 about the lack of evidence for exceptional circumstances, the impact on the Area of Special Character
[DMD84], traffic issues along The Ridgeway and the fact that this site is not in a sustainable location remain valid.

In addition, we would note that this site lies within the area of PL9 Rural Enfield as evidenced by Figure 3.10 in the Rural Enfield Placemaking Vision. In contradiction, page 12 of the TLP Site Selection Topic Paper states that the area of PL9 Rural Enfield is not a 'reasonable alternative' for a Traveller site because it: 'encompasses existing villages and countryside, much of which is Green Belt. No identified new development land beyond settlement boundaries.' This site is not identified in Policy P9 for anything other than landscape restoration.

Land at A10 / Edmonton Skate Park (Site 3)

In addition to our comments at Regulation 18 about the impact on traffic on the A10 and the Skate Park itself, we would note:

Paragraph 5.20 of the Site Selection Topic Paper (September 2025) amends the allocation to include part of the skate park itself, necessitating the relocation of this popular facility. [New location unknown] Without an updated Playing Pitch Strategy, there is no evidence that this facility is surplus to requirements. The proposal therefore conflicts with LP21 Policy S5 Sports and Recreation
Facilities 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and subregional level. Needs assessments should include an audit of existing facilities, and Policy G4 (Open Space).

Therefore a decision about the allocation of Site 3 should be delayed until the appropriate evidence is available. Until then, the allocation fails the tests of soundness under NPPF 35.

Other sites

It appears unreasonable that Crews Hill PL11 and Chase Park PL10, two potential placemaking areas, have been included and not Meridian Water PL5. TLP 4.22 states that possible pitch provision at PL10 and PL11 will be identified only during the masterplanning process. That will involve the cooperation of multiple landowners, who may not be agreeable to pitch provision near their developments. Additionally, neither of the placemaking areas is currently in general conformity with the London Plan 2021.

By contrast, Meridian Water PL5, which is more sustainable and under Council control, is dismissed because no suitable residual land is available. Given that the long-term aspiration is for 10,000 homes at Meridian Water but only approximately 6,700 are expected to be built in the plan period up to 2041, it is disingenuous to claim that no land for pitch provision can be identified in this publicly-led regeneration project of strategic importance. This weakens the Council's "exceptional circumstances" case for Green Belt release.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to the accompanying document in this email, which raises procedural site specific concerns

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 110 - Andrea Ktorou

Respondent: Andrea Ktorou

Submission Number:110

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to raise my objections to the proposal for this area to be turned into the traveller site. My objections have nothing to do with who will be living on that area but that this area should not be developed at all this is green belt land it is located on a already very busy road the extra cars and traffic adding to pollution and to the risk of accidents.
The turning on that road is already very precarious.

Also I am aware that other sites have been rejected as unsuitable for the exact same reasons as this site. Surely there is a site that will not encounter all these problems and that is a safe area for the travellers to settle.

There is a distinct lack of utilities and services in that area the cost of getting it up to standard is ridiculous when you consider other sites do not have these issues.

The area itself is not suitable for any type of development is constantly boggy.

Please consider the safety of the people that live there the school and the travellers when thinking of putting a major influx of traffic and cars coming in and out of an already dangerous and fast moving road.

TLP19- 111 - Newell

Respondent: **Newell**

Submission Number:111

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I object to the proposed transit site.

The proposed site will be large and it is inappropriate for it to be placed near Firs Farm Wetlands. Firstly the site is Metropolitan Open Land and is enjoyed by all the diverse communities that reside in Enfield.

The proposal is actually against The London Plan and Enfield Local Plan.

Enfield Council has not conducted a study to assess the impact of the proposed site will have on the Firs Farm Wetlands and the impact on the residents.

Enfield Council has not considered :

1. The increase in air pollution due to increased traffic which will have a negative impact on the residents and their children.

2. Noise pollution, which will have a negative impact on residents and their children.

3 . The impact of air and noise pollution on the sensitive Firs Farm Wetlands ecosystem and the wildlife which could be disastrous.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-111.pdf

TLP19- 112 - Susan Draper

Respondent: Susan Draper

Submission Number:112

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to object to the Proposed planning Request for a Travelers Site on The Ridgeway Enfield for the following reasons.

This proposed site is on Green Belt Land.

I don't feel this Site has the local facilities that 12 additional families would require, also it is extremely close to a very noisy road.

This road is an extremely busy road with a high-speed limit and also very heavy goods traffic. To Introduce about two to three times the amount of traffic using this junction would seriously increase risk to an already very dangerous Junction

The Proposed Site is a very muddy field and very swampy, therefore difficult to make suitable for Vehicles / Caravans.

I feel that there would be a loss to the local Environment and Wildlife.

The existing Utilities are very poor. No Sewage, Drainage, Gas, very poor Electricity Supplies, and very low water pressure.

There is also many Local School Children use this Bus Stop, and the increased traffic at this junction would seriously endanger their Safety while wating for Busses.

There have been other similar sites that have been discarded or declared unsuitable,

There must be new sites which would be more suitable for Travellers and local Residents.

I therefore feel that this proposed site should also be rejected.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-112.pdf

TLP19- 113 - Phillip Hawes

Respondent: Phillip Hawes

Submission Number:113

Submission Date:05/11/2025 09:00 GMT

3 Enfield's Traveller Needs

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

- a) the Council's own evidence rated the contribution of the site to MOL Criteria 1 (see evidence from 2023 LUC Study, PDF page 75) as moderate, but the remainder of the Edmonton Cemetery site was Strong. This is explained by the Site Selection Methodology Paper (para 5.22), but this is not justified.
- b) Noise reduction through boundary treatments, which will be necessary, are unlikely to insulate the occupants from the A10.
- c) Page 36 of the Traveller Local Plan mention's that the site meet transit needs identified in the Enfield 2024 GTANA.(Gypsy and Traveller Accommodation Needs Assessment). However Enfield 2024 GTANA does not define "transit" in the context of the actual requirements for sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		
Start of the examination		
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report		
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-113 main.pdf
2. TLP19-113.pdf

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole

Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

- a) the Council's own evidence rated the contribution of the site to MOL Criteria 1 (see evidence from 2023 LUC Study, PDF page 75) as moderate, but the remainder of the Edmonton Cemetery site was Strong. This is explained by the Site Selection Methodology Paper (para 5.22), but this is not justified.
- b) Noise reduction through boundary treatments, which will be necessary, are unlikely to insulate the occupants from the A10.
- c) Page 36 of the Traveller Local Plan mention's that the site meet transit needs identified in the Enfield 2024 GTANA.(Gypsy and Traveller Accommodation Needs Assessment). However Enfield 2024 GTANA does not define "transit" in the context of the actual requirements for sites.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)

Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan		
Start of the examination		
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report		
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-113 main.pdf
2. TLP19-113.pdf

TLP19- 114 - Jackie Johnstone

Respondent: Jackie Johnstone

Submission Number:114

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to respond to the consultation for the proposed travellers' site on The Ridgeway.

I would strongly like to object to the proposal for the following reasons:

- This is Greenbelt Land that should be preserved.
- There is already heavy traffic on The Ridgeway and this would increase it substantially causing road safety concerns.
- There would be a huge impact on the immediate local community. At present there are only 5 houses here but the proposal is for 12 traveller families which would change the nature of the community disproportionally.
- Wildlife and environmental impact would be negative and high.

I appreciate you listening to my concerns.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-114.pdf

TLP19- 115 - Anne Denby

Respondent: Anne DenbyCanal & River Trust

Submission Number:115

Submission Date:05/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

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Thank you for your consultation on the above document. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust have reviewed the documents and information contained within the Submission Traveller Local Plan and based on the information available we have no comment to make.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-115 main.pdf
2. TLP19-115.pdf

TLP19- 116 - Leah Aislabie

Respondent: Leah Aislabie

Submission Number:116

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to formally object to the proposed development of a travellers' site at The Ridgeway.

The proposed site lies within designated greenbelt land, which is intended to preserve the natural environment and prevent urban sprawl. Developing this area contradicts the principles of greenbelt protection and sets a concerning precedent for future encroachments. There are alternative sites that have been dismissed despite facing similar challenges to The Ridgeway, and I believe these should be reassessed before sacrificing protected land.

The planned site is adjacent to a bus stop regularly used by school children. An increase in traffic, particularly vehicles turning in and out of the site, poses a significant safety hazard. The road infrastructure is not designed to accommodate this surge in usage, and the risk of accidents—especially involving young pedestrians.

The Ridgeway and its surrounding greenbelt support a diverse range of wildlife and contribute to the local ecosystem. Development would lead to habitat destruction, noise pollution, and long-term environmental degradation. Once lost, these natural assets cannot be easily restored.

In light of these concerns, I respectfully request that the planning committee reject this proposal and instead explore more suitable, less environmentally sensitive locations.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-116.pdf

TLP19- 117 - Franco Sidoli

Respondent: Franco Sidoli

Submission Number:117

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writng to object to the proposed development on the Ridgeway which I understand is to take place on Green Belt land .

My objections are as follows ;

1) As a frequent user of the road I believe that access and egress to and from the site will cause disruption to traffic and may result in numerous road traffic accidents . This section of road simply cannot withstand interruption to the free flow of traffic as vehicles attempt to access the site . The existence of a Bus Stop is yet another issue and one must be conscious that the Stop is used by children so another exit / entrance nearby would be dangerous from a Health and Safety perspective .

2) The site will be detrimental to the Green Belt and negate the whole purpose of having this policy. The nature of the countryside will be permanently and adversely a ected by the development as the openness of the Green Belt will be lost . The development will undoubtedly a ect the current natural ecosystem -especially as the infrastructure to service such development will need to be installed causing much disruption some of which will be permanent .

In conclusion I am sure that there are other more suitable “brown field “ sites in the Borough where there would be less negative impact on Health,Safety and the Environment.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-117.pdf

TLP19- 118 - Emma Beacham

Respondent: Emma Beacham

Submission Number:118

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to the Ridgeway

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I have been a resident of Enfield all my life. Whilst I am more than open to change and making our town better there
are certain things u can't agree with. I would like to oppose the proposed travellers site on the Ridgeway. My concerns are:
* the extra traffic that the already busy ridgeway will have to handle.
* There will be extra noise and general polluttion to our lovely ever shrinking greenbelt.
* very close proximity to a school.
* how much will need to be spent on the land to make it accessible and liveable with no amenites already in place?

Is there not a better site in the borough?

TLP19- 119 - Peter Harris

Respondent: Peter Harris

Submission Number:119

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

With reference to the above proposed Traveller site location, I wish to express my objections, on the basis that I consider the location to be inappropriate for a Traveller site, for the following reasons:

1. The Ridgeway site is designated Green Belt and the LTP does not provide exceptional circumstances for removing this site's Green Belt designation.

2. The proposed site location, being as remote as it is, has very limited utility provisions; I particularly note:

a. Mains water supply pressure is already very low for the residents located in within the area and to add further populations through the addition of the proposed Traveller site, will make the matter worse for the existing residents and provide the Traveller community with a poor water supply, which is unlikely to meet their needs.

b. I understand that there is no mains sewer provision within the area, with a cess pit provided for the existing residents. The addition of the Traveller community is likely to require the construction of an additional cess pit, which would represent further additional and unnecessary expense.

c. I understand there not to be an internet provision within the area, which again is likely not going to meet the Travellers' needs.
d. There is no mains gas provision within the area, necessitating the Travellers having to use bottled gas, which apart from being less convenient, will necessitate frequent and regular delivery lorries
replenishing the bottles as well as potential safety issues associated with a large number of gas bottles within a small area.

3. The proposed site location will result in additional vehicular traffic accessing and egressing the Ridgeway, which will contribute to issues around congestion and safety risk, particularly with the close proximity to a bus stop. This will be exacerbated by the increased heavy lorry traffic, generated by the environmental scheme proposed for the Holly Hill Farm site, just down the road.
4. The proposed site location is very close to a school and to a bus stop, from which many children access and egress the school and I am concerned that this will introduce wellbeing and safety issues for those children, particularly with the increased vehicular traffic and the need for children to cross the already busy road to access the school and bus stop.

5. I understand the proposed site location to be naturally boggy and to suffer from flooding; this is unlikely to meet the Traveller community needs, unless very expensive and disruptive corrective measures are undertaken. If such corrective measures and/or the Travellers' accommodation includes the construction of hard standings, this is likely to increase the quantity of rain water run-off onto the Ridgeway, which is likely to result in flooding and to a further deterioration in the condition of the road. The road is already suffering from inconsistent settlement, resulting in a very bumpy road surface that has necessitated the Council erecting warning signage and represents an increased likelihood of serious accident; further run-off is likely to result in exacerbation of these issues, with potential for loss of life and the cost and disruption of road reconstruction.

6. The proposed site location is quite remote, with no local shops, state schooling, or other amenities; this will necessitate the Travellers, either having to use their cars, or the infrequent bus service to access all amenities; this does not sound to be convenient to the Traveller community and additionally is environmentally damaging (increased road congestion, pollution, etc).

7. The proposed site location doers not appear to meet the recommended layout for a Traveller site, in that it is triangular in shape, as opposed to the desired circular, or horseshoe layout and not very spacious; this again, is unlikely to meet the needs of the Traveller community and furthermore, such a density of accommodation building will further detract from the appearance of the area, which again will contrast significantly from the site's existing Green Belt appearance.

I strongly recommend therefore that the proposal to locate a Traveller site adjacent the Ridgeway, be scrapped and replaced with a more suitable and well-considered proposal.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-119.pdf

TLP19- 120 - Filiz Djafer

Respondent: Filiz Djafer

Submission Number:120

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

As a longstanding resident of Enfield I am appalled at the Traveller site proposal.

I use the Ridgeway daily, it is a very busy road and I do believe that a proposal of this magnitude would be detrimental to the already busy area.

If this were to go ahead, there would be negative implications on the chase farm hospital, local school & the local buses. Traffic would become ridiculous & I can't imagine the potential chaos in the
mornings as everyone tries to get onto the M25.

The Traffic on The Ridgeway would be heavily Increased, therefore affecting the general road safety.

Also the Lack of utilities. There is no gas, no sewers, no internet & no electricity supply. All these make this area an unsuitable choice for this type of usage.

I am concerned that this proposal does not consider Wildlife loss and the visual implications to the area The Safety of school children using the bus stops.

I object to this and as a community we will need to stand together to ensure that our voices are heard.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-120.pdf

TLP19- 121 - Alex Koster

Respondent: Alex Koster

Submission Number:121

Submission Date:05/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to the Ridgeway

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please accept this email as strong objection and dissatisfaction in relation to the proposed plans to create a travellers site along the Ridgeway.

My concerns are:
Yet again the council are trying to get rid of very important Greenbelt Land. This is NOT acceptable. This borough must protect its countryside for our children's future. It must protect the Wildlife and the Environment.
Other sites have been discarded or unsuitable for the same issues as The Ridgeway site.
Traffic on The Ridgeway - Increased traffic - Fast part of the road - Busy - Dangerous turning/entrance - general road safety. This area is extremely close to a school so have concerns over the safety of
school children using bus stop nearby.
Impact on local community Only 5 houses here but proposed 12 traveller families which is disproportionate and concerns over facilities in a limited area.

There are lack of utilities (no gas, no sewers, no internet, low water pressure and weak electricity supply).
Field is unsuitable for the travellers needs - Boggy field, boundary of field adjacent to fast road, not close to town or any facilities.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-121.pdf

TLP19- 122 - Tony Guiver

Respondent: Tony Guiver

Submission Number:122

Submission Date:05/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 4

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
* Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

I encountered error messages when attempting to download the form and while trying to use the 'Add comment' feature on the website. As a result, I have copied and pasted my full response into both this email and the attachment.

I firmly believe the process should be made significantly more transparent and presented in plain language, so everyone in the community can easily participate in these consultations. This would make the process far more inclusive and accessible for all members of the community.

I strongly believe that the A10 space is not a site fit for the purpose of use as a transit site for the travelling community. I also believe that it would be to the detriment of the health and wellbeing of both the travelling and local community as well as to the fragile ecosystem and special SINC site of the local Firs Farm wetlands

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-122 (3 of 3).pdf
2. TLP19-122(2 of 3).pdf
3. TLP19-122.pdf

1 Introduction

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Introduction

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Traveller Local Plan Regulation 19
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.

My Response 1_ 82 words:
I acknowledge the importance of addressing the present accommodation needs of Gypsies and Travellers.
However, I feel it is essential that we also plan for future requirements by identifying suitable sites now that could be expanded over time. By doing so, we can ensure that growing demand is met in a considered way, without compromising the well-being of the existing community. This proactive approach would help provide sustainable solutions both for Travellers and for the wider borough in the years ahead.

Land at A10 (Site 3)

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

My Respone overall to this process:
I firmly believe the process should be made significantly more transparent and presented in plain language, so everyone in the community can easily participate in these consultations. This would make the
process far more inclusive and accessible for all members of the community. I strongly believe that the A10 space is not a site fit for the purpose of use as a transit site for the travelling community. I also believe that it would be to the detriment of the health and wellbeing of both the travelling and local community as well as to the fragile ecosystem and special SINC site of the local Firs
Farm wetlands .

Policy TLP1 Sites for Travellers

Comment Number: 5

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

TLP1 Sites for Travellers

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

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 1 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 (See table in respondents PDF submission / Draft TLP Policy TLP1).

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.

My Response 2 _ 56 words :

Using more green belt land is preferable to allocating a small, valuable MOL parcel near the SINC in Firs Farm Wetlands, which effectively serves local residents. Placing the travelling community closer to the
M25/A10 would make travel easier and situate them near proposed sites with more space, rather than confining them to a cramped, hard-to-access location.

Appendix C: Monitoring Framework

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Appendix C: Monitoring Framework

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

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).

See Tables Policy TLP1 and Policy TLP 2 monitoring tables (Respondent PDF/Draft TLP)

My Response 117 words:
Regarding Appendix C: Monitoring Framework, I support the clear approach to tracking policies, particularly around data transparency and annual reporting. I believe that including qualitative feedback from the traveller community about site suitability and design, alongside the quantitative metrics suggested such as pitch numbers and planning permissions; this will ensure that policies are responsive to both targets and community needs.

It would also be valuable for the framework to give careful consideration to environmental impacts, especially in highly sensitive areas such as Firs Farm Wetlands, when evaluating potential sites. Ongoing monitoring and comprehensive reporting for these locations should be prioritised, and it may be prudent to consider alternative locations where environmental sensitivities are less pronounced.

TLP19- 123 - Laura (&Kevin Chan) Vitzthum

Respondent: Laura (&Kevin Chan) Vitzthum

Submission Number:123

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to object to the proposed allocation TLP_01 – Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. I believe the allocation of this site is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy, my reasons for this are as follows:

1. Green Belt and Local Open Space:

The Bulls Cross site's release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Sustainability Appraisal records "significant negative" effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:
The overall plan over provides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy. There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less constrained sites could meet the Borough's needs without causing such material harm to the Green Belt/open space at Bulls Cross and must be sought through another call for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield LP. It is therefore untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical importance.

4. Deliverability and Fire Safety:
The Council's assumed 8 pitches ignore site shape, access and tree constraints. Initial spatial analysis supports only 3–4 deliverable pitches, below the Council's own 6-pitch threshold. However, once critical BRE Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not being deliverable in compliance with BRE Fire Safety Guidance

5. Trees, Ecology and Root Protection:
Numerous Category A & B trees would be lost or compromised, causing damage to biodiversity, visual harm and adverse impact on the deciduous woodland priority habitat (part), Conservation Area, Green Belt, local open space and Listed assets. The proposed development would encroach on root protection areas contrary to British Standards and best practice guidance.

6. Accessibility and Sustainability
Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The a swept-path analysis would evidence how the turning head and entranceway are inadequate and poorly located, conflicting with highways design standards and the TLP's own layout requirements. There will be significant environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

Conclusion:
TLP_01 is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and stakeholders before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-123 main.pdf
2. TLP19-123.pdf

TLP19- 124 - Seija Heinonen

Respondent: Seija Heinonen

Submission Number:124

Submission Date:05/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I wish to object to the proposed allocation TLP_01 – Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. I believe the allocation of this site is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy, my reasons for this are as follows:

1. Green Belt and Local Open Space:

The Bulls Cross site's release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement
boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Sustainability Appraisal records "significant negative" effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:

The overall plan over provides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails

NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy.

There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less constrained sites could meet the Borough's needs without causing such material harm to the Green

Belt/open space at Bulls Cross and must be sought through another call for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield LP. It is therefore

untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical importance.

4. Deliverability and Fire Safety:

The Council's assumed 8 pitches ignore site shape, access and tree constraints. Initial spatial analysis supports only 3–4 deliverable pitches, below the Council's own 6-pitch threshold. However, once critical BRE

Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not being deliverable in compliance with BRE Fire Safety Guidance.

5. Trees, Ecology and Root Protection:

Numerous Category A & B trees would be lost or compromised, causing damage to biodiversity, visual harm and adverse impact on the deciduous woodland priority habitat (part), Conservation Area, Green Belt, local open space and Listed assets. The proposed development would encroach on root protection areas contrary to British Standards and best practice guidance.

6. Accessibility and Sustainability

Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The a sweptpath analysis would evidence how the turning head and entranceway are inadequate and poorly located,

conflicting with highways design standards and the TLP's own layout requirements. There will be significant environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

Conclusion:

TLP_01 is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and stakeholders before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-124 main.pdf
2. TLP19-124.pdf

TLP19- 125 - Peter Fallart

Respondent: Peter FallartEdmonton & Winchmore Hill Conservative Association

Submission Number:125

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

- Not positively prepared
- Not justified
- * Not effective
- Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

My objections to the inclusion of the A10 site as a transit site are as follows:

1. The site is inadequate to meet the minimum number of 15 caravans set out in the delivery requirements (Appendix B - Site 3). The average car and caravan are between 12 to 15ft and the lack of room to manoeuvre vehicles could lead to cars and caravans trying to reverse onto the A10. Given travellers will want to park their cars on the site as well suggests at best only 5 to 6 caravans could be accommodated comfortably. Or are the Council suggesting the cars are parked in the already congested surrounding roads?
2. Maintaining the pedestrian route across the site (which is a requirement set out in the design principles) as well planting a screen to the A10 will further impact the sites capacity.
3. The exceptional need to release this Metropolitan Open Land has not been established, when there are other sites such as Meridian Water which haven't been considered. Why haven't these more suitable sites been considered?
4. The site plans do not appear to comply with the Communities and Local Government Good Practice Guide for Traveller Sites. In particular the following is not addressed adequately or at all. Indeed the site is too small to properly address some.

- Adequate access for emergency vehicles (A10 access may be problematic)
- The need for water drainage and storm water drainage
- The connection of pitches either to a sewage system or a septic tank
- Waste disposal facilities either for individual pitches or the site
- Accommodation for a site manager
- Pitches should ideally not exceed 15 -current plan says this is a minimum
- To ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 metres from any other trailer, caravan or park home that is occupied separately. Size of the site would make this difficult if more than a few pitches were planned.

5. The only access to the site is from the A10 a busy dual carriageway. The site is close to the junction of another busy main road, Church Street. It is difficult to see how caravans can manoeuvre safely onto this site. Have TfL been consulted and what is their view?
6. The Council has not provided any transport modelling to show how vehicles can safely access the site from the A10. On this ground alone inclusion of this site cannot be justified.
7. The plan doesn't consider the impact on the Cemetery and Cemetery House. A transit site will generate a lot of additional noise and pollution. This will impact burials in the cemetery and services at the Chapel of Rest. The siting of a transit site here is not sensible
8. Loss of amenity. The skatepark is a much loved and well used sports facility used by younger residents, which the Friends of the skatepark have plans and funding to develop (now on hold depending on the local plan decision). Loss of the skatepark goes against Council policies to develop sport and play facilities. The document contains a vague promise to relocate but it is unclear where and how close to the existing site. Recreating it too far away will mean existing local users will lose out.
9. There is no definition in the plan of what a 'transit site' actually is. How will the Council ensure that that this transit site won't become a permanent site

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposed site on the A10 is inadequate for the purpose and should be removed from the plan. Alternative sites should be sort particularly from sites not considered such as Merdian Water.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As a local Councillor I want to raise amongst other things, of the inadequacy of the proposed site for a transit site. Its potential impact on my constituents and on the adjacent cemetery and on the road safety issues of the only access being via the A10

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-128.pdf

TLP19- 126 - Susan Mumford

Respondent: Susan Mumford

Submission Number:126

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

It will be an unsafe site due to the location on the very busy A10 road near traffic lights in a built up residential area. Residents on Sayersbury Way Estate were denied access to the A10 for that reason. (continue below) Local children are being deprived of somewhere to go, which they don't have to go far to get to, which keeps them safe and off the streets.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

There are better sites for the travellers to go, one of them being on a piece of land behind Picketts Lock Cinema

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-126.pdf

TLP19- 127 - John Mumford

Respondent: John Mumford

Submission Number:127

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This is a major junction on a very busy and fast road. Vehicles towing caravans going in and out would be extremely dangerous. It also serves as a bus stop, where children at peak ties use buses to travel to and from school.

There are organisation who are prepared to invest and improve the site. This activity is now an officially olympic sport since Tokyo 202 games. And as a local authority you should be encouraging the youth and not depriving them of sport activities.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-127.pdf

TLP19- 128 - Cllr Kathleen Patricia Gregor

Respondent: Cllr Kathleen Patricia Gregor

Submission Number:128

Submission Date:05/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I want to object to the proposal of having a [redacted] where the skateboard park is now situated. My reasons for this unsuitable site is because it would be a danger to road users on the A10 to have young children and dogs---most travellers have dogs--both seriously in danger of causing an accident through straying onto the VERY busy road. To have caravans coming and going off this road is going to cause back ups of traffic and very near the junction for Church street traffic lights, which is again an unsuitable location because of its location.

My second objection is that it is a two minutes walk on the pathway from the cemetery where people go day and night to spend a peaceful time with their loved ones, and many fear that this peaceful area with all the [redacted] and because most people are elderly they would also indeed feel threatened.

My third objection is that young people come from all over Enfield on the two bus access to this park and many have told me that this park has saved them from becoming involved in gangs and has actually saved their lives from a life of crime ! I had no idea the profound effect that this particular skate park had on the youth of today. The young people had made it their own and were

in the process of getting the toilet block re-opened with the funding they had secured. The visiting people from the cemetery would also have a toilet to go to as there is none in the cemetery. In the very near future a cafe was in the pipeline--forgive the pun--to have a place where the youth could also enjoy hot or cold drinks.

In this day and age where obesity is an issue with one in four young people being overweight, having the opportunity to exercise in a safe area is needed. Also I was amazed to find out there was once tennis courts that through thoughtlessness had been dismantled and many young people who could have also played tennis cannot because they could not afford the fees that private clubs charge.

As a ward councillor I am stopped every other day by people asking WHAT the council are thinking by even considering this site as suitable. [redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-128.pdf

TLP19- 129 - Jack Mumford

Respondent: Jack Mumford

Submission Number:129

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

No residents have been informed officially, it is a health and safety concern if it goes ahead due to a busy dual carriageway, having a travellers site there makes no sense and would not only cause hazards of vehicles constantly in and out it would deprive the youth of the skate park, there needs to be equal support for activities that are already being occupied, if this goes there will be nothing nearby and making a residential area over a community public space feels like a huge breach in several ways.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This should be presented to better suited unoccupied land, such as lee valley camping grounds or green space near Pickets Lock cinema

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-129.pdf

TLP19- 130 - Andrew Lack

Respondent: Andrew LackThe Enfield Society

Submission Number:130

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

- Not positively prepared
- * Not justified
- * Not effective
- * Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The Society believes the inclusion of this site for Traveller use is unsound and should be deleted from the Plan. This is based on the following reasons.

1. Site falls within the Forty Hill Conservation Area (Area 5 Bulls Cross)

The Conservation Area is characterised and defined in the Forty Hill Conservation Area Character Appraisal 2015 [1]. A map of the Conservation Area can be found in Figure 6 on page 18. Para 2.1.3 characterises the Conservation Area as "overwhelmingly that of a rural settlement". Site 1 lies in an Area of Archaeological Importance (AAI) (para 2.3.6) and para 2.3.7 notes that "its archaeological potential remains intact".

The Enfield Characterisation Study [4] (page 20) says "The character of the Conservation Area itself is overwhelmingly that of a rural settlement, giving way to farmland to the north and west."

2. Harm to the setting of Grade II listed Myddelton House and Gardens

Site 1 is directly opposite Myddelton House. This Grade II property [5] is described in detail in [1] in section 2.6 et seq. Para 2.6.2 notes "A simple entrance lodge, and wrought iron gates, provide an entrance that is dignified rather than ostentatious."

The report [1] addresses the impact of development to the west of the house in para 2.6.7 and noted "Any further built development on open land adjacent to the site would exacerbate the impact of the training ground and put the surviving elements of the historic semi-rural setting of Myddelton House at risk." Considering that Site 1 is directly adjacent to the House, this says that any further development would harm the setting of the House.

3. Harm to the character of Bulls Cross

The Character of Bulls Cross is analysed in [1] is section 2.10 on pages 60 et seq. Among the points listed these are of relevance to the proposals:
• High hedges line the eastern side of the road, blocking views of the Bulls Cross open space beyond and reinforcing the rural character of the area (para 2.10.1)
• As with other settlements in the Conservation Area, boundaries make an important contribution to the character of the area (para 2.10.3)

In order for Site 1 to be workable a significantly enlarged entrance will be required in order to create sufficient space for towing vehicles to enter and leave the site. Bulls Cross at the point of entrance is a narrow road. The current site boundary is formed of high hedge with only a simple pair iron railing gates. Any changes to this design, however carefully planted, cannot alter the size of the open entrance space and the consequent damage to the rural quality of Bulls Cross.

4. Site is isolated

Site 1 is very isolated for a permanent community. This is not in conformity with the following Planning Policies and HM Government guidance.

4.1 Not in conformity with current or proposed Strategy

Current Core Policy 6[7] first point (policies for Housing and Services) (page 50) says "The site has good access to shops, health care, school and other education facilities;"

The proposed new Enfield Local Plan Policy H10 para 2(b) says “the site provides convenient access to health care, retail and educational school facilities with available capacity”

The nearest supermarkets are either south on the A10 (2.2 miles) or on the Hertford Road (2 miles). The closest primary school is Forty Hill CE School (0.2 miles) or Worcesters Primary School, Goat Lane (0.9 miles).

4.2 HM Government Guidance

[8] Policy B Point 13 requires that “Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally.” Site 1 is not sustainable within the context of this guidance.

4.3 London Plan 4.14.1

London Plan Policy H14 [10] 4.14.1 says “should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.” Site 1 is not “well connected” within this context.

4.4 Very low PTAL rating

[11] confirms that the site has a PTAL rating on zero. No buses run along Bull’s Cross.

Compensatory Improvements
The Green Belt Exceptional Circumstances Topic Paper [9] sets out how the release of the Green Belt will be compensated, as required by NPPF. Paras 4.41 to 4.46 prevails upon BG7 in the Enfield Local plan as well as the Enfield Chase Landscape Restoration Project.

However, these are not yet Policy and Examination of the Enfield Local Plan has already heard arguments that much of what is proposed in BG7 has already been funded outside of the Planning system by DEFRA and others and so cannot be considered as ‘compensatory improvements’ within the context of National Policy.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sites 1 and 2 should be removed from the Plan to make it sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To advance our points made through the Regulation-19 process.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land adjacent to Ridgeway (Site 2)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The Society believes the inclusion of this site for Traveller use is unsound and should be deleted from the Plan. This is based on the following reasons.

1. Harm to the Area of Special Character

Site 2 lies within the Area of Special Character, 1B [2] page 9. This is an extant Policy (DMD84) [6] within the current Core Strategy [7]. Site 2 lies on a ridge and sits between area 1A and 1B.

DMD84 (page 121) says “New development within the Areas of Special Character will only be permitted if features or characteristics which are key to maintaining the quality of the area are preserved and enhanced.”

Site 2 lies in an elevated, prominent position within the Area of Special Character.

The Enfield Society commissioned ENPlan to carry out an appraisal of the Landscape of Enfield Chase and their report is submitted with this representation as [3]. The report looked at the impacts of proposed Policies and Allocations within the Enfield Local Plan (now at Examination) but the report is relevant to the Traveller Local Plan insofar as it also made an assessment of whether Enfield Chase was a Valued Landscape in terms of NPPF. The report concluded that it was [3] section 4.33 page 38.

The Enfield Characterisation Study [4] makes reference to The Ridgeway on page 122: “Most of the area of the Farmland Valleys and Ridges landscape type is of high landscape quality and is highly valued by the borough’s residents.” and “There are many points (particularly from the Ridgeway and Stagg Hill) where fine, long distance views across the rolling landscape can be enjoyed. Many of these feel very rural and remote in character and the area provides a valuable opportunity to enjoy a special rural landscape which is easily accessible from the adjacent urban areas.”

In Summary we note that [3] confirms that Enfield Chase is a valued landscape for NPPF and that [4] noted the Ridgeway’s “special rural character”.

2. Harm to the setting of North Lodge

The site is within 400m of the Grade II listed North Lodge (Registration 1260834), now part of St John’s School.

3. Site is isolated

Site 2 is very isolated for a permanent community. This is not in conformity with the following Planning Policies and HM Government guidance.

3.1 Not in conformity with current or proposed Strategy

Current Core Policy 6[7] first point (policies for Housing and Services) (page 50) says “The site has good access to shops, health care, school and other education facilities;”

The proposed new Enfield Local Plan Policy H10 para 2(b) says “the site provides convenient access to health care, retail and educational school facilities with available capacity”

The nearest primary school is likely to be Livingstone Primary in Barnet, distance 5 miles. The nearest secondary school is Southgate (5 miles) or Potters Bar: Mount Grace, 9 miles; Dame Alice Owen, 11 miles.

Nearest supermarkets are: Sainsbury's Potters Bar (3.2 miles) or Asda Southgate (5.6 miles).

3.2 HM Government Guidance

[8] Policy B Point 13 requires that "Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally." Site 2 is not sustainable within the context of this guidance.

3.3 London Plan 4.14.1

London Plan Policy H14 [10] 4.14.1 says "should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood." Site 2 is not "well connected" within this context.

3.4 Low PTAL rating

[11] gives a PTAL rating of 1A. Bus service 313 (Chingford to Potters Bar) passes the site. This service provides 4 buses per hour (peak), three an hour (off-peak) and 2 and hour (Sunday).

Compensatory Improvements
The Green Belt Exceptional Circumstances Topic Paper [9] sets out how the release of the Green Belt will be compensated, as required by NPPF. Paras 4.41 to 4.46 prevails upon BG7 in the Enfield Local plan as well as the Enfield Chase Landscape Restoration Project.

However, these are not yet Policy and Examination of the Enfield Local Plan has already heard arguments that much of what is proposed in BG7 has already been funded outside of the Planning system by DEFRA and others and so cannot be considered as 'compensatory improvements' within the context of National Policy.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sites 1 and 2 should be removed from the Plan to make it sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To advance our points made through the Regulation-19 process.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Policy TLP2 Design and Site Layout

Comment Number: 3

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Policy TLP2 Design and Site Layout

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Policy TLP2
TLP2 Clause 19 does not make sense. How can “external lighting” have an impact on the surrounding area. Surely, this should be “internal lighting”.

TLP2 is unclear if the “amenity building with living room, kitchen and WC” applies to each permanent pitch or the site as a whole

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sites 1 and 2 should be removed from the Plan to make it sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To advance our points made through the Regulation-19 process.

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Submission of the Plan	✓	
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Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-130 (1 of 6) main.pdf

2. TLP19-130 (2 of 6).pdf
3. TLP19-130 (3 of 6).pdf
4. TLP19-130 (4 of 6).pdf
5. TLP19-130 (5 of 6).pdf
6. TLP19-130 (6 of 6).pdf

TLP19- 131 - Andrew Lack

Respondent: Andrew LackBush Hill Park Residents Association

Submission Number: 131

Submission Date: 12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 5

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

- Not positively prepared
- * Not justified
- * Not effective
- * Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Site 3, A10, Transit Pitches
It is the opinion of the BHPRA the inclusion of this site in the Traveller Local Plan (TLP) is unsound and should be removed from the proposals. We reach this view in light of the following points.

1. Contribution to MOL Criteria 1
The Council provides evidence of the contribution to MOL criteria 1 for this site in document Green Belt and MOL Assessment (2023) [1]. The evidence is contained in paras 7.8 – 7.10 together with the Criteria 1 map on page 75. The map is of a very low quality making it very difficult to see precisely what LUC are concluding, but it appears that the Edmonton Cemetery site is classified as "high contribution to MOL Criteria 1" with a small section in the north rated as "moderate". This appears to be Site 3.

Further evidence is presented in the Site Selection Methodology Paper [2], para 5.22, page 27. The evidence points to "a disused public WC building, skate park and hardstanding" as justification for reducing the contribution to MOL Criteria 1. However, hard standing and built form also exist, in larger amounts on the remaining part of the MOL designation, by way of a large chapel for funeral services, a mortuary and associated car parking. In 2023 a "burial wall" was added to the Cemetery site, adding to the existing built-form. We therefore assert that this separate 'sub-designation' of Site 3 is unjustified.

2. Boundary Treatment
In Planning policy for traveller sites[3] Clause 27(d) local authorities are required "not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community".

Site 3 is directly adjacent to the A10, a busy dual-carriageway trunk road which carries a substantial amount of traffic. The A10 is connected to the A406 North Circular Road to the south and the M25 London Orbital Motorway to the north.

Significant work on the site boundary will be needed to ensure that traffic noise is reduced for the site occupants, and this is unjustified in the light of [3].27.d.

3. Lack of transport modelling
The only references to transport modelling applies to intra-site movements, for example the Site Considerations in the Traveller Local Plan Regulation 19 Submission Plan [4], page 36.

It is unjustified to submit a site adjacent to a busy trunk road without considering the impact on the trunk road from vehicles entering or leaving the site.

4. Relocation of the Skate Park is out-of-policy
Document [4] recognises the loss of the skate park (para 5.20, page 26) and suggests that "it is understood" that this work is outside of the Traveller Local Plan Policy.

The Consultation Statement [5], page 17 addresses this point and says that a consultation is underway "directly with the skating community". This is unjustified. The TLP Policy should specify how this loss will be replaced.

5. Policy omits definition of "transit"

The Site is described as a “transit site” [4], para 4.15, page 20, but there is no reference in [4] Policy TLP1 or TLP2 (or anywhere else in [4]) to a maximum duration of stay at Site 3. Without this it is unjustified to describe the site as “transit”. Evidence is further contained in the Gypsy and Traveller Accommodation Needs Assessment 2020[6] Stakeholder Consultation, para 6.10, bulletpoint 4, page 29, where one respondent said “clearly there is a risk that temporary sites could be used on a more permanent basis”.

6. Comments on Policy wording TLP2

TLP2 Clause 8 calls for “utilise and enhance existing boundaries (where feasible) and avoid any new boundary treatment”. This is clearly not possible on the A10 sites which lies very close to the A10.

TLP2 is unclear if the “utility building with W/C, utility room, kitchen and living room” applies to each transit pitch or the site as a whole.

References

[1] https://www.enfield.gov.uk/__data/assets/pdf_file/0030/54678/Green-belt-and-MOLassessment-2023-Stage-3-LUC-Planning.pdf
[2] https://www.enfield.gov.uk/__data/assets/pdf_file/0014/103262/TLP-Site-Selection-Topic-Paper-September-2025-Planning.pdf
[3] https://www.gov.uk/government/publications/planning-policy-for-traveller-sites
[4] https://www.enfield.gov.uk/__data/assets/pdf_file/0016/103363/Traveller-local-plan-reg-19-submission-plan-Planning.pdf
[5] https://www.enfield.gov.uk/__data/assets/pdf_file/0013/103360/Traveller-local-plan-reg-18-part-2-consultation-statement-Planning.pdf

All page numbers, where given, refer to PDF page numbers and not document folios.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Site 3 should be removed from the Plan to make it sound.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-131 (1 of 2).pdf
2. TLP19-131 (1 of 2).pdf

TLP19- 132 - Lucinder Turner

Respondent: Lucinder TurnerGreater London Authority

Submission Number:132

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Consultation on Traveller Local Plan – Regulation 19
Thank you for consulting the Mayor of London on the London Borough of Enfield (LBE) draft Traveller Local Plan Regulation 19 document. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has also provided comments on the Regulation 19 document, which I endorse, and are attached at Annex 1.

The Mayor provided comments on the earlier LBE draft Traveller Local Plan (Regulation 18) on 4 November 2024 (ref. LDF10/LDD02/LP01/KG01). This letter follows on from that earlier advice and should be read alongside the Mayor's previous response.

General
London Plan (LP2021) Policy H14 requires boroughs to actively plan for Gypsy and Travellers' accommodation needs. The draft LBE Traveller Local Plan proposes to make provision for at least 30 permanent pitches over the plan period, including 20 permanent pitches during the five years,

and a transit site for at least 15 caravans. The Mayor welcomes the positive approach being taken by LBE to meet identified need. As currently drafted it is the Mayor's opinion that the LBE Regulation 19 Traveller Local Plan is in general conformity with the London Plan.

LBE Gypsy and Traveller Accommodation Needs Assessment (GTANA)
LP2021 Policy H14C requires boroughs that have undertaken a needs assessment since 2008 to update this as part of their Development Plan review process. The LBE GTANA was first published in 2020, and subsequently updated in May 2024 to inform the Regulation 18 consultation on the Traveller Local Plan. In alignment with LP2021 requirements, it identifies the scale and type of need for Traveller pitches in Enfield, including short-term (five years) and longer-term requirements.

The LBE GTANA identifies a need for 30 permanent pitches and one transit site for at least 15 caravans in the plan period up to 2041. The need for permanent pitches is disaggregated as 20 pitches in the first five years of the plan following adoption and 10 pitches in the longer-term. No need for additional Travelling Showperson plots in the borough has been identified. The need identified in the LBE GTANA is expected to broadly align with the level of need for Enfield in the emerging London-wide GTANA, and this is acknowledged in the draft Plan which is welcomed.

LBE does not currently have a Traveller Local Plan. The draft Enfield Local Plan is currently at examination and, when submitted in August 2024, identified a need for 21 pitches over the plan period (based on the 2020 GTANA) but did not identify specific sites. Subsequently as part of the examination of the draft ELP, it is noted that LBE have proposed a modification to the draft Enfield Local Plan to reflect the findings of the May 2024 GTANA.

Sites Proposed for Allocation (Policy TLP1)
By setting out needs up to 2041 and proposing allocations for two permanent sites and one transit site to meet these needs it is considered that the draft Plan is consistent with LP2021 Policy H14A. This requires boroughs to plan to meet the identified need for permanent Gypsy and Traveller pitches and include ten-year pitch targets in their Development Plan Documents.

We note several new or updated reports have been published alongside the Regulation 19 document, including a Green Belt Exceptional Circumstances Topic Paper (September 2025) and Site Selection Topic Paper (August 2025). The Exceptional Circumstances Topic Paper concludes that a lack of suitable alternative sites, the need for a five year supply of deliverable sites, and the small size of the sites justifies Green Belt/Metropolitan Open Land (MOL) release.

We recognise LBE has sought to identify sites from several sources following multiple calls for sites and through a reassessment of sites in its HELAA, and that all neighbouring authorities have confirmed that they are unable to help meet Enfield's identified Gypsy and Traveller accommodation needs. The Site Selection Topic Paper provides the requested clarity on the accessibility of the proposed allocations to facilities and sustainable transport.

The three sites proposed for allocation in the draft Plan to ensure a 5-year supply of deliverable sites are the same as those included in the Regulation 18 consultation, however the capacity of Site 2 (Land adjacent to the Ridgeway) has a reduced capacity of 12 permanent pitches, and the boundary of Site 3 (Land at A10) has been enlarged to include the existing Edmonton Skate Park. The reasons for these changes are set out in the Capacity Assessment (August 2025). Paragraph 4.14.6 of the LP2021 emphasises the importance of pitch and site layouts being accessible and adaptable, and it is acknowledged that these changes will enable this and the requirements of draft Policy TLP2 to be more readily achieved. We would suggest that further clarity is provided regarding the relocation of the existing skate park.

Part 4 of draft Policy TLP1 sets out that the longer term need for permanent pitches (in the period 2032/22 – 2040/41) will be met within either the Chase Park or Crews Hill placemaking area, and that the masterplans for these areas must each include a site for 10 permanent pitches with the Council deciding on which area will deliver the permanent pitch requirement. This is a change from the Regulation 18 consultation, which indicated that the areas would only be considered if sufficient pitch provision did not come forward elsewhere, due to the reduced capacity now proposed at Site 2 (Land adjacent to the
Ridgeway).

While the Mayor supports the principle of provision of pitches in the Placemaking Areas to meet longer term needs, it is recognised that this is dependent on the outcome of the draft Enfield Local Plan examination. Given the scale of the anticipated longer-term growth in the placemaking areas and that no other suitable sites have been found, we suggest that both areas be considered for accommodating pitches. This would ensure that there is appropriate flexibility within the Plan to accommodate any new evidence, and that meeting the longerterm needs of Gypsies and Travellers is not constrained by an approach which supports housing in both placemaking areas but limits pitch provision to just one area. For consistency with Part 2 of draft Policy TLP1 and supporting paragraph 4.19, the requirement for the placemaking areas should be expressed as a minimum.

Design (Policy TLP2)
The Mayor welcomes the updates to draft Policy TLP2 which incorporate the amendments requested in our Regulation 18 response. As the location of new pitches within the large placemaking areas is not yet known, we consider it would be beneficial to amend the supporting text to Policy TLP2 to emphasise the importance of also engaging the Gypsy and Traveller community in the initial masterplanning process. This will help ensure new sites are appropriately located within placemaking areas to facilitate access to local services.

Next steps
I hope these comments help positively inform the ongoing preparation of LBE's draft Traveller Local Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact REDACTED

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP 19-132.pdf

3 Enfield's Traveller Needs

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan

A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

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Policy TLP1 Sites for Travellers

Comment Number: 3

Which document or part of the document are you commenting on?

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Part 4 of draft Policy TLP1 sets out that the longer term need for permanent pitches (in the period 2032/22 – 2040/41) will be met within either the Chase Park or Crews Hill placemaking area, and that the masterplans for these areas must each include a site for 10 permanent pitches with the Council deciding on which area will deliver the permanent pitch requirement. This is a change from the Regulation 18 consultation, which indicated that the areas would only be considered if sufficient pitch provision did not come forward elsewhere, due to the reduced capacity now proposed at Site 2 (Land adjacent to the
Ridgeway).

While the Mayor supports the principle of provision of pitches in the Placemaking Areas to meet longer term needs, it is recognised that this is dependent on the outcome of the draft Enfield Local Plan examination. Given the scale of the anticipated longer-term growth in the placemaking areas and that no other suitable sites have been found, we suggest that both areas be considered for accommodating pitches. This would ensure that there is appropriate flexibility within the Plan to accommodate any new evidence, and that meeting the longerterm needs of Gypsies and Travellers is not constrained by an approach which supports housing in both placemaking areas but limits pitch provision to just one area. For consistency with Part 2 of draft Policy TLP1 and supporting paragraph 4.19, the requirement for the placemaking areas should be expressed as a minimum.

Design (Policy TLP2)
The Mayor welcomes the updates to draft Policy TLP2 which incorporate the amendments requested in our Regulation 18 response. As the location of new pitches within the large placemaking areas is not yet known, we consider it would be beneficial to amend the supporting text to Policy TLP2 to emphasise the importance of also engaging the Gypsy and Traveller community in the initial masterplanning process. This will help ensure new sites are appropriately located within placemaking areas to facilitate access to local services.

Next steps
I hope these comments help positively inform the ongoing preparation of LBE's draft Traveller Local Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact REDACTED

Policy TLP2 Design and Site Layout

Comment Number: 4

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(4)(a) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Consultation on Traveller Local Plan – Regulation 19
Thank you for consulting the Mayor of London on the London Borough of Enfield (LBE) draft Traveller Local Plan Regulation 19 document. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) has also provided comments on the Regulation 19 document, which I endorse, and are attached at Annex 1.

The Mayor provided comments on the earlier LBE draft Traveller Local Plan (Regulation 18) on 4 November 2024 (ref. LDF10/LDD02/LP01/KG01). This letter follows on from that earlier advice and should be read alongside the Mayor's previous response.

General
London Plan (LP2021) Policy H14 requires boroughs to actively plan for Gypsy and Travellers' accommodation needs. The draft LBE Traveller Local Plan proposes to make provision for at least 30 permanent pitches over the plan period, including 20 permanent pitches during the five years, and a transit site for at least 15 caravans. The Mayor welcomes the positive approach being taken by LBE to meet identified need. As currently drafted it is the Mayor's opinion that the LBE Regulation 19 Traveller Local Plan is in general conformity with the London Plan.

LBE Gypsy and Traveller Accommodation Needs Assessment (GTANA)
LP2021 Policy H14C requires boroughs that have undertaken a needs assessment since 2008 to update this as part of their Development Plan review process. The LBE GTANA was first published in 2020, and subsequently updated in May 2024 to inform the Regulation 18 consultation on the Traveller Local Plan. In alignment with LP2021 requirements, it identifies the scale and type of need for Traveller pitches in Enfield, including short-term (five years) and longer-term requirements.

The LBE GTANA identifies a need for 30 permanent pitches and one transit site for at least 15 caravans in the plan period up to 2041. The need for permanent pitches is disaggregated as 20 pitches in the first five years of the plan following adoption and 10 pitches in the longer-term. No need for additional Travelling Showperson plots in the borough has been identified. The need identified in the LBE GTANA is expected to broadly align with the level of need for Enfield in the emerging London-wide GTANA, and this is acknowledged in the draft Plan which is welcomed.

LBE does not currently have a Traveller Local Plan. The draft Enfield Local Plan is currently at examination and, when submitted in August 2024, identified a need for 21 pitches over the plan period (based on the 2020 GTANA) but did not identify specific sites. Subsequently as part of the examination of the draft ELP, it is noted that LBE have proposed a modification to the draft Enfield Local Plan to reflect the findings of the May 2024 GTANA.

Sites Proposed for Allocation (Policy TLP1)

By setting out needs up to 2041 and proposing allocations for two permanent sites and one transit site to meet these needs it is considered that the draft Plan is consistent with LP2021 Policy H14A. This requires boroughs to plan to meet the identified need for permanent Gypsy and Traveller pitches and include ten-year pitch targets in their Development Plan Documents.

We note several new or updated reports have been published alongside the Regulation 19 document, including a Green Belt Exceptional Circumstances Topic Paper (September 2025) and Site Selection Topic Paper (August 2025). The Exceptional Circumstances Topic Paper concludes that a lack of suitable alternative sites, the need for a five year supply of deliverable sites, and the small size of the sites justifies Green Belt/Metropolitan Open Land (MOL) release.

We recognise LBE has sought to identify sites from several sources following multiple calls for sites and through a reassessment of sites in its HELAA, and that all neighbouring authorities have confirmed that they are unable to help meet Enfield's identified Gypsy and Traveller accommodation needs. The Site Selection Topic Paper provides the requested clarity on the accessibility of the proposed allocations to facilities and sustainable transport.

The three sites proposed for allocation in the draft Plan to ensure a 5-year supply of deliverable sites are the same as those included in the Regulation 18 consultation, however the capacity of Site 2 (Land adjacent to the Ridgeway) has a reduced capacity of 12 permanent pitches, and the boundary of Site 3 (Land at A10) has been enlarged to include the existing Edmonton Skate Park. The reasons for these changes are set out in the Capacity Assessment (August 2025). Paragraph 4.14.6 of the LP2021 emphasises the importance of pitch and site layouts being accessible and adaptable, and it is acknowledged that these changes will enable this and the requirements of draft Policy TLP2 to be more readily achieved. We would suggest that further clarity is provided regarding the relocation of the existing skate park.

Part 4 of draft Policy TLP1 sets out that the longer term need for permanent pitches (in the period 2032/22 – 2040/41) will be met within either the Chase Park or Crews Hill placemaking area, and that the masterplans for these areas must each include a site for 10 permanent pitches with the Council deciding on which area will deliver the permanent pitch requirement. This is a change from the Regulation 18 consultation, which indicated that the areas would only be considered if sufficient pitch provision did not come forward elsewhere, due to the reduced capacity now proposed at Site 2 (Land adjacent to the
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While the Mayor supports the principle of provision of pitches in the Placemaking Areas to meet longer term needs, it is recognised that this is dependent on the outcome of the draft Enfield Local Plan examination. Given the scale of the anticipated longer-term growth in the placemaking areas and that no other suitable sites have been found, we suggest that both areas be considered for accommodating pitches. This would ensure that there is appropriate flexibility within the Plan to accommodate any new evidence, and that meeting the longerterm needs of Gypsies and Travellers is not constrained by an approach which supports housing in both placemaking areas but limits pitch provision to just one area. For consistency with Part 2 of draft Policy TLP1 and supporting paragraph 4.19, the requirement for the placemaking areas should be expressed as a minimum.

Design (Policy TLP2)
The Mayor welcomes the updates to draft Policy TLP2 which incorporate the amendments requested in our Regulation 18 response. As the location of new pitches within the large placemaking areas is not yet known, we consider it would be beneficial to amend the supporting

text to Policy TLP2 to emphasise the importance of also engaging the Gypsy and Traveller community in the initial masterplanning process. This will help ensure new sites are appropriately located within placemaking areas to facilitate access to local services.

Next steps

I hope these comments help positively inform the ongoing preparation of LBE's draft Traveller Local Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact REDACTED

TLP19- 133 - Patricia Charleton

Respondent: **Patricia CharletonTransport for London**

Submission Number:133

Submission Date:12/11/2025 09:00 GMT

4 Site Allocations

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Thank you for giving TfL the opportunity to comment on the Traveller Local Plan.

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments submitted as part of the Regulation 18 consultation on 4 November 2024 still hold. We are still concerned that the sites that have been identified are on the whole very isolated, not just in transport terms but in respect of any social infrastructure, eg schools, shops or other services. It is not clear how access to services including transport has been taken into account in the site selection process.

We have updated the information on Bulls Cross Nursery, Bulls Cross (TLP_01) site to further illustrate the point on the Regulation 18 comments. We hope you will take these and our previous comments into account in finalising the plan.

Appendix A: Detailed comments on specific sites
Site: Bulls Cross Nursery, Bulls Cross (TLP_01)

Regulation 18 comments: This is in an isolated rural location, at least 20 minutes from the nearest bus stop across the A10, sporadic footways, nearest primary school 10 minutes to the north at Capel Manor, but not walkable. No other facilities nearby.

Regulation 19 comments: This is in a relatively isolated rural location, its more than 600 metres from the nearest bus stop located on the A10, access to the southbound stop is via subway, footways are narrow and missing in places, nearest primary schools are 10 minutes (circa 700 metres) to the north at Capel Manor, and Forty Hill, 500 metres to the south. The nearest secondary schools are Lee Valley Academy, access via A10 bus stops or 1.5 kilometre walk, and Ignatius Academy (boys, Catholic), 700 metres to the south. Nearest retail centre and rail station is Turkey Street (London Overground), circa 1 kilometre to the east.

Site: Land adjacent to Ridgeway (TLP_03)

Regulation 18 comments: This is in a very isolated rural area, with no facilities within walking distance although there is a bus service along The Ridgeway.

Regulation 19 comments: Reg 18 comment still applies

Site: Chase Park (TLP_10)

Regulation 18 comments: This could potentially cover a large area, much of which currently has poor access to local services and transport. On Enfield Road to the south there are bus services providing access to Oakwood station to the west, a local shopping parade and primary schools.

Regulation 19 comments: Reg 18 comment still applies

Site: Crews Hill (TLP_11)

Regulation 18 comments: This could potentially cover a large area, much of which has poor access to local services and transport. Parts of the area would have access to Crews Hill rail station and an infrequent bus service.

Regulation 19 comments: Reg 18 comment still applies

Site: Land at A10 (TLP_9)

Regulation 18 comments: This is a suburban location, close to some facilities including primary school. Local bus services are available on the A10 corridor and on Church Street.

Regulation 19 comments: Reg 18 comment still applies

Bulls Cross Nursery (Site 1)

Comment Number: 4

Which document or part of the document are you commenting on?

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Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

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Thank you for giving TfL the opportunity to comment on the Traveller Local Plan.

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area.

The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments submitted as part of the Regulation 18 consultation on 4 November 2024 still hold. We are still concerned that the sites that have been identified are on the whole very isolated, not just in transport terms but in respect of any social infrastructure, eg schools, shops or other services. It is not clear how access to services including transport has been taken into account in the site selection process.

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Appendix A: Detailed comments on specific sites
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schools are Lee Valley Academy, access via A10 bus stops or 1.5 kilometre walk, and Ignatius Academy (boys, Catholic), 700 metres to the south. Nearest retail centre and rail station is Turkey Street (London Overground), circa 1 kilometre to the east.

Site: Land adjacent to Ridgeway (TLP_03)

Regulation 18 comments: This is in a very isolated rural area, with no facilities within walking distance although there is a bus service along The Ridgeway.

Regulation 19 comments: Reg 18 comment still applies

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Regulation 19 comments: Reg 18 comment still applies

Site: Crews Hill (TLP_11)

Regulation 18 comments: This could potentially cover a large area, much of which has poor access to local services and transport. Parts of the area would have access to Crews Hill rail station and an infrequent bus
service.

Regulation 19 comments: Reg 18 comment still applies

Site: Land at A10 (TLP_9)

Regulation 18 comments: This is a suburban location, close to some facilities including primary school. Local bus services are available on the A10 corridor and on Church Street.

Regulation 19 comments: Reg 18 comment still applies

Land adjacent to Ridgeway (Site 2)

Comment Number: 6

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
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A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

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The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments submitted as part of the Regulation 18 consultation on 4 November 2024 still hold. We are still concerned that the sites that have been identified are on the whole very isolated, not just in transport terms but in respect of any social infrastructure, eg schools, shops or other services. It is not clear how access to services including transport has been taken into account in the site selection process.

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Site: Crews Hill (TLP_11)

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Regulation 19 comments: Reg 18 comment still applies

Site: Land at A10 (TLP_9)

Regulation 18 comments: This is a suburban location, close to some facilities including primary school. Local bus services are available on the A10 corridor and on Church Street.

Regulation 19 comments: Reg 18 comment still applies

Land at A10 (Site 3)

Comment Number: 7

Which document or part of the document are you commenting on?

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A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

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The London Plan was published in March 2021. Local plan policies and site allocations should be developed in line with relevant London Plan policy which supports the implementation of the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy

Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments submitted as part of the Regulation 18 consultation on 4 November 2024 still hold. We are still concerned that the sites that have been identified are on the whole very isolated, not just in transport terms but in respect of any social infrastructure, eg schools, shops or other services. It is not clear how access to services including transport has been taken into account in the site selection process.

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Regulation 19 comments: Reg 18 comment still applies

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Site: Land at A10 (TLP_9)

Regulation 18 comments: This is a suburban location, close to some facilities including primary school. Local bus services are available on the A10 corridor and on Church Street.

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Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-133.pdf

Chase Park and Crews Hill

Comment Number: 5

Which document or part of the document are you commenting on?

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A particular section of the Traveller Local Plan
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Our comments submitted as part of the Regulation 18 consultation on 4 November 2024 still hold. We are still concerned that the sites that have been identified are on the whole very isolated, not just in transport terms but in respect of any social infrastructure, eg schools, shops or other services. It is not clear how access to services including transport has been taken into account in the site selection process.

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Regulation 19 comments: Reg 18 comment still applies

Site: Land at A10 (TLP_9)

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Regulation 19 comments: Reg 18 comment still applies

TLP19- 134 - Lesley Stenhouse

Respondent: **Lesley StenhouseEssex County Council**

Submission Number:134

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section number: Sections 1, 2, 5 and Appendix A, Paragraph(s): 1.5, 2.2-2.5, 5.1 and Appendix A

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Thank you for your letter and email of 25th September 2025 informing Essex County Council of the above Traveller Local Plan (TLP) consultation and asking if ECC's position has changed in being able to assist Enfield Council in meeting your identified accommodation needs under the Duty to Co-operate (DTC).

ECC's response to the DTC request and comments on the TLP consultation are set out below and in the attached response form.

1. Duty to Co-operate – ECC's position to assist Enfield Council meeting identified need
I can confirm that ECC's position has not changed from our previous responses dated 11th November 2023, 4th November 2004 and 19th February 2025.

To clarify, whilst ECC is a neighbouring authority, ECC is not the statutory body or neighbouring local planning authority with responsibility for housing and planning provision for the provision of pitches for the gypsy and traveller community, and we are not preparing any local plans for that purpose. In accordance with the Housing and Planning Act 2016, this is a matter for the Essex borough, city and district councils within the two-tier area of Essex (and respective unitary authorities of Southend City Council and Thurrock Council). It will be necessary to engage with these councils directly, noting Epping Forest District Council is a direct neighbouring authority.

ECC recognise that the London Borough of Enfield is the responsible body with the statutory housing and planning duties to provide for gypsy and travellers, and we would anticipate that your council would seek to plan to meet the need identified in your Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment (the evidence) in conformity with national planning policy.

As stated above, ECC is not the statutory body responsible for this provision and we are not in a position to assist Enfield in meeting any of its potential un-met gypsy and traveller requirements. We recommend that this question is directed to the relevant responsible authorities for housing and planning provision within Essex.

ECC can advise that whilst we operate the Essex Countywide Traveller Unit (ECTU) this is a partnership of ECC, local Essex councils, Essex Fire and Rescue Service and Essex Police. Together, we support Gypsies and Travellers to access services, including:
• supporting children into school and further education
• health services
• site and home fire safety visits

We manage unauthorised encampments on ECTU partner land and the 12 local authority sites approved for Gypsies and Travellers. On this basis neither ECC or the ECTU have a role to plan to provide, deliver (manage and operate) new sites, which is a matter for the respective Local Planning Authority to address.

2. ECC response to the TLP Regulation 19 consultation September 2025
Please find attached a response form, seeking changes to reflect the Traveller Local Plan (and the evidence) to ensure consistency with Planning Policy for Travellers Sites December 2024, noting for example the further changes to the definition of Gypsies and Travellers (see Annex 1).

Proforma submission

The Traveller Local Plan Regulation 19 (TLP) and the supporting evidence of the Gypsy and Traveller Accommodation Need Assessment Update (2024) (GTANA) and the GTANA Technical Note April 2025 do not appear to have been updated to ensure consistency with Planning Policy for Traveller Sites December 2024 (PPTS 2024), which replaced the December 2023 version.

ECC would have anticipated the Traveller Local Plan to be updated to reflect and align with PPTS 2024, including changes in the requirements and terminology, instead of referring to the requirements of PPTS December 2023. For example, PPTS 2024 includes further changes in the definition for "gypsies and travellers" Annex 1 Glossary, which has been changed to read as follows with the additional text underlined:

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, and all other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

It is unclear if or how the TLP reflects and is consistent with the PPTS 2024 and the TLP should be updated to clearly reflect the PPTS 2024 and changes and requirements.

For example it is noted that:

- Paragraph 1.5 bullet 1 – is the only reference to PPTS 2024
- Section 2 (Policy and Evidence)
  Paragraphs 2.2 – 2.5 are based on the PPTS December 2023 version and definition for Gypsy and Traveller's, with no update to reflect PPTS 2024 Annex 1 Glossary
- Section 5 (Design of New Traveller Sites)
  Paragraph 5.1 incorrectly refers to paragraph 26 of PPTS regarding site design, however Paragraph 26 of PPTS 2024 concerns the location of gypsy and traveller sites in the countryside
- Appendix A – gypsy and traveller definition – the definition is based on the PPTS December 2023

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To update the Traveller Local Plan Regulation 19 and GTANA evidence to refer to and reflect the requirements set out in the Planning Policy for Traveller sites December 2024.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-134 main.pdf

TLP19- 135 - Ligia Marcela Davis

Respondent: Ligia Marcela Davis

Submission Number:135

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Having considering the council's proposals for a traveller site on the Bulls Cross nursery site as well as the extensive report from the Forty Hall and Bulls Cross study group,I am convinced that the local on is utterly inadequate. As a result, I strongly disagree with the proposal and request that the council withdraw it.

it would be wrong to create a traveller's site in a conservation area so close to Middelton House and gardens. The site is too small and too narrow for the purpose while the entrance off the narrow Bulls Crossword be difficult and hazardous, both for the travellers vehicles and for other traffic, particularly at busy times in the morning and afternoon and early evening when the road is very busy. Also, access to local shops and other services is not easy or straight forward.

I am convinced that acquiring this site would result in the removal or endangerment of a significant number of trees, birds and animals which would be a significant loss for a part of the green belt.

For these reasons I strongly object to the proposal and support the detailed submission made by Forty Hall and Bulls Cross Study Group.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-135.pdf

TLP19- 136 - Mr & Mrs Collins

Respondent: Mr & Mrs Collins

Submission Number:136

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We wish to log our disapproval to your proposed traveller site for site number 3 Edmonton a10 skatepark access ,and site being too close to residential areas this land is protected as metropolitan open land and has always been recreational for local residents and a plan is in place to improve the skateboard site turning the toilet block into a cafe and changing rooms far more beneficial for our young people keeping them off the streets out of trouble , this is what the local people want ,why don’t you ask what they want.

This land does not belong to you but the people so please do something worthwhile for a change and let us applaud you and remember you for something good

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-136.pdf

TLP19- 137 - Holloway & Keown

Respondent: Holloway & Keown

Submission Number:137

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We wish to object to the proposed allocation TLP_01 - Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. We believe the allocation of this site is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with National Policy.

Our reasons are as follows:

1. Green Belt and Local Open Space:

The Bulls Cross site lies wholly in the green belt and designated Local Open Space. The council needs to demonstrate exceptional circumstances or a robust Green Belt assessment, which it has not. In fact, the Sustainability Appraisal identifies “significant negative” effects from loss of recreation/open space.

2. Heritage and Conservation
Heritage considerations were omitted in early site screening. No consideration has been considered. This is despite the site adjoining Grade II listed buildings and wall. It lies opposite Middleton House which is a Grade II Registered Park & Garden within the Forty Hall Conservation Area. It is an Archaelogical Priority Area. The omissions undermine transparency and soundness (NPPF para 31). The proposed active street frontage is a prime example of causing severe harm within the Conservation area and Heritage assets.

3. Soundness and Process:
Separating the Traveller Plan from the emerging Local Plan fragments the housing strategy. It fails NPPF paras 15, 31 and 62. There is no justification for needing small sites like Bulls Cross in the Councils strategic case. The evidence base is inconsistent and questions how much engagement with the Traveller communities when the site screening and selection took place. Consultation is part of the National Planning Policy.

Other less constrained sites could meet the Boroughs need and there is a need to revisit across the Borough. The major redevelopments highlighted recently and under consideration in the draft Enfield LP, if approved, could solve the process for all proposed fragmented sites.

4. Deliverability and Fire Safety.
The Councils spacial analysis assessment is flawed. Professional site planning would halve the actual number of deliverables being quoted, thus rendering the proposed Bulls Cross site untenable. This takes into account the sites narrow shape, access and tree restraints. Independent fire risk assessment deems the site unsafe due to the Fire Safety guidance relating to effective buildable area of 0.16 hectares falling well below the minimum requirement of 0.3 hectares. Fire Safety guidance also highlighted an unsafe fire risk due to the extensive tree line and canopy due to the narrowness of the site.

5. Trees, Ecology and Root Protection
Numerous category A&B trees would be lost or compromised, causing damage to biodiversity, visual harm and adverse impact on the deciduous woodland habitat, Conservation Area, Green Belt, local open space and Listed assets. The development would encroach on root protection areas contrary to British Standards and best practice guildance. The Biodiversity Net Gain (BNG) for all major and minor developments are required to provide a BNG of 10%, no evidence that this has been considered. Protected Species survey of site, not evident either.

6. Access and Sustainability
The site access fails the 30mph sightline standards and is impracticable for towing vehicles or fire engines. This conflicts with the Highways design standards and the TLPs own layout requirements. The site is isolated from the main road (A10) and access would be via Bulls Cross. The whole of the Bulls Cross area is consistently congested and gridlocked. Additional traffic would only add to this issue.

Conclusion

TLP_01 is not positively prepared, justified, effective or consistent with National Policy. It should be removed from the Traveller Local Plan. The Council should reassess the need and re run the site search and undertake full technical appraisals for shortlisted sites. The TLP should be considered with the Councils full building plans and not in isolation, or fragmented site isolation. They should engage meaningfully at an early stage with communities and stakeholders.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-137.pdf

TLP19- 138 - Molly Johnstone

Respondent: Molly Johnstone

Submission Number:138

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to respond to the consultation for the proposed travellers' site on The Ridgeway.
I would strongly like to object to the proposal for the following reasons:

- This is Greenbelt Land that should be preserved.
- There is already heavy traffic on The Ridgeway and this would increase it substantially causing road safety concerns.
- There would be a huge impact on the immediate local community. At present there are only 5 houses here but the proposal is for 12 traveller families which would change the nature of the community disproportionally.
- Wildlife and environmental impact would be negative and high.

I appreciate you listening to my concerns.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-138.pdf

TLP19- 139 - Jan Cunningham

Respondent: Jan Cunningham

Submission Number:139

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Traveller Local Plan for land adjacent to The Ridgeway.

To whom it may concern, after looking at your plans i would like to object to your proposed plans.

1, This site is wholly inappropriate due to being on green belt land when it is clear there are better locations.

2, Depending on which papers you read there are proposed 10/12 families to be living there, some read as many as 20 or 22 pitches!! Either would not be suitable for this tiny existing residential site and even if it was the minimum this would completely dominate the surrounding 4 family homes, I believe this is not in keeping with the guidelines set out by the council itself.

I wish you luck in finding these travellers the perfect site, but this most definitely isnt the one.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-139.pdf

TLP19- 140 - Hilary Griffin

Respondent: Hilary Griffin

Submission Number:140

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to comment on the proposed Traveller Site adjacent to the Ridgeway.

I am concerned that this will cause extra traffic on the Ridgeway, it is a fast road 50mph limit, there is a bus stop which school children use near, this could be dangerous for them, and there is a turning right near this bus stop which makes it even more dangerous. There is no cycle lane and cyclists would also be in more danger from the traffic. There is a lack of utlity's in the area, which would cost a lot of money to make happen, who would pay for this.

I do hope you will find a more suitable place for the traveler's.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-140.pdf

TLP19- 141 - Anita Salvi

Respondent: Anita Salvi

Submission Number:141

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

The Plan Reg 19 / site entrance is not justified as the plan does not take into account sufficient evidence about road safety risks on the A10. The proposed plan will worsen existing safety problems by increasing traffic volumes or access points. The site 3 entrance is situated just after the designated bus stop, whilst a bus pulls into this stop drivers behind are not able to see if there are any vehicles cars or caravans pulling out at the designated entrance straight onto the A10. This is not only putting lives at risks for drivers on the A10 but also the gypsies/travellers and their families who will be using the site! Has the council consulted Transport for London if this is legally compliant with road safety action plans and strategic road network requirements? I do feel that this is not legally compliant. There is no filter lane here.

The A10 has a long history of serious and fatal collisions. Speeding, poor crossings and inadequate junction design create danger for pedestrians, cyclists, and motorists. Any new development for this traveller site route will only increase traffic movements, turning conflicts and pedestrian risk.

I strongly object to the Enfield local plan regulation 19 on the grounds that it fails to adequately address serious and ongoing road safety issues along the A10. The A10 is already one of the most dangerous roads in the borough!

This plan proposes additional development and increased traffic along this route without sufficient evidence of how safety will be improved or mitigated. This is not justified by available evidence provided. The councils evidence does not demonstrate how the plan will achieve measurable safety improvements, nor does it incorporate commitments from Transport for London to redesign dangerous junctions. Refuge van collections, deliveries, Caravans pulling in & out of the skate park onto the A10 will cause havoc.

There is also Edmonton Cemetery well-being to consider, how will this impact on the public visiting their loved ones graves with the site of a traveller camp all around?

During funerals taking place, noise & increase traffic so near the cemetery?

I strongly object to the proposed closure of the skate park which serves as a vital community facility for children and young people in Enfield.

The skate park provides a safe, space for exercise, socialising developing positive habits. Closing it would remove on the of few free recreational spaces available to young people in our area, pushing them onto streets or unsafe spaces instead! This contradicts the National planning policy framework which promotes healthy and safe communities. The Enfield Local plan objectives to enhance youth provision and active lifestyles. Have the council engaged with local users, parents and schools to discuss this further?

Also the plans showed cutting down trees and taking out green spaces for our community. Increasing pollution.

I would like to be fully kept up to date with any future meetings or decisions.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-141.pdf

TLP19- 142 - David O'Brien

Respondent: David O'BrienOld Ignatian Association

Submission Number:142

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Written Representations

The Old Ignatian Association write to submit written representations to the London Borough of Enfield (LBE) Traveller Local Plan (TLP) Proposed Submission Draft. These representations specifically relate to the proposed allocation for permanent traveller pitch provision at Bulls Cross Nursery ('the Site') which is directly adjacent to the Old Ignatian Headquarters at The Loyola Ground, on Turkey Street.

The Old Ignatian Association previously submitted representations to the Traveller Local Plan (Regulation 18) Issues and Options consultation in November 2024.

This written submission to the Regulation 19 consultation addresses matters of soundness in accordance with Paragraph 36 of the National Planning Policy Framework (NPPF).

Old Ignatian Association

The Old Ignatian Association was established to serve the interests of former pupils of St. Ignatius College by providing social, spiritual and sporting facilities. The Association allows past students to maintain relationships with both the college and with other alumni.

The Old Ignatian Association has been in existence for many years. However, its profile changed dramatically in the early 1960's after a dedicated group oversaw the acquisition of a sports ground in Woodford. A pavilion was built, and the facilities included three football and three ruby pitches as well as a cricket square. With a new headquarters the Association flourished. Unfortunately, in the early 1970's the ground was compulsorily purchased to make way for the M11 making the Association homeless! For a few years in the late 1970's we used Woodcroft, a small sports ground in Winchmore Hill, but that proved to be unsuitable and again we were homeless.

In the years since the Old Ignatian's left Woodford it has been difficult for the Association to offer any focus for its activities other than through sport. For a long time, to their credit, the football, rugby and cricket clubs managed to survive without a permanent base and continued to flourish in difficult circumstances.

In 1999 the Association purchased the former Belling sports ground in Turkey Street, Enfield with the intention of building a new headquarters for the Association in the Enfield area. The new home for the Old Ignatian's, The Loyola Ground, was completed in April 2008 and consists of a bar, a large function area, a kitchen and a football pitch with changing and showering facilities. Having dedicated years and considerable investment to establish The Loyola Ground as the Headquarters for the Old Ignatian Association, this vital facility is the social centre of the Old Ignatian's, providing not just a sports pavilion for adults and children, but also caters for the requirements of Old Ignatian's who are not necessarily sports minded. The facility encourages Old Ignatian's back to the Association as well as attracting current pupils. The school have already made use of our facilities on numerous occasions for both sporting and social events.

As an adjacent community asset to the Site, the Old Ignatian Association are disappointed that we have not been directly consulted on the proposals for Gypsy and Traveller pitches at the Bulls Cross site. This letter sets out our strong objection to the proposed permanent Gypsy and Traveller Site at Bulls Cross.

Response to the Proposed Traveller Local Plan Submission Draft

These written representations are accompanied by the completed Regulation 19 Representations Form. The following sections of this submission seek to address the relevant questions as set out in the Representations Form.

Which document or part or the document are you commenting on?
This written representation is made in relation to the Bulls Cross Nursery (Site 1).

On what basis are we objecting to the Enfield's Traveller Local Plan:
This written representation is submitted on the basis that we do not consider the Draft TravellerLocal Plan to be "sound".

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why:
In respect of Paragraph 36 of the NPPF (2024) which sets out the tests of soundness in examining local plans, it is considered that the current drafting of the Draft Traveller Plan is unsound on the basis of the following tests:

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.

The modification we seek to the TLP is the removal of the Bulls Cross Nursery (Site 1) proposed allocation. For the reasons set out in the remainder of this submission, we do not consider the proposed allocation is 'Justified' or 'consistent with national policy', and should be removed from the TLP.

Justified:
We do not consider the TLP is 'Justified' on the basis that development of the Bulls Cross Nursery Site for permanent traveller pitch provision would not comply with ELP Policy H10: Traveller Accomodation, and accordingly, cannot be an 'appropriate strategy'.

As set out in our written representations for the Regulation 18 consultation, we reaffirm our considerations for why the Site at Bulls Cross is not appropriate for the use of permanent Traveller pitch provision when assessed against the Council's Policy H10 traveller site requirements:

The site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;

- The Site is not allocated for residential development in the Adopted Local Plan or the emerging Draft New Local Plan and therefore has not previously been considered appropriate for residential accommodation.
- The Site has a PTAL score of 0, representing the least accessible location. The score of 0 demonstrates that the Site has very limited public transport infrastructure available and is not suitable for residential development.

The site provides convenient access to health care, retail and education school facilities with available capacity;

- The Site is located in a low-density residential area with limited local schools, health care and retail provision.

The impact of the development would not harm the landscape, heritage assets, biodiversity or visual character and amenity of the area, particularly the green belt;

- The Site is not previously developed land, and development of the Site would inevitably result in adverse harm to the landscape and biodiversity.
- The development of the Site would inevitably require the clearance of mature trees and shrubs, particularly given the existing narrow access route into the Site, the widening of which would require the removal of mature trees.
- The Site is located within the Forty Hall Conservation Area and is located in close proximity to two Listed Buildings at the corner of Bulls Cross and Turkey Street, in addition to four Listed Buildings within the grounds of Myddelton House opposite the Site.
- The Council's Adopted and emerging New Local Plan both seek to pro-actively preserve and enhance all of the Borough's heritage assets, including Conservation Area and Listed Buildings. Core Policy 31 of the Adopted Local Plan sets out that the Council will ensure new development have regard to the special character of heritage assets. In addition, draft Policy DE10 of the emerging New Local Plan seeks to preserve and enhance such heritage assets, including the impact of the proposals on the significance of the heritage assets and their setting. It is not considered that provision of a Site for traveller caravans will either preserve or enhance the heritage assets of the Conservation Area or nearby Listed Buildings and their settings.
- The Site is located within the Green Belt where development is considered inappropriate.
- This letter goes on to further assess the proposed development against the harm to the Green Belt.

The site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;

- The Site is not Previously Developed Land and not designated as an employment site in the Adopted Local Plan or the emerging Draft New Local Plan and therefore has not previously been considered appropriate for employment activities.
- Given the Site location, directly adjacent to the Loyola playing fields where football and Gaelic matches are facilitated all year round, including a programme for children's matches all weekend, we have significant concerns as to the potential nature of occupants' employment and entrepreneurial activities which may be noisy and disruptive to the sporting activities of the Old Ignatian's Headquarters.

The site can be safely accessed by pedestrians, caravans and other vehicles;

- Bulls Cross is a narrow B Road, within limited pedestrian pavement. Access to the Site is narrow, with no adequate provision for turning or servicing. We therefore have considerable concerns for pedestrian safety along this stretch of road and the adverse impact of the increase in vehicle movements, including lorries to service the Site, provide waste management, and through the movement of traveller caravans and vehicles.

The layout and boundary treatments of the development aim positively integrate with the adjacent townscape/ communities;

- There is limited detail provided in TLP proposed Bulls Cross Nursery Site Allocation as to the layout or boundary treatment of the Site, we therefore have concerns as to the impact of the Site on the activities and security of the Old Ignatian's Loyola Ground.
- The draft TLP sets out that the Site would provide 8 permanent pitches. The Site is very small, measuring just 0.5ha. We consider the provision of 8 permanent pitches, comprising an unknown number of individuals, at the Site to be overdevelopment. We have significant

concerns over how the number of travellers at the Site is to be controlled.

The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.

- The Site is not previously developed land and has no existing utilities on site.

Consistent with national policy:

The proposed traveller site allocation at Bulls Cross Nursery (Site 1) is located within the designated Green Belt.

Since the submisison of our Regulation 18 written representations to the Traveller Local Plan in November 2024, the Government adopted the revised NPPF (December 2024). This section assesses the proposed Bulls Cross allocation against the latest NPPF in respect of the national Green Belt policy.

Paragraph 143 of the NPPF, clearly states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

Paragraph 153 of the NPPF confirms that inappropriate development should not be approved except in very special circumstances. Inappropriate development is defined as development not falling within the exceptions to development in the Green Belt as set out in paragraphs 154 and 155.

Paragraph 154 relates to the construction of new buildings in the Green Belt and defines various forms of development as not being inappropriate.

Paragraph 155 relates to the development of homes, commercial uses and other forms of development in the Green Belt. It includes a set of criteria whereby such development is not considered inappropriate development in the Green Belt. The first test that must be adhered to is:

"The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

When considering national planning policy on Green Belt land, the Council's proposal for a traveller site allocation at the Bulls Cross Nursery is not consistent.

Firstly, it is not considered that the development of the Site for permanent traveller pitch provision falls into any of the exceptions listed at Paragraph 154 of the NPPF. As such the development for permanent traveller pitches at the Site would be inappropriate in the Green Belt.

Secondly, when assessing the Site against the second set of possible exceptions to building in the Green Belt, as set out at Paragraph 155, the Site is not Grey Belt land. This is clear when considering the definition of Grey Belt land, which the NPPF confirms as "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. *'Grey belt'*:

Against the Grey Belt definition, the Site at Bulls Cross Nursery is not:
a) previously developed land; and
b) The Site does "strongly" contribute to both purposes (a) and (d) of Green Belt, as assessed in the Council's own Green Belt Assessment against the purposes of the Green Belt.

Summary
For the reasons set out in these written representations, it is considered that the TLP is not 'Sound' on the basis that:

- The TLP is not 'Justified' for failure of the proposed Bull Cross Nursery allocation to comply with ELP Policy H10, setting out the requirements for traveller sites; and
- The TLP is not consistent with national policy in that the development of the Site at Bulls Cross Nursery does not meet any of the NPPF's exceptions for development in the Green Belt, and therefore the provision of permanent pitches at this Site would be considered inappropriate development in the Green Belt.

It is for these reasons that we **strongly object** to the Traveller Local Plan.

We trust that the information provided will be considered as part of the consultation process on the Traveller Local Plan and look forward to receiving confirmation that this representation has been received.

The Old Ignatian Association wishes to contribute towards any future stages of the LBE's Traveller Local Plan and therefore would be grateful if the Council could advise of further opportunities for participation on the examination hearing sessions.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to separate written representations letter.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We are the adjacent landowners and valued community asset. We are disappointed that we have not been directly consulted on the proposals Traveller pitches at the Bulls Cross site previously given. Given the impact the proposed allocation will have on the Old Ignatian Association we consider it necessary to participate in the hearing sessions.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-142 form.pdf
2. TLP19-142.pdf

TLP19- 143 - St John's Prep and Senior School

Respondent: **Philip Freeman-BentleyHGH Consulting**

On-behalf of: St John's Prep and Senior School

Submission Number:143

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to accompanying representation document

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to accompanying representation document

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying representation document

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to accompanying representation document, which raises issues that should be considered further at examination.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-143 - Final.pdf
2. TLP19-143 Form details.pdf
3. TLP19-143 Appendix 1 - Site Assessment Matrix_r.pdf
4. TLP19-143 Appendix 2 - Landscape and Visual Impact Report_r.pdf
5. TLP19-143 Appendix 3 - Transport Report.pdf
6. TLP19-143 Appendix 4 - Ecological Report.pdf

7. TLP19-143 Appendix 5 - Noise Report.pdf
8. TLP19-143 Appendix 6a - Official Copy Register.pdf
9. TLP19-143 Appendix 6b - Official Copy Title Plan.pdf
10. TLP19-143 Appendix 6c - Official Copy Conveyance.pdf
11. TLP19-143.pdf

4 Site Allocations

Comment Number: 4

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to accompanying representation document

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to accompanying representation document

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying representation document

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to accompanying representation document, which raises issues that should be considered further at examination.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan

A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to accompanying representation document

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to accompanying representation document

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to accompanying representation document

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please refer to accompanying representation document, which raises issues that should be considered further at examination.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
* Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

TLP19- 144 - Kai Mithell

Respondent: Kai MithellEnvironment Agency

Submission Number:144

Submission Date:12/11/2025 09:00 GMT

Policy TLP2 Design and Site Layout

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Policy TLP2 Design and Site Layout

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Thank you for consulting us on the latest iteration of your Traveller local plan. We have reviewed the document. submitted and are pleased to see that our previous comments and wording have been taken into consideration.

It is good to see the three permanent site allocations are located outside of the flood plain. For those to be allocated through future masterplans on the Cruise hill and Chase Park areas we would expect a flood risk sequential approach to be taken to ensure they too are not at risk from fluvial flooding.

Policy TLP2
I note the inclusion of environmental considerations, where the protection of biodiversity assets is raised, which is good. However, there is only mention of mitigation for surface water flooding. Currently this is fine as no sites are at risk from fluvial flooding but should plots in Cruise Hill or Chase Park be at risk following their designation it would be good to have fluvial flood risk added into this policy to ensure it is suitably futureproofed.

Final Comments

Thank you again for seeking our representation on the Draft Traveller Local Plan Regulation 19 consultation. We trust that the comments presented in this letter are clear and informative. Please do not hesitate to contact me if you have any queries.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-144 main.pdf
2. TLP19-144.pdf

TLP19- 145 - Sharon Jenkins

Respondent: Sharon JenkinsNatural England

Submission Number:145

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the Proposed Submission of the Traveller Local Plan for Enfield London Borough Council.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-145.pdf

TLP19- 146 - Neeru Kareer

Respondent: Neeru KareerLondon Borough of Barnet

Submission Number:146

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 2

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

London Borough of Barnet (LBB) welcomes the opportunity to provide written representations on Enfield's Regulation 19 Traveller Local Plan. The Councils supports Enfield's cooperative approach on site allocations for pitches to meet the accommodation needs for the Gypsies and Travellers community given the cross-boundary nature of the area. We have reviewed the draft Traveller Local Plan (TLP), together with the methodology and evidence based used to undertake the Councils own Gypsy and Traveller Accommodation Needs Assessment (GTANA), as detailed with the Enfield's Integrated Impact Assessment, a supporting document which informs the draft TLP. In addition, LB Barnet have reviewed the Capacity Study (August 2025), which illustrates the potential capacity of identified sites to deliver Traveller pitches and transit provision. Our comments are set out below.

Draft Traveller Local Plan (TLP)
Enfield is not seeking pitch provision from Barnet. The draft plan aims to meet its own accommodation needs for Gypsies and Travellers through the provision and delivery of:
• 20 pitches for a five-year supply, to be delivered by 2032
• 10 additional pitches for long-term needs to 2041.
• 1 transit site for at least 15 caravans.

In the Planning Policy for Traveller Sites (PPTS), published by the Department for Levelling Up, Housing and Communities (DLUHC) in December 2024, the term "pitch" is used to describe accommodation for Gypsies and Travellers, as distinct from a "plot" which is used for Travelling

Showpeople. A pitch space is typically designed for single family occupation. ThE draft TLP defines pitch as “land on a Gypsy/Traveller site occupied by one resident family”, which aligns with the PPTS.

LBB seeks further clarification on what LB Enfield would consider to appropriate definition of a “one family” or a “single family” occupation for the purposes of the draft TLP. We of course acknowledge that this should be made clearer at a national level by the DLUHC, and at regional level by the Greater London Authority (GLA).

Nevertheless, in the absence of a precise definition, our understanding of what is clearly meant by single-family occupation remains ambiguous, and therefore it is difficult to provide comprehensive comments without understanding the likely increase in population arising from each site allocation. For example, a family could mean a parent(s) and their children only; or it could mean extended family or multi general family. In both instances, the population generated would differ significantly, which in turn would have distinctly separate implications on planning policy. LB Enfield should consider including indicative occupancy number for each site allocation in the final TLP.

For future planning applications to deliver pitches for travellers, It will be necessary to understand the estimated number of people which would likely occupy the proposed allocations to enable consultees to comprehensively assess the population increase arising from each site allocation, and its impact on infrastructure, traffic, and service demand on schools and health care facilities near the borough boundary shared with Barnet.

Site Allocations
LB Barnet welcomes Enfield’s proactive approach producing a standalone Traveller Local Plan and does not formally object to the specific site allocations. The methodology and evidence based used to both identity and justify the proposed 3 site allocations (all owned by Enfield Council) in the draft TLP appears to be broadly acceptable. Further, Policy TLP1 (Sites for Travellers) in Enfield Reg 19 Local Plan notes that the same sites allocations for Travellers would meet the identified shortfall and ensure a 5-year supply of deliverable sites, which LBB supports.
• **Site 1- Bulls Cross Nursery, EN1 4RJ** - Provision and delivery of 8 permanent Pitches (located approximately 1.5 to 2 miles from the nearest boundary with the LB Barnet) &
• **Site 2- Land adjacent to Ridgeway EN2 8AE** Provision and delivery of 12 permanent Pitches (located approximately 0.5 to 1 mile from the shared boundary with LBB)

The above sites are in areas that are not at risk of flooding and have adequate access to public transport and community facilities, including schools and health centres, which in principle should be considered favourably. Site 1 includes 16 parking spaces; and Site 2 provides for 24 parking spaces. As such, development on both sites would have localised impacts on traffic. LB Barnet may experience minor to moderate impacts arising from cross boundary movements on the local highway.

The draft TLP does not include projections regarding the anticipated number of occupants onsite, although the IIP, which supports the draft TLP, concludes that there are unlikely to be any “significant” cross boundary environmental or infrastructure impacts on LBB. Notwithstanding, based on the number and size of caravans illustrated in the indicative layout plans for both sites within the Capacity Study, and LB Barnet’s associated assumptions derived from our own research regarding the likely population yield per pitch, Bulls Cross Nursery site has the potential to accommodate approximately 96-144 individuals; and The

Ridgeway site is estimated to support a population of approximately 144 to 216. Development on both sites would therefore have impacts on cross boundary social infrastructure such as schools, health and social care facilities. As such, we would welcome acknowledgement and commentary on the likely population yield arising from both site allocations within the final TLP.

Both sites are located within the Green Belt land which could raise concerns on compliance with London Plan and national policy. However, this is a matter for the GLA to comment on further, mindful that changes to the position at a national and regional level, regarding development on the Greenbelt are likely imminent.

LB Barnet request to be formally consulted on any future proposed development onsite.

• **Site 3: Land at A10, Edmonton N21 2PS** Transit Pitches to accommodate for a minimum of 15 caravans

The Capacity Study asserts the site has capacity for a minimum 16 caravans, whilst the draft TLP identifies a minimum of 15 caravans onsite. This discrepancy may need to be rectified in the final TLP.

The draft TLP states that: "This small parcel of land will need to be de-designated from the Boroughs MOL area, to meet the need for a transit site". Further information on the proposed de-designation process for this site should be provided in the final TLP.

Population projections on the likely numbers of occupants onsite are not detailed within the draft TLP or Capacity Study. Nevertheless, based on the number and size of caravans illustrated in the indicative layout plan for the site in the Capacity Study (but for 15 rather than 16 pitches), and LB Barnet's associated assumptions regarding the likely population yield per pitch, the overall site is estimated to support a population of approximately between 90-150 people at any given time.

Each pitch provides 2 parking spaces, and therefore the site allocation proposes 30 spaces in total. Consequently, development onsite would have localised impact on the local highway, in addition to impacts on social infrastructure, including schools and health care facilities. It is therefore recommended that the final TLP explicitly consider and address the anticipated population yield associated with this site.

On balance, given the site is located approximately 2.5-3 miles from the shared boundary with LBB, the site allocation is unlikely to result in direct cross-boundary impacts on the borough. LB Barnet acknowledges the strategic value of this allocation and its potential to reduce unauthorised encampments in neighbouring areas, including Barnet, by providing a formal stopping place for transient Traveller communities.

Any future proposal for the development of this site should carefully assess its potential impact on Metropolitan Open Land (MOL), as well as consider issues related to pollution, access, and safety, given its immediate proximity to the A10

Potential Site allocations at Chase Park and Crews Hill - located 1.5 to 2 miles, and 1 to 1.5 miles respectively from the shared boundary with LBB The draft TLP states "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").

LBB request to be consulted on any further details regarding potential site allocations for pitches in the future.

Upcoming GLA GTANA

Enfield's Traveller Needs Technical Note acknowledges that whilst Enfield's draft TLP is based on its own local GTANA, it acknowledges the GLA's London-wide assessment. The draft GLA GTANA identifies a need for Enfield to deliver 25 pitches by 2032. This differs from the overall pitch requirements from Gypsy and Traveller accommodation set out in Enfield's draft TPA, which identifies a need for 20 pitches to be delivered by 2025. However, in addition to this, the draft TPA proposes to deliver 10 further permanent pitches between 3032-31. Moreover, to accommodate for Transit need, the plan proposes to allocate least one site to accommodate a minimum of 15 caravans. Whilst this approach should broadly be looked upon favourably, the methodologies applied, and subsequent figures reached regarding the need for pitches should be a matter for discussion with the GLA as part of this Reg 19 consultation process.

Early-stage Review of Barnet Local Plan (adopted in March 2025)
LB Barnet is committed to an early-stage review of our Local Plan, commencing in 2026. Policy HOU 06: (Gypsies, Travellers and Travelling Showpeople) of the Local Plan identifies no objectively assessed need for pitches for Gypsies and Travellers. This strategic policy will be reevaluated as part of the review process, at which point, LBB would welcome an opportunity to discuss with LB Enfield the methodology and evidence based used their own GTANA to inform Enfield's draft TLP. We recognise the value on early engagement to discuss shared evidence base to identity; assess and plan for Traveller accommodation needs,
including pitches which have cross boundary implications.

The upcoming GLA GTANA, due to be adopted and published by the end of this year, will also be considered as part of the review process for policy HOU06. Additionally, the new draft London Plan is due to be published in the coming months. The direction and guidance arising from the GLA, will influence how Barnet plans to deliver on future need for pitches in the Borough.

Moving forward
Overall, LBB supports Enfield's proactive approach producing a standalone Traveller Local Plans and does not object to the proposed site allocations in principle. The adoption and implementation of TLP in due course provides a positive mechanism to further promote and increase integration between the Traveller Communities and the settled communities.

Site allocations at Bulls Cross Nursery and Land adjacent to Ridgeway may have indirect or direct impacts on Barnet, particularly in terms of the currently unknown population increase and its potential impact cross-boundary movement and shared services. This matter should be further addressed in the final TLP. The site allocation on land by the A10 for transit pitches is welcomed as it intends to reduce unauthorised encampments and improve site provision.

We continue our commitment to further engagement and look forward to working with London Borough of Enfield on strategic matters that cross administrative boundaries.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-146 main -.pdf
2. TLP19-146.pdf

3 Enfield's Traveller Needs

Comment Number: 8

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

London Borough of Barnet (LBB) welcomes the opportunity to provide written representations on Enfield's Regulation 19 Traveller Local Plan. The Councils supports Enfield's cooperative approach on site allocations for pitches to meet the accommodation needs for the Gypsies and Travellers community given the cross-boundary nature of the area. We have reviewed the draft Traveller Local Plan (TLP), together with the methodology and evidence based used to undertake the Councils own Gypsy and Traveller Accommodation Needs Assessment (GTANA), as detailed with the Enfield's Integrated Impact Assessment, a supporting document which informs the draft TLP. In addition, LB Barnet have reviewed the Capacity Study (August 2025), which illustrates the potential capacity of identified sites to deliver Traveller pitches and transit provision. Our comments are set out below.

Draft Traveller Local Plan (TLP)
Enfield is not seeking pitch provision from Barnet. The draft plan aims to meet its own accommodation needs for Gypsies and Travellers through the provision and delivery of:
• 20 pitches for a five-year supply, to be delivered by 2032
• 10 additional pitches for long-term needs to 2041.
• 1 transit site for at least 15 caravans.

In the Planning Policy for Traveller Sites (PPTS), published by the Department for Levelling Up, Housing and Communities (DLUHC) in December 2024, the term "pitch" is used to describe accommodation for Gypsies and Travellers, as distinct from a "plot" which is used for Travelling Showpeople. A pitch space is typically designed for single family occupation. ThE draft TLP defines pitch as "land on a Gypsy/Traveller site occupied by one resident family", which aligns with the PPTS.

LBB seeks further clarification on what LB Enfield would consider to appropriate definition of a "one family" or a "single family" occupation for the purposes of the draft TLP. We of course acknowledge that this should be made clearer at a national level by the DLUHC, and at regional level by the Greater London Authority (GLA).

Nevertheless, in the absence of a precise definition, our understanding of what is clearly meant by single-family occupation remains ambiguous, and therefore it is difficult to provide comprehensive comments without understanding the likely increase in population arising from

each site allocation. For example, a family could mean a parent(s) and their children only; or it could mean extended family or multi general family. In both instances, the population generated would differ significantly, which in turn would have distinctly separate implications on planning policy. LB Enfield should consider including indicative occupancy number for each site allocation in the final TLP.

For future planning applications to deliver pitches for travellers, It will be necessary to understand the estimated number of people which would likely occupy the proposed allocations to enable consultees to comprehensively assess the population increase arising from each site allocation, and its impact on infrastructure, traffic, and service demand on schools and health care facilities near the borough boundary shared with Barnet.

Site Allocations
LB Barnet welcomes Enfield's proactive approach producing a standalone Traveller Local Plan and does not formally object to the specific site allocations. The methodology and evidence based used to both identity and justify the proposed 3 site allocations (all owned by Enfield Council) in the draft TLP appears to be broadly acceptable. Further, Policy TLP1 (Sites for Travellers) in Enfield Reg 19 Local Plan notes that the same sites allocations for Travellers would meet the identified shortfall and ensure a 5-year supply of deliverable sites, which LBB supports.
• **Site 1- Bulls Cross Nursery, EN1 4RJ** - Provision and delivery of 8 permanent Pitches (located approximately 1.5 to 2 miles from the nearest boundary with the LB Barnet) &
• **Site 2- Land adjacent to Ridgeway EN2 8AE** Provision and delivery of 12 permanent Pitches (located approximately 0.5 to 1 mile from the shared boundary with LBB)

The above sites are in areas that are not at risk of flooding and have adequate access to public transport and community facilities, including schools and health centres, which in principle should be considered favourably. Site 1 includes 16 parking spaces; and Site 2 provides for 24 parking spaces. As such, development on both sites would have localised impacts on traffic. LB Barnet may experience minor to moderate impacts arising from cross boundary movements on the local highway.

The draft TLP does not include projections regarding the anticipated number of occupants onsite, although the IIP, which supports the draft TLP, concludes that there are unlikely to be any "significant" cross boundary environmental or infrastructure impacts on LBB. Notwithstanding, based on the number and size of caravans illustrated in the indicative layout plans for both sites within the Capacity Study, and LB Barnet's associated assumptions derived from our own research regarding the likely population yield per pitch, Bulls Cross Nursery site has the potential to accommodate approximately 96-144 individuals; and The
Ridgeway site is estimated to support a population of approximately 144 to 216. Development on both sites would therefore have impacts on cross boundary social infrastructure such as schools, health and social care facilities. As such, we would welcome acknowledgement and commentary on the likely population yield arising from both site allocations within the final TLP.

Both sites are located within the Green Belt land which could raise concerns on compliance with London Plan and national policy. However, this is a matter for the GLA to comment on further, mindful that changes to the position at a national and regional level, regarding development on the Greenbelt are likely imminent.

LB Barnet request to be formally consulted on any future proposed development onsite.

• **Site 3: Land at A10, Edmonton N21 2PS** Transit Pitches to accommodate for a minimum of 15 caravans

The Capacity Study asserts the site has capacity for a minimum 16 caravans, whilst the draft TLP identifies a minimum of 15 caravans onsite. This discrepancy may need to be rectified in the final TLP.

The draft TLP states that: “This small parcel of land will need to be de-designated from the Boroughs MOL area, to meet the need for a transit site”. Further information on the proposed de-designation process for this site should be provided in the final TLP.

Population projections on the likely numbers of occupants onsite are not detailed within the draft TLP or Capacity Study. Nevertheless, based on the number and size of caravans illustrated in the indicative layout plan for the site in the Capacity Study (but for 15 rather than 16 pitches), and LB Barnet’s associated assumptions regarding the likely population yield per pitch, the overall site is estimated to support a population of approximately between 90-150 people at any given time.

Each pitch provides 2 parking spaces, and therefore the site allocation proposes 30 spaces in total. Consequently, development onsite would have localised impact on the local highway, in addition to impacts on social infrastructure, including schools and health care facilities. It is therefore recommended that the final TLP explicitly consider and address the anticipated population yield associated with this site.

On balance, given the site is located approximately 2.5-3 miles from the shared boundary with LBB, the site allocation is unlikely to result in direct cross-boundary impacts on the borough. LB Barnet acknowledges the strategic value of this allocation and its potential to reduce unauthorised encampments in neighbouring areas, including Barnet, by providing a formal stopping place for transient Traveller communities.

Any future proposal for the development of this site should carefully assess its potential impact on Metropolitan Open Land (MOL), as well as consider issues related to pollution, access, and safety, given its immediate proximity to the A10

Potential Site allocations at Chase Park and Crews Hill - located 1.5 to 2 miles, and 1 to 1.5 miles respectively from the shared boundary with LBB The draft TLP states “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”).

LBB request to be consulted on any further details regarding potential site allocations for pitches in the future.

Upcoming GLA GTANA
Enfield’s Traveller Needs Technical Note acknowledges that whilst Enfield’s draft TLP is based on its own local GTANA, it acknowledges the GLA’s London-wide assessment. The draft GLA GTANA identifies a need for Enfield to deliver 25 pitches by 2032. This differs from the overall pitch requirements from Gypsy and Traveller accommodation set out in Enfield’s draft TPA, which identifies a need for 20 pitches to be delivered by 2025. However, in addition to this, the draft TPA proposes to deliver 10 further permanent pitches between 3032-31. Moreover, to accommodate for Transit need, the plan proposes to allocate least one site to accommodate a minimum of 15 caravans. Whilst this approach should broadly be looked upon favourably, the methodologies applied, and subsequent figures reached regarding the need for pitches should be a matter for discussion with the GLA as part of this Reg 19 consultation process.

Early-stage Review of Barnet Local Plan (adopted in March 2025)
LB Barnet is committed to an early-stage review of our Local Plan, commencing in 2026. Policy HOU 06: (Gypsies, Travellers and Travelling Showpeople) of the Local Plan identifies no objectively assessed need for pitches for Gypsies and Travellers. This strategic policy will be reevaluated as

part of the review process, at which point, LBB would welcome an opportunity to discuss with LB Enfield the methodology and evidence based used their own GTANA to inform Enfield's draft TLP. We recognise the value on early engagement to discuss shared evidence base to identity; assess and plan for Traveller accommodation needs,
including pitches which have cross boundary implications.

The upcoming GLA GTANA, due to be adopted and published by the end of this year, will also be considered as part of the review process for policy HOU06. Additionally, the new draft London Plan is due to be published in the coming months. The direction and guidance arising from the GLA, will influence how Barnet plans to deliver on future need for pitches in the Borough.

Moving forward
Overall, LBB supports Enfield's proactive approach producing a standalone Traveller Local Plans and does not object to the proposed site allocations in principle. The adoption and implementation of TLP in due course provides a positive mechanism to further promote and increase integration between the Traveller Communities and the settled communities.

Site allocations at Bulls Cross Nursery and Land adjacent to Ridgeway may have indirect or direct impacts on Barnet, particularly in terms of the currently unknown population increase and its potential impact cross-boundary movement and shared services. This matter should be further addressed in the final TLP. The site allocation on land by the A10 for transit pitches is welcomed as it intends to reduce unauthorised encampments and improve site provision.

We continue our commitment to further engagement and look forward to working with London Borough of Enfield on strategic matters that cross administrative boundaries.

4 Site Allocations

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

London Borough of Barnet (LBB) welcomes the opportunity to provide written representations on Enfield's Regulation 19 Traveller Local Plan. The Councils supports Enfield's cooperative approach on site allocations for pitches to meet the accommodation needs for the Gypsies and Travellers

community given the cross-boundary nature of the area. We have reviewed the draft Traveller Local Plan (TLP), together with the methodology and evidence based used to undertake the Councils own Gypsy and Traveller Accommodation Needs Assessment (GTANA), as detailed with the Enfield's Integrated Impact Assessment, a supporting document which informs the draft TLP. In addition, LB Barnet have reviewed the Capacity Study (August 2025), which illustrates the potential capacity of identified sites to deliver Traveller pitches and transit provision. Our comments are set out below.

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On balance, given the site is located approximately 2.5-3 miles from the shared boundary with LBB, the site allocation is unlikely to result in direct cross-boundary impacts on the borough. LB Barnet acknowledges the strategic value of this allocation and its potential to reduce unauthorised encampments in neighbouring areas, including Barnet, by providing a formal stopping place for transient Traveller communities.

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Bulls Cross Nursery (Site 1)

Comment Number: 4

Which document or part of the document are you commenting on?

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A particular section of the Traveller Local Plan
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Land adjacent to Ridgeway (Site 2)

Comment Number: 5

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole

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A particular section of the Traveller Local Plan
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• **Site 2- Land adjacent to Ridgeway EN2 8AE** Provision and delivery of 12 permanent Pitches (located approximately 0.5 to 1 mile from the shared boundary with LBB)

The above sites are in areas that are not at risk of flooding and have adequate access to public transport and community facilities, including schools and health centres, which in principle should be considered favourably. Site 1 includes 16 parking spaces; and Site 2 provides for 24 parking spaces. As such, development on both sites would have localised impacts on traffic. LB Barnet may experience minor to moderate impacts arising from cross boundary movements on the local highway.

The draft TLP does not include projections regarding the anticipated number of occupants onsite, although the IIP, which supports the draft TLP, concludes that there are unlikely to be any "significant" cross boundary environmental or infrastructure impacts on LBB. Notwithstanding, based on the number and size of caravans illustrated in the indicative layout plans for both sites within the Capacity Study, and LB Barnet's associated assumptions derived from our own research regarding the likely population yield per pitch, Bulls Cross Nursery site has the potential to accommodate approximately 96-144 individuals; and The
Ridgeway site is estimated to support a population of approximately 144 to 216. Development on both sites would therefore have impacts on cross boundary social infrastructure such as schools, health and social care facilities. As such, we would welcome acknowledgement and commentary on the likely population yield arising from both site allocations within the final TLP.

Both sites are located within the Green Belt land which could raise concerns on compliance with London Plan and national policy. However, this is a matter for the GLA to comment on further, mindful that changes to the position at a national and regional level, regarding development on the Greenbelt are likely imminent.

LB Barnet request to be formally consulted on any future proposed development onsite.

• **Site 3: Land at A10, Edmonton N21 2PS** Transit Pitches to accommodate for a minimum of 15 caravans

The Capacity Study asserts the site has capacity for a minimum 16 caravans, whilst the draft TLP identifies a minimum of 15 caravans onsite. This discrepancy may need to be rectified in the final TLP.

The draft TLP states that: “This small parcel of land will need to be de-designated from the Boroughs MOL area, to meet the need for a transit site”. Further information on the proposed de-designation process for this site should be provided in the final TLP.

Population projections on the likely numbers of occupants onsite are not detailed within the draft TLP or Capacity Study. Nevertheless, based on the number and size of caravans illustrated in the indicative layout plan for the site in the Capacity Study (but for 15 rather than 16 pitches), and LB Barnet’s associated assumptions regarding the likely population yield per pitch, the overall site is estimated to support a population of approximately between 90-150 people at any given time.

Each pitch provides 2 parking spaces, and therefore the site allocation proposes 30 spaces in total. Consequently, development onsite would have localised impact on the local highway, in addition to impacts on social infrastructure, including schools and health care facilities. It is therefore recommended that the final TLP explicitly consider and address the anticipated population yield associated with this site.

On balance, given the site is located approximately 2.5-3 miles from the shared boundary with LBB, the site allocation is unlikely to result in direct cross-boundary impacts on the borough. LB Barnet acknowledges the strategic value of this allocation and its potential to reduce unauthorised encampments in neighbouring areas, including Barnet, by providing a formal stopping place for transient Traveller communities.

Any future proposal for the development of this site should carefully assess its potential impact on Metropolitan Open Land (MOL), as well as consider issues related to pollution, access, and safety, given its immediate proximity to the A10

Potential Site allocations at Chase Park and Crews Hill - located 1.5 to 2 miles, and 1 to 1.5 miles respectively from the shared boundary with LBB The draft TLP states “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”).

LBB request to be consulted on any further details regarding potential site allocations for pitches in the future.

Upcoming GLA GTANA

Enfield’s Traveller Needs Technical Note acknowledges that whilst Enfield’s draft TLP is based on its own local GTANA, it acknowledges the GLA’s London-wide assessment. The draft GLA GTANA identifies a need for Enfield to deliver 25 pitches by 2032. This differs from the overall pitch requirements from Gypsy and Traveller accommodation set out in Enfield’s draft TPA, which identifies a need for 20 pitches to be delivered by 2025. However, in addition to this, the draft TPA proposes to deliver 10 further permanent pitches between 3032-31. Moreover, to accommodate for Transit need, the plan proposes to allocate least one site to accommodate a minimum of 15 caravans. Whilst this approach should broadly be looked upon favourably, the methodologies applied, and subsequent figures reached regarding the need for pitches should be a matter for discussion with the GLA as part of this Reg 19 consultation process.

Early-stage Review of Barnet Local Plan (adopted in March 2025)

LB Barnet is committed to an early-stage review of our Local Plan, commencing in 2026. Policy HOU 06: (Gypsies, Travellers and Travelling Showpeople) of the Local Plan identifies no objectively assessed need for pitches for Gypsies and Travellers. This strategic policy will be reevaluated as part of the review process, at which point, LBB would welcome an opportunity to discuss with LB

Enfield the methodology and evidence based used their own GTANA to inform Enfield's draft TLP. We recognise the value on early engagement to discuss shared evidence base to identity; assess and plan for Traveller accommodation needs,
including pitches which have cross boundary implications.

The upcoming GLA GTANA, due to be adopted and published by the end of this year, will also be considered as part of the review process for policy HOU06. Additionally, the new draft London Plan is due to be published in the coming months. The direction and guidance arising from the GLA, will influence how Barnet plans to deliver on future need for pitches in the Borough.

Moving forward
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Site allocations at Bulls Cross Nursery and Land adjacent to Ridgeway may have indirect or direct impacts on Barnet, particularly in terms of the currently unknown population increase and its potential impact cross-boundary movement and shared services. This matter should be further addressed in the final TLP. The site allocation on land by the A10 for transit pitches is welcomed as it intends to reduce unauthorised encampments and improve site provision.

We continue our commitment to further engagement and look forward to working with London Borough of Enfield on strategic matters that cross administrative boundaries.

Land at A10 (Site 3)

Comment Number: 6

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

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London Borough of Barnet (LBB) welcomes the opportunity to provide written representations on Enfield's Regulation 19 Traveller Local Plan. The Councils supports Enfield's cooperative approach on site allocations for pitches to meet the accommodation needs for the Gypsies and Travellers community given the cross-boundary nature of the area. We have reviewed the draft Traveller

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Chase Park and Crews Hill

Comment Number: 7

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TLP19- 147 - Louise McDonagh

Respondent: Louise McDonagh

Submission Number: 147

Submission Date: 12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

[redacted]

Amongst all the other concerns I wrote about previously, my main one is for the safety of the children getting on and o the bus at that triangle where the access to the site is proposed.
I travel up and down the Ridgeway daily, the road is very uneven and vehicles driving at 50mph is somewhat dangerous.

In addition, the council has a 10+ year agreement to landfill the site further along the Ridgeway with large Lorrie's with muck adding to the road traffic.
Please consider alternative sites in the borough as the posi on of this small site is inadequate.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-147.pdf

TLP19- 148 - Cllr James Hockney

Respondent: Cllr James HockneyCouncillor Enfield

Submission Number:148

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
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Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
* Not effective
Not consistent with national policy

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My objections to the inclusion of the A10 site as a transit site are as follows:
1. The site is inadequate to meet the minimum number of 15 caravans set out in the delivery requirements (Appendix B - Site 3). The average car and caravan is between 12 to 15ft and the lack of room to manoeuvre vehicles could lead to cars and caravans trying to reverse onto the A10. Given the travelling community may need to park their cars on the site as well suggests at best only 5 to 6 caravans could be accommodated comfortably.

2. Maintaining the pedestrian route across the site (which is a requirement set out in the design principles) as well planting a screen to the A10 will further impact the sites capacity.

3. The exceptional need to release this Metropolitan Open Land has not been established, when there are other sites such as Meridian Water which haven't been considered. Why haven't these more suitable sites been considered ?

4. The site plans do not appear to comply with the Communities and Local Government Good Practice Guide for Traveller Sites. In particular the following is not addressed adequately or at all. Indeed the site is too small to properly address some.

- Adequate access for emergency vehicles.
- The need for water drainage and storm water drainage
- The connection of pitches either to a sewage system or a septic tank
- Waste disposal facilities either for individual pitches or the site Accommodation for a site manager
- To ensure fire safety it is essential that every trailer, caravan or park home must be not less than 6 meters from any other trailer, caravan or park home that is occupied separately. Size of the site would make this difficult if more than a few pitches were planned.

The only access to the site is from the A10 a busy dual carriageway. The site is close to the junction of another busy main road, Church Street. It is difficult to see how caravans can manoeuvre safely onto this site. Have TfL been consulted and what is their view?

6. The Council has not provided any transport modelling to show how vehicles can safely access the site from the A10. On this ground alone inclusion of this site cannot be justified.

7. Loss of amenity. The skatepark is a much loved and well used sports facility used by many and especially younger residents. The Friends of the skatepark have plans and funding to enhance (now on hold depending on the Local Plan decision). Loss of the skatepark goes against Council policies to develop sport and play facilities. The document contains a vague promise to relocate but it is unclear where and how close to the existing site. Moving it too far away will mean existing local users will lose out.

I would also like to add concerns about how the consultation has been conducted by the Council.

1) The complexity of the form has been an issue raised by many residents. And raises the question of whether this has discouraged representations from residents.

2) The Council were not going to hold a consultation event in Bush Hill Park Ward. With the nearest location being in Enfield Town. Both Councillor Peter Fallart and myself had to complain to the Council before they agreed to hold an event in Bush Hill Park Ward. Only for it then to be held at 4-6pm – which would have prevented many that work from attending.

3) I understand that at the event they were insufficient consultation sheets to be given out to residents – and that Councillor Pat Gregory had to ask officers to print more.

4) Concern of predetermination. I have placed an FOI with the Council on whether any email discussions existed on relocating the Skatepark. It has emerged that there are over 400 email chains in a year on relocation.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The proposed site on the A10 is inadequate for the purpose and should be removed from the plan. Alternate sites should be considered such as Merdian Water. The current proposed site is Metropolitan Open Land.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As a local Councillor, within whose ward this proposed site is located, I would like to raise the inadequacies of the proposed site for a transit site, including road safety issues. In addition to the impact on the Skateboarding and BMX community in relation to the loss of the amenity.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-148 email.pdf
2. TLP19-148.pdf

TLP19- 149 - Nigel Walkden

Respondent: Nigel WalkdenNational Highways

Submission Number:149

Submission Date:12/11/2025 09:00 GMT

Policy TLP2 Design and Site Layout

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
* A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Policy TLP2

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

National Highways was appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We are specifically concerned with any proposals which have the potential to impact the M25 mainline between J24 and J25.

We have reviewed the Traveller Local Plan 2020 – 2041 Regulation 19 Submission Plan dated September 2025 which sets out the TLP aims and objectives, planning policy and evidence for the TLP, details of traveller needs within Enfield and finally the site allocations with design details for the new traveller sites. Map A shows the location of the allocated sites within the TLP. Site 1 at Bullscross Nursey and site 2 at the land adjacent to the Ridgeway are both proposed for permanent provision (within the first 5 years) for a minimum of eight pitches and 12 pitches, respectively. Site 3 at land at the A10 is proposed for transit provision with a minimum of 15 caravans.

We support Policy TLP2 Design and Site Layout which states that, among other things, planning applications for traveller sites will provide safe vehicle and pedestrian access from the site to the highway, and will explore opportunities to improve existing walking and cycling routes to encourage sustainable forms of travel.

We have no specific comments on any safeguarded site allocations at present; however, we note that several are in close proximity to the SRN. If the sites allocated to meet traveller needs come forward in these locations, it should be ensured that Transport Assessments, comprising an assessment of the impact on the SRN, are submitted alongside planning applications for all developments. Similarly, if any of these safeguarded sites are instead released for other forms of development, we would again expect an assessment of SRN impacts to be provided. It would be preferred that National Highways should be consulted at preapplication stage for these developments but, should this not happen, National Highways should be consulted as soon as these applications are submitted.

Based on our review of the Regulation 19 Submission Plan, we are satisfied that the Traveller Local Plan 2020 – 2041 would not affect the safety, reliability, and/or operation of the SRN (based the tests set out in DfT Circular 01/2022 and MHCLG NPPF 2024 [particularly paras 109 to 115]).

Thank you for consulting National Highways and we look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk.

TLP19- 150 - Catherine Mason

Respondent: Catherine MasonSavills
On-behalf of: Catherine MasonComer Homes Group

Submission Number:150

Submission Date:12/11/2025 09:00 GMT

Policy TLP1 Sites for Travellers

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Enfield Council's Traveller Local Plan – Regulation 19 Submission Plan
On behalf of our client Comer Homes Group, we write to submit representations in respect of the above.
Our client owns significant land at Vicarage Farm (part of the Chase Park Place Making area coming forward within the emerging Local Plan under Policy PL10).

In order to be found sound at Examination in Public, the policies in the draft Traveller Local Plan need to comply with the tests of soundness set out in paragraph 36 of the NPPF (December 2024, amended 2025). Therefore the plan must be:

- "a) 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;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) 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
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework." (author's emphasis underlined).

Policy TLP1 Sites for Travellers

Draft Policy TLP1 criterion 4 states that:
'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.'

We are concerned about this approach and do not think it is sound and is contrary to the tests set out within Paragraph 36 of the NPPF. It is neither justified or effective or consistent with national policy.

One of the core principles running through the NPPF is making efficient use of land in order to meet the identified need for different forms of housing (NPPF Paragraphs 129 and 130). For the reasons set out below
we are of the view that the Policy as drafted will not ensure efficient use of land and is therefore not justified, effective or consistent with national policy.

It is not appropriate for the longer-term need for additional pitches to be decided separately outside of the plan making process, where there will be no accountability or opportunity for discussion or input from third parties.

In terms of viability, there are still many unknowns in relation to the Chase Park allocation and these will not become completely clear until the masterplan and subsequent applications progress. Whilst, we are content overall that the development coming forward under the Chase Park allocation can be made to be viable (subject to density, design etc), this additional aspect has not been factored in at all. The Chase Park allocation already has to support a number of objectives, including 50% affordable housing, significant infrastructure costs and a primary school. We have significant concerns that any additional requirements might further affect viability and this has not been fully explored or tested at this stage. Therefore to state that either Chase Park or Crews Hill will meet the longer-term need for 10 permanent pitches is not justified or effective.

It is our view that it would be far better and make the plan much more robust (and sound) if the additional pitches could be accommodated within the existing proposed draft allocations at Site 1 (Bullscross Nursery) and Site 2 (Land adjacent to the Ridgeway) to ensure efficient use of space in line with policies in the NPPF as set out above. We do not think that there is adequate evidence to justify why these available sites could not accommodate a higher number of pitches. Whilst there is no current guidance on pitch design, the Government Guidance dated 2008 (Designing Gypsy and Traveller Sites Good Practice Guidance, now withdrawn) is generally accepted as a good starting point and has been used by Arc4 in their assessments on capacity.

In particular, we believe that Site 2 is capable of accommodating a much higher number of pitches. The site area is 1.09 ha, however, only 12 pitches are proposed which does not make efficient use of the site. On the basis of 0.0625 ha per pitch (as per assumption used in the capacity assessments), this site could accommodate at least 17 pitches. The developable area of the site shown is constrained as a large area of rewilding is included (as shown in the Capacity Assessment by Enfield Council dated 13.08.25) – there doesn't appear to be any need or justification for this and it dramatically reduces the developable area for pitches. We acknowledge that the site is

within the Green Belt (as is Bullscross Nursery where there is no re-wilding proposed) but this isn't key to the exceptional circumstances argument for release of the land from the Green Belt and it is important that the site is maximised to justify its removal.

Although a smaller site, we believe that Site 1 is also capable of accommodating additional pitches to ensure the site is maximised. It is our view that Sites 1 and 2 are capable of delivering the 30 pitches required to meet the identified need and we do not believe that there is adequate evidence to the contrary.

It is critical that Site Allocations 1 and 2 are maximised and make efficient use of land in line with the NPPF. This is even more important as these sites are proposed to be removed from the Green Belt and therefore the sites should be maximised in order to ensure that their removal is justified and worthwhile.

In summary, reference within the Traveller Local Plan to Crews Hill or Chase Park delivering the longer term need for pitches is unsound and we believe that the draft allocations are capable of delivering a greater number of pitches to meet the identified need.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-150 email.pdf
2. TLP19-150.pdf

TLP19- 151 - David & Janet Burrowes

Respondent: David & Janet Burrowes

Submission Number:151

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We write to make the following representations to Enfield Council's Traveller Local Plan (TLP). We live approximately 50 meters from the site TLP_01 (Bulls Cross Nursery) and therefore have a close interest and David Burrowes would wish to give oral evidence at the examination of the TLP.

Green Belt and Local Open Space

1. Failure to demonstrate site-specific exceptional circumstances (NPPF 145-147; PPTS policy)

The Topic Paper (Chapters 4-6) sets out a generic strategic case for Green Belt release (housing, employment, logistics), not a site-specific one. However, per NPPF paras 145-147 and PPTS paras 16-17, each site must have a fully evidenced local justification.

Objection: The Bulls Cross site's release lacks a distinct local case in either the Topic Paper or the Site Allocations evidence. Site specific issues have not been fully assessed - the 'active frontage' requires the removal of historical gates and numerous mature trees which would have a significant irreversible negative impact on the adjoining Listed wall, Grade II Myddelton House

wihtin 150m of the site (plus 3 other listed assets within 150m) and the CA as a whole. The effects to this specific site have not been sufficiently considered or any mitigating proposals demonstrated. Note, the existing screening from the public realm was used in the selection process of the site. No quantified assessment of Green Belt harm, openness, or alternative Traveller provision has been published - contrary to paragraph 145 of the NPPF ('fully evidenced and justified exceptional circumstances').

2. Material harm to openness and rural character not outweighed

The Topic Paper itself concedes that many Green Belt parcels contribute 'strongly' to Green Belt purposes and that harm is 'high or very high'. Bulls Cross sits outside the settlement boundary, forms part of a rural gap, and directly contributes to openness.

Objection: The Council's own evidence recognises this sensitivity, yet the site's release would erode the open setting between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Topic Paper gives no mitigation or compensatory Green Belt enhancement (required by NPPF paras 147-150)

3. Conflict with Sustainability Appraisal and absence of transparent balancing (NPPF para 31)

The Integrated Impact Assessment (IIA) identifies 'significant negative' environmental effects from the loss of open/recreations space, and the Council acknowledges these in the Topic Paper's sustainability analysis.

Objection: Failure to transparently reconcile a 'significant negative' SA score against Green Belt release undermines the Plan's soundness under NPPF para 31 (evidence proportionate and transparent). No explanation is given of how these adverse findings were outweighed.

4. Failure to give material weight to designated heritage assets (NPPF paras 199-208)

The Bulls Cross sites lies: Adjacent to Grade II Listed buildings and a historic boundary wall, opposite Myddelton House Gardens (Grad II Registered Park and Garden), within 250m of numerous listed assets, and within the Forty Hill Conservation Area and an Archaeological Priority Area.

The Topic Paper (see 3.24 bullet 4) acknowledges that Enfield's heritage constraints limit developability - yet these have not been applied consistently to Bulls Cross.

Objection: The failure to weigh heritage impacts as a material consideration renders the Plan unsound. The omission breaches - NPPF paras 199-208 (heritage significance and setting), NPPF para 31 (transparent evidence), and PPTS para 26 (site suitability respecting heritage and landscape).

5. Lack of plan-level consistency and breach of plan-making hierarchy

The Topic Paper (para 5.6) explicitly states that site-specific exceptional circumstances are contained in the Site Allocations Topic Paper, not the Exceptional Circumstances paper. Yet, no published extract provides a local justification for Bulls Cross. The Integrated Impact Assessment records 'significant negative effects' relating to loss of open space and recreation. The Topic Paper concedes that this parcel contributes strongly to Green Belt purposes and that resulting harm would be high or very high.

The Council has failed to take account of relevant case law and Inspectors decisions:

Ward (Basildon BC 2024) - Council has unduly relied upon generic need without demonstrating that Bulls Cross specific heritage, openness and SA harms are outweighed in establishing exceptional circumstances.

Delaney (Basildon BC 2013) - Council has failed to apply NPPS para. 146-147 properly to Bulls Cross with no site-specific exceptional circumstances.

Barnsley and Tandridge (2024/2025) - Council has failed to produce a NPPS para 155-style, site specific analysis for Bulls Cross (showing inter alia sustainability scoring, and openness/visual impact appraisal).

Objection: The Council has therefore not 'fully evidenced and justified' exceptional circumstances through the plan-making process, as required by PPTS para 10 and NPPF para 147. It follows that the site's designation is procedurally unsound under s.20 P and CPA 2004.

Heritage and Conservation

The site sits in a highly sensitive historic environment. adjoining two Grade II Listed buildings and a Grade II Listed wall, and opposite the Grade II Registered Park and Garden at Myddelton House. It also lies within the Forty Hall Conservation Area and an Archaeological Priority Area.

The Council's initial site profroma incorrectly recorded 'None' under heritage considerations - an omission later admitted and later corrected. The error materially undermines the validity of the site selection process. Development of the proposed scale and massing would remove historic gates, mature trees, and traditional railings, introducing visual harm to the setting of multiple heritage assets.

Objection: These impacts are contrary to NPPF paragraphs 199-208 and Local Plan Policy DMD44.

Fire Safety and Deliverability

Fire safety concerns are central to the site's deliverability and reference is made to the Forty Hall and Bulls Cross Study Group's commissioned professional assessment of unacceptable risk levels which identify fundamental safety failures:

- Extensive mature tree cover creates a continuous canopy, forming a bridging effect that allows fire to spread between caravans and through tree crowns.

- Protected trees prevents achieving the 6-metre separation between caravans and 3-metre boundary buffer required by BRE Fire Safety Guidance for Caravan and traveller sites.

- The single access point lacks sufficient width or turning radius for emergency vehicles and creates a serious obstruction risk in an emergency.

- The effective developable area reduces to approximately 0.16 hectares, below the Council's 0.3-hectare minimum threshold for Traveller site allocations under its 2024 methodology.

Objection: The omission of reference to fire risk, fire safety design standards, or emergency access assessment from the Integrated Impact Assessment is a serious procedural failure and makes the TLP unsound. A key part of these assessments, as reflected in other local authority IIAs, is to consider community safety and public health, which includes fire safety - a critical risk factor for Gypsy, and Traveller sites due to caravan spacing, fuel storage, and emergency access challenges, often in collaboration with local Fire and Rescue Services.

Trees, Ecology, and Priority Habitat

The site boundary comproses mature Catagory A and B trees forming part of a Deciduous Woodland Priority Habitat, with a Tree Preservation Order for all trees (except fruit trees) to the south of the site, and with all tree on and near the site under current TPO assessment by the Council.

The IIA recognises that these trees form a Priority Habitat as a Deciduous woodland and that the development must maximize the retention of existing trees and minimise he impact on retained trees, in additional to retaining and enhancing boundary planting.

Objection: Loss or incursion in the root protections zone of these trees would severely diminish biodiversity connectivity, visual screening, and heritage setting contrary to British Standards and best practice guidance making the TLP unsound.

Accessibility and Sustainability

The site's Public Transport Accessibility Level (PTAL) is 0, the lowest possible rating. There are no safe pedestrian routes or public transport options connecting the site to schools, health services, or employment areas.

Swept-path analysis by Forty Hall and Bulls Cross Study Groups demonstrated that large vehicles, including towed caravans and fire appliances, cannot safely enter or turn within the site, contrary to NPPF paragraphs 105, 110, 112 and London Plan Policy T2.

Additionally, Bulls Cross site was rejected during HELAA 2023 due to concerns about accessibility and isolation. Inclusion in the TLP is contrary or at lease inconsistent with the Council's Site Selection Topic Paper 3.20 which excluded rejected site within HELAA.

Objection: Inclusion of Bulls Cross site is contrary to NPPF paragraphs 105, 110, and 112 and London Plan Policy T2, LP21 and H14.

Plan-Making Process, Evidence Base and Alternatives

The Draft Traveller Local Plan has been prepared in isolation from the emerging Enfield Local Plan contrary to NPPF paragraphs 15 and 62, which require a holistic strategy for meeting all housing needs. The public and stakeholders have been disadvantaged form engaging fully on all issues arising from an integral local plan including a TLP.

The Topic Paper admits the Council relied heavily on two large allocations (Chase Park, Crews Hill) for strategic housing and logistic needs. It does not identify the need for small traveller allocations such as Bulls Cross within that strategic case.

Objection: Failure to prioritise more suitable alternatives breaches NPPF paragraph 146 and PPTS paragraph 10. The Council has not properly shown why Traveller needs cannot be met through:

- Previously developed or inset Green Belt sites, or other allocations in less sensitive locations, site turnover hasn't been given consideration of 20 period in relation to net gain in sites against overall need. It is not defensible to assume that because Enfield currently has zero authorised pitches,

- Future pitch turnover will also be zero (as noted in the 2020 GTANa).

-Less constrained sites (TLP_05 Comreddy Close, TLP_09 Skate Park. TLP_02 Durants Park Bowling Green and TLP_04 Hillyfields Depot and Land)

-the Boroughs's needs could be met more sustainably without Green Belt/open-space harm by including other sites in the emerging Local Plan.

Conclusions and Recommendations

In conclusion, the allocation of TLP_01 is unsound under the NPPF's four tests of soundness. The proposal conflicts with Green Belt, heritage, sustainability, and fire safety principles. The evidence base is outdated, incomplete, and procedurally flawed.

Recommendations:

-TLP_01 (Bulls Cross Nursery) be omitted from the Regulation 19 Traveller Local Plan;

-The Council re-run its site selection processed with updated, evidence-led assessments;

-Fire safety be formally included into all future Integrated Impact Assessments; and

-Traveller provision be planned coherently though the Enfield Local Plan for transparency and soundness

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Fire Safety and Deliverability

Objection: The omission of reference to fire risk, fire safety design standards, or emergency access assessment from the Integrated Impact Assessment is a serious procedural failure and makes the TLP unsound. A key part of these assessments, as reflected in other local authority IIAs, is to consider community safety and public health, which includes fire safety - a critical risk factor for Gypsy, and Traveller sites due to caravan spacing, fuel storage, and emergency access challenges, often in collaboration with local Fire and Rescue Services.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-151 main.pdf
2. TLP19-151.pdf

TLP19- 152 - Gypsy and Traveller Empowerment Hertfordshire (GATE Herts)

Respondent: Michael HargreavesMH Planning Consultant

On-behalf of: Gypsy and Traveller Empowerment Hertfordshire (GATE Herts)

Submission Number:152

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We would emphasise that we strongly support LB Enfield's approach in addressing the local accommodation needs of its Gypsies and Travellers, including the allocations at Bullscross Nursery, Adjacent to Ridgeway, on the A10, and potentially at Chase Park and Crews Hill . If other Councils showed such leadership in addressing their local needs, there would not be the degree of accommodation crisis there is among the Gypsy communities. This is not only urgently important for itself, but also because without addressing the accommodation crisis, it will be very difficult to address the other deprivation – in health, education, mental health, life expectancy etc, - which Gypsy people experience.

Having outlined our general support for the Local Plan proposals, we have two concerns related to soundness.

1. While we strongly support Policy TLP2, and acknowledge the thought that has gone into it, we question whether the strand of the policy relating to Transit Pitches is justified in the sense of an appropriate strategy. Since transit pitches provide for the more nomadic population, there is no need for them to accommodate mobile homes, but they should accommodate light goods vehicles, as well as cars. We would also suggest that utility buildings only need to provide a wash-room providing shower, toilet and sink and a kitchen / living room.

2. The proposals risk not being effective in the sense of being deliverable within the period. This is because section 6 of the plan has nothing to say about the challenges of implementation and on-going management. Specifically:

- Where will the funding come from?
- Is it assumed that the residential sites will all be social rented sites?
- Is so, who will manage them (and the transit site)? (We say this against the context of the shortage of agencies with experience in site development and management, or of willingness to take on new sites.)
- Has any thought been given to alternatives to social rented sites? We are aware of substantial demand from within the Traveller communities for land or for part developed pitches, which families could acquire and then complete the development themselves. This kind of approach should be cheaper to provide than social rented pitches, it will potentially result in capital receipts for investment in further sites, and it
  gets round the need for ongoing management.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Modify the transit pitch section of Policy TLP2 so it reads:

All transit pitches must include:

- Space for 2 touring caravans and parking for 2 cars or light goods vehicles
- A utility building with a washroom providing a shower, toilet and sink and a kitchen / living room.

2. Modify section 6 by providing an appropriate amount of information for a local plan about how the sites will be developed, funded, and managed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

GATE Herts is one of the leading locally based Gypsy and Traveller organizations in England. We operate locally across Hertfordshire, which adjoins and is significantly influenced by Enfield. We would contribute the lived experience of Gypsies and Travellers, as well as substantial experience of planning for Gypsies and Travellers across the country.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-152 email.pdf
2. TLP19-152.pdf

Policy TLP2 Design and Site Layout

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan

A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We would emphasise that we strongly support LB Enfield's approach in addressing the local accommodation needs of its Gypsies and Travellers, including the allocations at Bullscross Nursery, Adjacent to Ridgeway, on the A10, and potentially at Chase Park and Crews Hill . If other Councils showed such leadership in addressing their local needs, there would not be the degree of accommodation crisis there is among the Gypsy communities. This is not only urgently important for itself, but also because without addressing the accommodation crisis, it will be very difficult to address the other deprivation – in health, education, mental health, life expectancy etc, - which Gypsy people experience.

Having outlined our general support for the Local Plan proposals, we have two concerns related to soundness.

1. While we strongly support Policy TLP2, and acknowledge the thought that has gone into it, we question whether the strand of the policy relating to Transit Pitches is justified in the sense of an appropriate strategy. Since transit pitches provide for the more nomadic population, there is no need for them to accommodate mobile homes, but they should accommodate light goods vehicles, as well as cars. We would also suggest that utility buildings only need to provide a wash-room providing shower, toilet and sink and a kitchen / living room.

2. The proposals risk not being effective in the sense of being deliverable within the period. This is because section 6 of the plan has nothing to say about the challenges of implementation and on-going management. Specifically:

- Where will the funding come from?
- Is it assumed that the residential sites will all be social rented sites?

- Is so, who will manage them (and the transit site)? (We say this against the context of the shortage of agencies with experience in site development and management, or of willingness to take on new sites.)
- Has any thought been given to alternatives to social rented sites? We are aware of substantial demand from within the Traveller communities for land or for part developed pitches, which families could acquire and then complete the development themselves. This kind of approach should be cheaper to provide than social rented pitches, it will potentially result in capital receipts for investment in further sites, and it gets round the need for ongoing management.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

1. Modify the transit pitch section of Policy TLP2 so it reads:

All transit pitches must include:

- Space for 2 touring caravans and parking for 2 cars or light goods vehicles
- A utility building with a washroom providing a shower, toilet and sink and a kitchen / living room.

2. Modify section 6 by providing an appropriate amount of information for a local plan about how the sites will be developed, funded, and managed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

GATE Herts is one of the leading locally based Gypsy and Traveller organizations in England. We operate locally across Hertfordshire, which adjoins and is significantly influenced by Enfield. We would contribute the lived experience of Gypsies and Travellers, as well as substantial experience of planning for Gypsies and Travellers across the country.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	

Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

6 Implementation and Monitoring

Comment Number: 5

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

We would emphasise that we strongly support LB Enfield's approach in addressing the local accommodation needs of its Gypsies and Travellers, including the allocations at Bullscross Nursery, Adjacent to Ridgeway, on the A10, and potentially at Chase Park and Crews Hill . If other Councils showed such leadership in addressing their local needs, there would not be the degree of accommodation crisis there is among the Gypsy communities. This is not only urgently important

for itself, but also because without addressing the accommodation crisis, it will be very difficult to address the other deprivation – in health, education, mental health, life expectancy etc, - which Gypsy people experience.

Having outlined our general support for the Local Plan proposals, we have two concerns related to soundness.

1. While we strongly support Policy TLP2, and acknowledge the thought that has gone into it, we question whether the strand of the policy relating to Transit Pitches is justified in the sense of an appropriate strategy. Since transit pitches provide for the more nomadic population, there is no need for them to accommodate mobile homes, but they should accommodate light goods vehicles, as well as cars. We would also suggest that utility buildings only need to provide a wash-room providing shower, toilet and sink and a kitchen / living room.

2. The proposals risk not being effective in the sense of being deliverable within the period. This is because section 6 of the plan has nothing to say about the challenges of implementation and on-going management. Specifically:

- Where will the funding come from?
- Is it assumed that the residential sites will all be social rented sites?
- Is so, who will manage them (and the transit site)? (We say this against the context of the shortage of agencies with experience in site development and management, or of willingness to take on new sites.)
- Has any thought been given to alternatives to social rented sites? We are aware of substantial demand from within the Traveller communities for land or for part developed pitches, which families could acquire and then complete the development themselves. This kind of approach should be cheaper to provide than social rented pitches, it will potentially result in capital receipts for investment in further sites, and it
  gets round the need for ongoing management.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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- A utility building with a washroom providing a shower, toilet and sink and a kitchen / living room.

2. Modify section 6 by providing an appropriate amount of information for a local plan about how the sites will be developed, funded, and managed.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)

* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

GATE Herts is one of the leading locally based Gypsy and Traveller organizations in England. We operate locally across Hertfordshire, which adjoins and is significantly influenced by Enfield. We would contribute the lived experience of Gypsies and Travellers, as well as substantial experience of planning for Gypsies and Travellers across the country.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

TLP19- 153 - Holly Browne

Respondent: Holly Browne

Submission Number:153

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

After attending the consultation at Ridge Avenue Library recently it is clear to me that the proposal to replace the existing skate park facility available for use by existing residents of the area fails to take into account the needs of the local community sufficiently.

Whilst the need for a temporary site for travellers is understandable, I consider that this location is unsuitable due to the impact on traffic at the proposed location, with the vehicular access point being located immediately next to a busy junction and a bus stop. It is reliant on services that are already under stress- including oversubscribed local primary schools, dentists that are not taking on new patients, and gets rid of community asset in a deprived area where there is a severe lack of free to access amenities for young people.

The Edmonton skate park is the only public skate park in the area. By definition, users are likely to travel on foot/skateboard to reach it and removing this valuable public sports and recreation facility will therefore have a negative effect on the health and well-being of local residents. Moreover, skateboarding is a sport that is well known to appeal to younger people, and thus the removal of

this important asset unfairly and disproportionately impacts younger people (who are less likely and less well equipped to advocate for themselves). In that regard, my own young children have used the
edmonton skate park many times over a number of years. They have taken up skateboarding as a direct result of being inspired by seeing other users of the park on their doorstep, which made it clear to them that this is an accessible sport for them and not just for others in more privileged areas or which require a car to travel to. They are devastated by the news that the local council wishes to take this important facility away from them and other local skaters, off the back of the free to access tennis courts also being removed around 5 years ago.

I am astounded that the present proposal to remove this important public asset follows so shortly after significant public funds were invested in updating and improving the site around 5 years ago. That investment followed a previous proposal to extend the cemetery on both the old tennis courts and skate park adjoining the plot. However, the skate park was ultimately preserved and indeed renovated following that consultation.
I find it difficult to understand why this site would therefore be proposed for redevelopment at this time, having previously been judged unsuitable for extension of the cemetery and public money invested in its improvement for the benefit of the local community. I have seen no reference to this in the consultation documents and therefore conclude it has either not been taken into account, or otherwise unreasonably dismissed. It also does not take into account approved plans to renovate the toilets and add a cafe.

So far as access is concerned, the A10 is very busy road at all times of day and night, with the church road junction being a particular hot spot. Adding access to a significant traveler site as proposed will clearly exacerbate this situation, especially at a place that is meant for travellers to stay at only temporarily. I am also concerned about the impact for bus users, particularly late at night, which I cannot see has been taken into consideration in the consultation papers. In summary, I consider that the proposed A10 site would unfairly and unnecessarily remove a valuable existing facility for existing, permanent residents in the area, particularly young people and is also likely to have a significant negative impact on local travel infrastructure.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-153.pdf

TLP19- 154 - Carl Whayman

Respondent: Carl Whayman

Submission Number:154

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to object in the strongest possible way to the proposal to locate a traveller's site at the above location.

I [redacted] have lived in the Borough of Enfield for over 25 years [redacted]

I mention the school and its proximity to the proposed site because my wife and I both experienced ,on multiple occasions ,high speed, and sometimes dangerous driving along the Ridgeway and by adding additional traffic flows onto and off from the highway is very dangerous and a real safety risk to the school, children , parents, and local existing residents.

I am a Felow of The Royal Institution of Charted Surveyors and for over 40 years have specialised in property and estate management and over those years I have direct and relevant experience into many aspects of property , development , density , use classes , placemaking and site selection and viability.

In my professional opinion , whilst recognising the real need for the UK, and in turn Enfield, to procure and deliver more housing stock and selection (s) across all tenure types - from private, affordable ,social ,temporary BTR,PRS etc the simple fact remains that the location of this site is totally unsuitable for any development and will have an unnecessary and detrimental affect by the loss of green belt . This will negatively affect wildlife and directly cause other environmental issues including noise and pollution.

There are ,across the Borough , other more suitable sites with better infrastructure and amenity that could accommodate a traveller's site. From a highway and services perspective, I would imagine that there is likely no gas , sewers, or water supply to the site and by proposing 12 traveller families is that not disproportionate to the small number of local and isolated house already there – 5 or 6 properties I suspect at most ?

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-154.pdf

TLP19- 155 - Scott & Hayley Francis & Pugh

Respondent: Scott & Hayley Francis & Pugh

Submission Number: 155

Submission Date: 12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

- Traveller Local Plan document as a whole
- Integrated Impact Assessment
- A particular section of the Traveller Local Plan
- * A specific site or allocation in the Traveller Local Plan
- A specific policy in the Traveller Local Plan
- A paragraph or set of paragraphs in the Traveller Local Plan
- Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Introduction
1. This regulation 19 submission is made on behalf of Ms Lisa Peters, Mr Paul Peters, Mr Scott Francis and Mr Sukru Kurt in response to Enfield Council's ("the Council") Proposed Submission Draft Traveller Local Plan 2020-2041 ("the Draft Plan"). In short, we have serious concerns about the soundness of the Draft Plan. We also question whether the Council will be able to demonstrate to an Inspector that it has properly complied with the legal duties imposed on it in the preparation of the Draft Plan (particularly with regard to the duty to cooperate and the duty to undertake proper consultation).
2. In particular, we do not consider that the proposed allocation of the Land adjacent to the Ridgeway with reference TLP-03 ("the Proposed Allocation") ("the Site") can properly be considered as sound. The allocation ought to be removed from any further version of the Draft Plan and before it is submitted for examination. We are confident that the Inspector appointed to examine the Draft Plan (assuming that it can be considered ready to
be submitted which will plainly require the Council to undertake significant further work) will share our concerns about the soundness of the Proposed Allocation.
3. [redacted] we have identified clear characteristics of the Site that would make it unsuitable for use for traveller accommodation. We do not consider that the Council has considered these matters properly. Regardless of the inappropriate nature
of the Site for the proposed purpose, we also do not consider we have been properly consulted with throughout the development of the Draft Plan.

4. We are disappointed that the matters raised in the regulation 18 submission of Ms Peters, submitted on the 31st of October 2024, do not appear to have been properly considered by the Council (if at all). The issues raised therein (and that representation continues to be relied upon in full), which go to the heart of the soundness of the Proposed Allocation, have not been addressed by the Council. We expect, therefore, that the Council will fully anddemonstrably consider all of the matters raised in this submission. It is plain, not only from the matters raised by us but also from wider concerns, that the soundness of the Draft Plan needs to be addressed and that it is far from ready for submission to the Secretary of State
for examination.
5. We remind the Council that it is under a strict duty imposed by section 20(2) of the Planning and Compulsory Act 2004 to only submit the Draft Plan for examination where (a) it is capable of demonstrating that it has fully complied with the relevant legal requirements and (b) when the Draft Plan is, in the Council's opinion, ready for independent examination. It is plain, however, that the Draft Plan is not yet ready for independent examination and that, when properly considered, the Proposed Allocation is not sound and should be removed from the Draft Plan before it is submitted to the Secretary of State.

Duty to Cooperate
6. Section 33A of the Planning and Compulsory Purchase Act 2004 imposes a legal duty on the Council to cooperate, in the preparation of the Draft Plan, to "engage constructively, actively and on an ongoing basis" with other bodies. If the Inspector does not consider that the duty has been complied with, then the Draft Plan cannot be adopted.
7. The Council's position is a broad brush statement at paragraph 1.19 of the Draft Plan that "All adjoining authorities have been contacted" and "To date, none have confirmed that they would be able to assist". No justification is provided at this stage or during the regulation 18 stage, however, as to why the scope of the Council's engagement was limited to just adjoining authorities. The test within section 33A(4) of the Planning and Compulsory Purchase Act 2004 is whether or not there is a "significant impact on at least two planning areas"; it is not limited geographically to simply adjoining authorities.
8. Page four (as well as the table on p16) of the Issues and Options Consultation Statement (September 2024) indicates that the Council were told by Essex County Council that, as it was not responsible for housing gypsies and travellers, direct engagement should take place with unitary, district and borough councils within Essex. It does not appear, however, that, at least at regulation 18 stage, that was carried out (see the list of authorities at paragraph 3.1, p7). Moreover, the Duty to Cooperate Statement (September 2025) at paragraph 3.4 continues to refer to Essex County Council as being an authority with which the Council cooperated with, despite the fact that it is clear no meaningful cooperation could take place with that authority and that other authorities required to be engaged with.
9. The log of correspondence at E7.9.2 (submitted as part of the local plan examination) makes clear that the Council continued to write to the County Council despite it reemphasising that it had no role to play. It is correct that the Council engaged with Epping Forest District Council, which is a neighbouring authority, but it does not appear from any of the evidence base that engagement took place with any other authorities in Essex.
10. Further, the London Borough of Newham indicated that it was "open to further discussion in a duty to cooperate meeting" (Issues and Options Consultation Statement (September 2024), p7). Again, it is wholly unclear from the chronology in E7.9.2 that such a meeting
ever took place with Newham or any other authority.

11. The Council appears to have simply concluded that all three responses "confirmed that they would not be able to meet any of Enfield's identified need" (Issues and Options Consultation Statement (September 2024), p31). This was despite the fact that the Council was told that there were other authorities it needed to speak to and the fact that at least one authority was open to a meeting.
12. It does not appear, therefore, that the Council has fully complied with the duty to cooperate and undertaken thorough rather than perfunctory engagement with other authorities. The exercise does not appear to have been ongoing and active (as is required by the duty– see, for example, R (on the application of Central Bedfordshire Council) v Secretary of State for Communities and Local Government [2015] EWHC 2167 (Admin) at paragraph 50). As was made clear in R (St Albans City and District Council) v Secretary of State for Communities and Local Government [2017] EWHC 1751 (Admin), as "the duty to cooperate is active and on-going", this "means active and on-going even when discussions seem to have hit the buffers". The failures of the Council in this respect are fundamental flaws which undermines the legal compliance of the Draft Plan.

Consultation
13. The PPTS is clear in Policy A that the Council should have paid "particular attention to early and effective community engagement with both settled and traveller communities"(paragraph 7a). It is of note that London Gypsies and Travellers themselves stated that communities near potential sites should be "closely consulted" throughout the process (Issues and Options Consultation Statement (September 2024), table one at response 7).
14. We do not consider, however, that the Council has adequately discharged its obligation to consult in the process of preparing the Draft Plan. This is because:
a. residents were not properly consulted with as information was not accessible; and
b. notification letters were not provided to residents near the Site.
15. This likely means that many of those who would wish to make representations on the Draft Plan are either in the dark as to its existence; or not properly equipped with all the information they need to make an informed representation. This also undermines the fairness of the plan making process.

Exceptional Circumstances
16. The National Planning Policy Framework ("NPPF") is clear that land within the Green Belt should only be allocated where exceptional circumstances are fully evidenced and justified. The Council needs, however, to be able to demonstrate that it has examined fully all other reasonable options for meeting the identified need.
17. Moreover, the current 2024 iteration of the NPPF is clear that "Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt alocations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework" (paragraph 148).

18. Our position, as explained further below, is that (a) the need to promote sustainable patterns of development, and (b) the application of paragraphs 110 and 115 of the 2024 NPPF indicate that (c) the Site is not a suitable or appropriate location for development. The Exceptional Circumstances Topic Paper (September 2025) does not refer at paragraph 4.47 (or elsewhere) to grey belt. The Council appear to be proceeding on the basis that the Draft Plan ought to be examined in terms of consistency against the earlier 2023 version of the NPPF and without consideration to grey belt as required by the current 2024 NPPF.

19. The draft Enfield Local Plan is at examination. It has not, therefore, been adopted. The Council needs to (a) consider and (b) justify whether, given the fact that the current version of the NPPF was adopted nearly one year ago, it is appropriate or sound for the Council to rely on the transitional arrangements at paragraphs 234 and 235 of the 2024 NPPF so as to resist assessment against the 2024 NPPF. It is plain that if the Draft Plan was to be assessed against the 2024 NPPF, the inevitable conclusion is that it is not sound due to, inter alia, the omission of any consideration of grey belt. It is clear from paragraph 5.14 of the Site Selection Topic Paper (September 2025) that this Site cannot be considered grey belt and therefore would not meet the requirement.
20. Further, the Council has stated that it could not expand or refurbish any existing facilities (paragraph 4.3 of the Draft Plan). It is plain from paragraph 3.23 of the Site Selection Paper (September 2025) that the Council has given no consideration, however, to regularising any existing unauthorised sites or facilities (either by inviting a retrospective application or taking enforcement action to invite a ground (a) appeal) and whether any of those sites, if regularised, could be expanded so as to contribute towards meeting the identified need. It has not adequately demonstrated, therefore, that the removal of the Site from the Green Belt is justified and that there truly are no alternatives.
21. Moreover, the site selection methodology is neither robust nor transparent. The evidence provided by the Council is limited and does not demonstrate that the Proposed Allocation (or indeed the Draft Plan) has been positively prepared and is justified. It is wholly unclear, for example, given how this Site was scored in comparison to others at earlier stages of the plan making process, how it can be considered justified by the Council? It is also unclear why some other sites were rejected for inclusion in the Draft Plan. The Council should,
therefore, publish the whole of its site selection process as part of the evidence base to ensure that affected parties can understand (a) if the Council has complied with its legal duties and (b) see how the Site is justified. To not do so again undermines the fairness of the plan making process and means inadequate justification has been provided for the Proposed Allocation. 22. The Site is one which the Council considers is within an area of the Green Belt that makes a “relatively strong contribution to Green Belt purpose 1”, a relatively strong contribution to Green Belt purpose 2” and “a strong contribution to Green Belt purpose 3” (paragraph 5.14 of the Site Selection Topic Paper (September 2025)). The height of the case for
exceptional circumstances is said to be the need and lack of suitable alternative deliverable sites. This is, however, neither robust nor well-reasoned, as the same could be said of any Green Belt site in the borough.
23. It is clear that this Site is exactly the sort of site that should not be released from the Green Belt. The justifications relied upon by the Council as expectational circumstances fall well short of truly being considered exceptional and are, in truth, generalised. The analysis undertaken by the Council does not explain adequately how, despite the high value of this Site in terms of its contribution to the Green Belt purposes, the circumstances are such as to truly be exceptional.

Soundness of the Proposed Allocation
24. We remind the Council that the Proposed Allocation, in order to be considered sound, needs to be: positively prepared; justified; effective; and consistent with national policy (see paragraph 36 of the 2024 NPPF). It is plain, however, that the Proposed Allocation cannot be considered sound.
25. In the regulation 18 Draft Local Plan, the Site was one of 11 sites considered. Many of the sites discounted by the Council were discounted, however, for reasons which are also true of this Site. The Council has not, therefore (a) acted consistently or (b) fully justified the Proposed Allocation. By way of one example, the Council discounted Durant’s Park at regulation 18 stage due to the “Restrictive covenant on-site preventing change of use”. Ms Peters, in her regulation 18 response, drew the Council’s attention to her understanding that there was similarly a restrictive covenant

in respect of this Site. As identified in the Council's own site selection methodology (see the Site Selection Paper (June 2024), threats to deliverability, such as legal issues which demonstrate that a site may not be deliverable, are an important consideration in deciding whether to allocate a site or not. Despite this, the identified presence of such a threat to delivery in respect of the Site has not been considered at all by the Council, let alone the implications of this for proposing to select the Site for allocation.

Sustainability

26. The Site is within the Green Belt. Paragraph 148 of the 2024 NPPF is clear, in the context of considering whether exceptional circumstances exist, that the appropriateness of the Site's location needs to be considered "with particular reference to paragraphs 110 and 115" of the 2024 NPPF.

27. Paragraph 110 of the 2024 NPPF is clear that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health". The Site is not one such location.

28. Paragraph 115 is clear that in accessing the suitability of the Site, consideration needs to be given to whether or not, inter alia, "sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location", "safe and suitable access to the site can be achieved for all users" and whether "any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach". The Site is not one such location for the reasons explained below.

29. A key tenant, therefore, of national policy is that sites ought to be (a) sustainable, (b) offer a genuine mode of transport choices and (c) safe in terms of their impact on the transport network and on highway safety. As recognised, however, in the regulation 18 Draft Local Plan, all of the allocations, including in particular the Site, will "have a significant negative effect in relation to minimizing the need to travel and supporting a modal shift away from the private vehicle" as they all "have poor access to public transport, and some are not located in close proximity to a major, district or local centre". There are, therefore, clear and important conflicts with national policy which means that the Proposed Allocation cannot be considered sound (and indeed the same can be said for all of the allocations).

30. The Site Selection Paper (June 2024) accepts that the Site is a "relatively isolated site" but says that "it has the capacity to deliver a significant proportion of the immediate need for pitch provision, and the available alternative options are limited" (p9). This is an erroneous and misconceived approach for the Council to adopt. The Council appears to have selected the Site not because it accords with national policy for the location of gypsy and traveler sites but simply because it considers that it can make a significant contribution to meet the need (i.e. it has a larger site area than other sites the Council has identified through its site identification processes). This approach fails, however, to acknowledge the clear shortcomings of the Site, including its extremely low public transport accessibility levels ("PTAL") score.

31. The updated Site Selection Methodology (September 2024) is clear that isolated Green Belt Sites should not be allocated unless there are exceptional circumstances (p22).

32. The Integrated Assessment (paragraphs 5.22 to 5.23) notes that the Site is not "within close proximity of a GP surgery or walking and cycling routes" and that it is "not within close proximity of a primary or secondary school". It says at paragraph 5.27 that: "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" (emphasis added).

33. The Council's own position, as set out at paragraph 5.18 of the Site Selection Topic Paper (September 2025) is that the Site has "good access to services". This is, however, plainly not the case and is totally at odds with the evidence base, e.g. the Integrated Assessment. The conclusion that services are easily accessible by public transport (paragraph 5.18) is also at odds with the conclusions of the Integrated Assessment.
34. The Council has stated that a bus stop is located at the entrance (paragraph 4.14 of the Draft Plan). The existing entrance is not proposed to be used (see the Capacity Assessment at p12). Residents of the site will have to walk down the lane, therefore, from the new proposed entrance (see p10 of the Capacity Assessment) to access the bus stop. Further, a return journey will also necessitate the use of the bus stop on the other side of the road, for which there is no crossing facility. Neither the Ridgeway, a 50mph road, nor the lane connecting the Site to the Ridgeway have street lights. The footpath is extremely narrow, is in poor condition and users must walk in single file. There is little separation between the busy and fast traffic and pedestrians.
35. Moreover, during autumn and winter months, when it is dark much earlier, pedestrians would have to try and navigate that footpath and cross the road in darkness. This is clearly unsafe. It further highlights that, contrary to national policy, residents of the Site will not have access to a range of transport modes, including public transport, and will be dependent on the private vehicle. The Draft Plan says that safe pedestrian access is to be provided but the Proposed Allocation should not be included in the Draft Plan until it has been evidenced that safe access can be provided, which seems unlikely given the physical nature of the road, the lack of streetlighting and the high speeds experienced along the road (discussed further below in relation to highways safety).
36. The PPTS is clear that plan making should "increase the number of traveller sites in appropriate locations" and "enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure" (paragraph four). Policy B is also clear that "Local Plans must be prepared with the objective of contributing to the achievement of sustainable development". The Proposed Allocation is,
therefore, contrary to important parts of national policy as it falls well short of compliance with those parts of national policy. Highways Safety
37. Development on the Site will lead to an increase in traffic. The Capacity Assessment makes clear at p12 that a new entrance will be required and that the existing entrance from the Ridgeway will not be used due to a potential highways impact (but could be considered subject to traffic analysis). This will lead, therefore, to a significant increase in the volume of traffic using the existing roadway and in needing to join the Ridgeway at the existing junction.
38. The Ridgeway is a busy road with a speed limit of 50mph. The junction is, however, already dangerous, particularly due to the proximity of the bus stop which results in vehicles, on the wrong side of the road, overtaking at speed parked buses and potentially meeting cars turning onto the Ridgeway. We have ourselves experienced a number of near misses with speeding and overtaking vehicles. We also know neighbours who have been the subject of accidents when accessing and egressing their properties.
39. The use of the Site (it is reasonable to assume that 12 pitches will give rise to at least 22 additional vehicles using the junction and the lane) will exacerbate those safety issues and result in serious safety concerns not just for users of the road and the potential occupiers of the Site but also for the school children who use the existing lane adjacent to the Site to come to and from the bus stop, and who will congregate at the bus stop at points of drop off and pick up which will coincide with the hours of peak traffic movements. It follows that it is wrong to consider the lane as disused (paragraph 5.16 of the Site Selection Topic Paper (September 2025)).

40. National policy is clear that in plan making, it is necessary to identify and pursue "opportunities to promote walking, cycling and public transport use" (paragraph 109(e) of the 2024 NPPF). This Site will not do so – and there is also conflict with paragraph 111(d) and paragraph 115. Further, the fact that "safe and suitable access" cannot be achieved for all users (disabled people, parents with prams and children would face particular difficulties in using the existing footpaths) means there is a conflict with paragraph 115 of the 2024 NPPF. Again, the Proposed Allocation cannot be considered sound due to the inconsistency with national policy.
41. Moreover, given the context of the road and its current speed limit and users, and that there would be a significant increase of vehicular traffic at the junction with the Ridgeway by comparison to the existing situation, it is our firmly held view that the Proposed Allocation would give rise to an unacceptable impact on highway safety, which would require planning permission to be refused. In the circumstances, it is plainly incumbent on the
Council to fully consider the highways impact of the Proposed Allocation, and to make available its suitable evidence base regarding those highways' impacts and their acceptability.

Services and Infrastructure
42. The Capacity Assessment (August 2025) states that "It is reasonable to assume that power, water and sewage are in close proximity due to existing homes. The exact connection details and constraints need to be ascertained" (p12). That assumption is not, however, reasonable or supported by evidence. There is no mains sewage or gas connection close to the Site as those stop at Botany Bay which is about a mile away. Water pressure and electricity in the locality is also poor.
43. London Gypsies and Travellers themselves stated that a key design requirement was "sustainable digital infrastructure to combat digital exclusion" (Issues and Options Consultation Statement (September 2024), table one at response 7). Yet, and as made clear by Ms Peters, the internet infrastructure in the locality is poor.
44. It is disappointing, therefore, that the Council, despite having been told of these issues at the regulation 18 stage, have persisted with the Proposed Allocation. This is despite the fact that it does not have access to the requisite infrastructure and services to support the development anticipated in the Proposed Allocation. This is plainly a constraint on development which means the Proposed Allocation is not sound (stage five of the Council's
own methodology makes clear that site infrastructure will be material to assessment of deliverability). Further, it means that the Proposed Allocation cannot be considered as effective as with (inter alia) these constraints, it not apparent that it will be possible for the Proposed Allocation to be delivered.
Flooding
45. The Draft Local Plan notes that the Site is considered to be within Flood Zone One. The Council's approach has been predicated, therefore, on the Site not being at risk from flooding (see for example paragraph 5.32 of the Integrated Assessment). Our experience, however, is that the Site does experience periodic flooding.
46. The Site is a boggy field and often suffers from flooding in wetter months. This affects not just the Site but also the locality as water from the Site, when flooded, has been displaced onto the Ridgeway and has caused highways safety issues. The Ridgeway in this area was rebuilt in late 2005 to address issues of subsidence associated with the movement of water and impacts on ground stability. Works are again necessary and due to be undertaken by the Council at the start of November 2025. In addition to these more significant works, there have been numerous (and frequent) emergency repairs along the Ridgeway near our properties.
47. The Environment Agency has said that there is a need to "avoid all areas of flood risk" and have highlighted the need for careful consideration of flood risk due to the fact that "permanent residential caravans are highly vulnerable" (Issues and Options Consultation Statement (September 2024), table one at response 9).

48. The Site is plainly not suitable or safe for residential occupation due to the demonstrated risk of flooding. Policy B of the PPTS is clear that sites should not be located "in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans" (see paragraph 13(g)). This means there is again a constraint on development which means the Proposed Allocation cannot be considered sound or effective.

Design

49. As shown in the indicative design for the Site (Executive Summary of the Capacity Assessment (August 2025)), the nature of the Site's triangular layout means that the pitches will effectively be aligned alongside each other and adjacent to the A1005. This means future residents, including children, will be exposed not only to the noise but emissions arising from the cars on that road.

50. The Integrated Assessment (paragraph 5.22) scores the Site negatively under the heading of Health and Wellbeing due to the fact it "experiences noise pollution". It also notes (paragraph 5.26) that "the current mean annual concentration of NO2, PM10 and PM2.5 at the site exceeds the 2021 WHO guidelines". There is again, therefore, a conflict with national policy as Policy B of the PPTS is clear that in plan making, there needs to be

"proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development" (see paragraph 13). We are also concerned, on the basis of our local experience, about the impact of wind, due to the topography of the Site, on future occupiers. Further, the topography is such that landscape and visual harm will be

augmented. 51. The indicative layout can be contrasted with the best practice examples highlighted by the Capacity Assessment at p4. It cannot achieve, for example, the horseshoe or circular layout for internal circulation which is highlighted by the assessment as desirable (p7). This is because, as the Capacity Assessment recognises, "The site is an awkward shape which does not lend itself to an efficient layout" (p11). The dimensions of Land at Sterling Way/Weighbridge and Land south of Dendridge Close were such so as to discount those sites (p22 of the Site Selection Topic Paper (September 2025)) and a similar approach ought to have been adopted to this Site. Again, the Council has not acte consistently and has not justified the Proposed Allocation.

Nearby Community

52. The quantum of development anticipated in the allocation is not appropriate to the local context. In particular, it is not appropriate having regard to the poor local infrastructure and the population size and density. This is another important conflict with national policy as the PPTS is clear in Policy C that in plan-making "When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community" (paragraph 14).

53. The quantum proposed here, however, will result in the development which is anticipated by the Proposed Allocation dominating local residents. This also risks undermining the imperative in national policy for social cohesion and integration e.g. as set out in paragraph 13(a) of the PPTS which says that in plan-making, the Council should ensure that the policies "promote peaceful and integrated co-existence between the site and the local

community". The domination of that local community, however, means this policy imperative is not likely to be achieved. This again means the Proposed Allocation is not sound.

Habitats and ecology/biodiversity

54. We are concerned about the impact of development on the Site on established habitats. Several species, including bats, live in the area. We are also concerned about the fact that, as identified in the Habitats Regulations Assessment (June 2025), the Site lies within the zone of influence for the Wormley Hoddesdonpark Woods SAC and has the potential to have a significant recreation effect. This again suggests that the Site is not suitable for the quantum of development anticipated

in the Proposed Allocation. Further, the Capacity Assessment states that “A tree survey should be commissioned to understand the value of existing trees on site”. The Site should not be allocated without (a) a proper understanding of the value of the trees as (b) this again may be a constraint which means that development on the Site is not deliverable.

Conclusion
55. In conclusion, for all the reasons set out above (which include clear inconsistencies with multiple parts of national planning policy), neither the Draft Plan nor the Proposed Allocation can be considered sound. Furthermore, there are serious questions about the legal compliance of the Draft Plan which need to be addressed by the Council.
56. It is clear that, in light of all of the above, (a) the Draft Plan should not be submitted for examination at this stage and (b) that the Proposed Allocation should be removed from any future version before it is submitted for examination. The Council should not submit the Draft Plan in the hope that the Inspector and the examination process will be able to rectify those errors where it is plain that they are fundamental issues which go to the heart of the soundness of the Draft Plan and the Proposed Allocation. Neither are positively prepared, justified, effective or consistent with national policy.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-155 email.pdf
2. TLP19-155.pdf

TLP19- 156 - Mr & Mrs Bishop

Respondent: Mr & Mrs Bishop

Submission Number:156

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Bulls Cross Nursery in the Regulation 19
Traveller Local Plan. The allocation is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy. I endorse the detailed submission made by the Forty Hill and Bulls Cross Study Group.

1. Green Belt and Local Open Space:
The Bulls Cross site’s release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The Sustainability Appraisal records “significant negative” effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:
The Plan over provides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with
Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy. There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less constrained sites could meet the Borough's needs without causing such material harm to the Green Belt/open space at Bulls Cross and must be sought through another call for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield TLP. It is therefore untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical importance.

4. Deliverability and Fire Safety:
The Council's assumed 8 pitches ignore site shape, access and tree constraints. Spatial analysis by the Forty Hill and Bulls Cross Study Group supports only 3–4 deliverable pitches, below the Council's own 6-pitch threshold. However, once critical BRE Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not being deliverable in compliance with BRE Fire Safety Guidance.

5. Trees, Ecology and Root Protection:
Numerous Category A & B protected trees would be lost or compromised, causing biodiversity, visual harm and adverse impact on the Priority Habit, Conservation Area, Green Belt, Metropolitan Open Land and Listed assets. The proposed development would encroach on root protection areas contrary to British Standards and best practice guidance.

6. Accessibility and Sustainability
Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The Forty Hill and Bulls Cross Study Group's swept-path analysis evidences how the turning head and entranceway are inadequate and poorly located, conflicting with highways design standards and the
TLP's own layout requirements. There will be significant environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

Conclusion:
TLP is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early
stage with communities and statutory consultees before any re-allocation.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-156.pdf

TLP19- 157 - Donna Jones

Respondent: Donna Jones

Submission Number:157

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This is unsound and not an appropriate area to allow as a travelers site. It is a family orientated area with children and adult sports, dog walkers and after discussions with neighbours, the general opinion is most people will feel very unsafe and anxious about walking in Bulls Cross.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

All the above and my comments below .

Green belt and local open space concerns reduce green belt openness and materially harm the open/rural setting outside of the established settlement boundary.

Heritage and conservation failings not giving sufficient materials weight to heritage considerations, Grade 11 listed properties, including Myddelton House) within 250m of many listed assets, within Forty Hill conservation area and an archaeological priority area.

Trees, ecology and root protection numerous category A & B protected trees (oak, ash, sycamore) with significant group value, bound the site; proposed pitches, access, building and hard standing encroach to root protection areas, contrary to British Standards.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-157 main.pdf
2. TLP19-157.pdf

TLP19- 158 - Janet Montgomery

Respondent: Janet Montgomery

Submission Number:158

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I want to register my objection to the proposed Traveller site in the Ridgeway Enfield.
1. This is Greenbelt land and should be maintained as such, other sites like the Ridgeway have already been rejected as unsuitable and I would like to state strongly that I believe the Ridgeway to also be unsuitable.
2. The increase to traffic on the road will create not only queues but will also make the road unsafe especially for school children around the bus stop.
3. There are currently only 5 houses in the immediate, the extra units will be disproportionate to existing housing. Placing a strain on utlities which are already stretched.
4. The field itself has a tendency to get boggy making the parking and use of vehicles on the site, extremely unsuitable.
5. Being a greenfield site there will also be a negative inpact on local wildlife
6. The proposed plans will also bring an increased level in noise and light pollution

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-158.pdf

TLP19- 159 - John Silva

Respondent: John Silva

Submission Number:159

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I want to register my objection to the proposed Traveller site in the Ridgeway Enfield.

1. This is Greenbelt land and should be maintained as such, other sites like the Ridgeway have already been rejected as unsuitable and I would like to state strongly that I believe the Ridgeway to also be unsuitable.
2. The increase to traffic on the road will create not only queues but will also make the road unsafe especially for school children around the bus stop.
3. There are currently only 5 houses in the immediate, the extra units will be disproportionate to existing housing. Placing a strain on utlities which are already stretched.
4. The field itself has a tendency to get boggy making the parking and use of vehicles on the site, extremely unsuitable.
5. Being a greenfield site there will also be a negative inpact on local wildlife
6. The proposed plans will also bring an increased level in noise and light pollution

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-159.pdf

TLP19- 160 - sonja Everist

Respondent: sonja Everist

Submission Number:160

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to object to the proposed travellers' site in Bulls Cross Conservation area, a location of significant historic architectural and environmental value, any such use would, in my view, be wholly inappropriate and contrary to adopted planning policy.

1. Harm to the Bulls Cross Conservation Area and Heritage Assets.
Bulls Cross is one of Enfields Most historically important Conservation Areas,containing listed buildings,traditional farmsteads,and established rural landscapes dating back several centuries.The introduction of a travellers site,with associated hardstanding,vehicles,and temporary structures,would cause substantial harm to the SPECIAL CHARACTER and APPEARANCE of the area defined under Section 72 of the planning (Listed buildings and Conservation Areas) Act 1990 .This proposal is inconsistent with Policies DM44 and DMD80 of the Enfield Development Management Document,which requires development within conservation areas to preserve or enhance their character.It would also conflict with Chapter16 of the National Planning Policy Framework (NPPF) which emphasises the need to protect heritage assets and their settings.

2. ENVIRONMENTAL AND GREEN SPACE IMPACT

The Bulls Cross area forms part of Enfields Green belt and provides a valuable buffer of open countryside between Urban Enfield and the Lea Valley. A travellers site in this location would result in:
*Loss of open Green Space and agricultural land.
* Damage to local habitats and biodiversity.
* Visual Intrusion in views across the rural landscape.

These impacts are contrary to NPPF Chapter 13 (protecting Green Belt land) and Policy DMD83 (Development of the Green Belt) which restrict inappropriate development that harms the openness and permanence of the Green Belt.

3. IMPACT ON LOCAL CHARACTER AND AMENITY
Bulls Cross is valued for its peaceful,rural character and distinct sense of historical continuity. The proposed use would introduce visual clutter,noise,and increased vehicle movement-all of which would erode the area's distinctive rural quality and diminish the experience of nearby heritage sites including Myddleton House and Capel Manor Gardens.

4. PRECEDENT AND POLICY CONSISTENCY
Permitting such development in a Conservation Area would set a damaging precedent undermining Enfield Council's long-standing commitment to conserving its historic and natural environment. It would weaken the credibility of local planning and make future protection of similar heritage areas more difficult.For the reasons stated above,I respectfully urge the council to refuse planning permission or take enforcement action to prevent use of the land as a traveller's site within or adjacent to Bulls Cross Conservation Area.This proposal conflicts with the ENFIELD LOCAL PLAN, the DEVELOPMENT MANAGEMENT DOCUMENT and the NATIONAL PLANNING POLICY FRAMEWORK with respect to Heritage Conservation,visual amenity,and Green Belt Protection. Thank you for considering my objection.I trust the Council will recognise the need to safeguard the unique historic and environmental character of Bulls Cross.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-160.pdf

TLP19- 161 - Lee Bishop

Respondent: Lee Bishop

Submission Number:161

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound		✓
Complies with the duty to co-operate		✓

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I'm writing to oppose the proposed Travellers Site on the A10 skatepark.

My objections are based on the suitability of the site for the number of proposed caravans.

In the last year alone there have been 7 reported fires on UK traveller sites.

The most devastating in July at Redbourn in Herts, where 15 of the 18 families homes were destroyed. Aside from the potential loss of life, Travellers can't get fire insurance so they are left without a home or belongings and thw Council are left having to foot the bill. Putting families into hotel accommodation sometimes for months while the sites are repaired. (see attached PDF for image)

The proposed A10 site is too small for the number of planned caravans.

The site would ideally need to have to be brick or concrete, the doubling up of caravans on pitches means there will be more vehicles on site hence less space between them. At that density there is likley to be a "domino effect" the fire engulfing neighbouring cars and caravans.

The Redbourn fire demonstrated that even with the "planned" 6 mtr separation a small fire can spread very rapidly. Too many vehicles and caravans, propoane gas bottles, waste/rubbish on site and only wooden barriers between pitches were contributory factors.

If such a fire occurred on the A10 it could close this major traffic route for hours. Being a dual carriageway it could be near impossible for emergency vehicles to access the site once traffic starts to back up.

Other considerations include:

The lack of a "play space" within the site

No provision for vehicles waiting to enter the site which is adjacent to a bus stop (a slip road/layby)

Sound screening to cut traffic noise to the site

Landscaping and provision of "green barrier" external to the site

Adequate provision for waste storage and removal, may need to be DAILY refuse collections to reduce potential fire risk on site

Obviously there is the loss of amenity (The skate park) for ratepayers children, which would presumably have to be reinstated in another part of the borough.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-161.pdf

TLP19- 162 - Concetta Everist

Respondent: Concetta Everist

Submission Number:162

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to object to the proposed travellers' site in Bulls Cross Conservation area, a location of significant historic architectural and environmental value, any such use would, in my view, be wholly inappropriate and contrary to adopted planning policy.

1. Harm to the Bulls Cross Conservation Area and Heritage Assets.

Bulls Cross is one of Enfields Most historically important Conservation Areas, containing listed buildings, traditional farmsteads, and established rural landscapes dating back several centuries. The introduction of a travellers site, with associated hardstanding, vehicles, and temporary structures, would cause substantial harm to the SPECIAL CHARACTER and APPEARANCE of the area defined under Section 72 of the planning (Listed buildings and Conservation Areas) Act 1990. This proposal is inconsistent with Policies DM44 and DMD80 of the Enfield Development Management Document, which requires development within conservation areas to preserve or enhance their character. It would also conflict with Chapter16 of the National Planning Policy Framework (NPPF) which emphasises the need to protect heritage assets and their settings.

2. ENVIRONMENTAL AND GREEN SPACE IMPACT

The Bulls Cross area forms part of Enfields Green belt and provides a valuable buffer of open countryside between Urban Enfield and the Lea Valley. A travellers site in this location would result in:

* Loss of open Green Space and agricultural land.

* Damage to local habitats and biodiversity.

* Visual Intrusion in views across the rural landscape.

These impacts are contrary to NPPF Chapter 13 (protecting Green Belt land) and Policy DMD83 (Development of the Green Belt) which restrict inappropriate development that harms the openness and permanence of the Green Belt.

3. IMPACT ON LOCAL CHARACTER AND AMENITY

Bulls Cross is valued for its peaceful, rural character and distinct sense of historical continuity. The proposed use would introduce visual clutter, noise, and increased vehicle movement-all of which would erode the area's distinctive rural quality and diminish the experience of nearby heritage sites including Myddleton House and Capel Manor Gardens.

4. PRECEDENT AND POLICY CONSISTENCY

Permitting such development in a Conservation Area would set a damaging precedent undermining Enfield Council's long-standing commitment to conserving its historic and natural environment.

It would weaken the credibility of local planning and make future protection of similar heritage areas more difficult. For the reasons stated above, I respectfully urge the council to refuse planning permission or take enforcement action to prevent use of the land as a traveller's site within or adjacent to Bulls Cross Conservation Area. This proposal conflicts with the ENFIELD LOCAL PLAN, the DEVELOPMENT MANAGEMENT DOCUMENT and the NATIONAL PLANNING POLICY FRAMEWORK with respect to Heritage Conservation, visual amenity, and Green Belt Protection.

Thank you for considering my objection. I trust the Council will recognise the need to safeguard the unique historic and environmental character of Bulls Cross.

TLP19- 163 - Tottenham Hotspur Football Co Ltd

Respondent: James BeynonQuod

On-behalf of: Tottenham Hotspur Football Co Ltd

Submission Number:163

Submission Date:12/11/2025 09:00 GMT

3 Enfield's Traveller Needs

Comment Number: 5

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further expand on the number of objections outlined in Quod s enclosed Report.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

4 Site Allocations

Comment Number: 6

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment

A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further expand on the number of objections outlined in Quod s enclosed Report.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Bulls Cross Nursery (Site 1)

Comment Number: 3

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared

* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
* Yes, I do wish to participate in hearing season(s)

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further expand on the number of objections outlined in Quod s enclosed Report.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	

Adoption of Traveller Local Plan	✓

IIA

Comment Number: 4

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
  Integrated Impact Assessment
  A particular section of the Traveller Local Plan
  A specific site or allocation in the Traveller Local Plan
  A specific policy in the Traveller Local Plan
  A paragraph or set of paragraphs in the Traveller Local Plan
  Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		✓
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
* Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

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Please refer to enclosed Report prepared by Quod, outlining objections to Site 1.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing season(s)
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If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To further expand on the number of objections outlined in Quod s enclosed Report.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-163 email.pdf
2. TLP19-163 main.pdf
3. TLP19-163 report.pdf

TLP19- 164 - Luke Collins

Respondent: Luke Collins

Submission Number:164

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Harm to the Bulls Cross Conservation Area and Heritage Assets.

Bulls Cross is one of Enfields Most historically important Conservation Areas, containing listed buildings, traditional farmsteads, and established rural landscapes dating back several centuries. The introduction of a travellers site, with associated hardstanding, vehicles, and temporary structures, would cause substantial harm to the SPECIAL CHARACTER and APPEARANCE of the area defined under Section 72 of the planning (Listed buildings and Conservation Areas) Act 1990 . This proposal is inconsistent with Policies DM44 and DMD80 of the Enfield Development Management Document, which requires development within conservation areas to preserve or enhance their character. It would also conflict with Chapter16 of the National Planning Policy Framework (NPPF) which emphasises the need to protect heritage assets and their settings.

1. ENVIRONMENTAL AND GREEN SPACE IMPACT

The Bulls Cross area forms part of Enfields Green belt and provides a valuable buffer of open countryside between Urban Enfield and the Lea Valley. A travellers site in this location would result in:

* Loss of open Green Space and agricultural land.

* Damage to local habitats and biodiversity.

* Visual Intrusion in views across the rural landscape.

These impacts are contrary to NPPF Chapter 13 (protecting Green Belt land) and Policy DMD83 (Development of the Green Belt) which restrict inappropriate development that harms the openness and permanence of the Green Belt.

1. IMPACT ON LOCAL CHARACTER AND AMENITY

Bulls Cross is valued for its peaceful, rural character and distinct sense of historical continuity. The proposed use would introduce visual clutter, noise, and increased vehicle movement-all of which would erode the area's distinctive rural quality and diminish the experience of nearby heritage sites including Myddleton House and Capel Manor Gardens.

1. PRECEDENT AND POLICY CONSISTENCY

Permitting such development in a Conservation Area would set a damaging precedent undermining Enfield Council's long-standing commitment to conserving its historic and natural environment.

It would weaken the credibility of local planning and make future protection of similar heritage areas more difficult. For the reasons stated above, I respectfully urge the council to refuse planning permission or take enforcement action to prevent use of the land as a traveller's site within or adjacent to Bulls Cross Conservation Area. This proposal conflicts with the ENFIELD LOCAL PLAN, the DEVELOPMENT MANAGEMENT DOCUMENT and the NATIONAL PLANNING POLICY FRAMEWORK with respect to Heritage Conservation, visual amenity, and Green Belt Protection

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-164.pdf

TLP19- 165 - Linda Colbeck

Respondent: Linda Colbeck

Submission Number:165

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to raise an objection to the proposed Traveller site on Greenbelt land at the Ridgeway.

I have two main objections, firstly I strongly believe that this development will have a huge impact on the environment and wildlife in the area. There will be huge upheaval during development and ongoing and a considerable increase in the already heavy traffic from the m25 to the surrounding roads.

I also genuinely believe that from the Travellers perspective, this is not a very suitable site. It is on a very busy road. It is not near to shops and is in quite an isolated area, leading to lack of integration of the communities.

Please pass my objections on to the relevant team and if there is any further information you require, please let me know.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-165.pdf

TLP19- 166 - Susan King

Respondent: Susan King

Submission Number:166

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to formally object to the proposed Traveller site at The Ridgeway. While I fully respect the need to provide appropriate sites for all members of our community, I believe this specific location is unsuitable for development under current planning policy for several reasons:

Green Belt Land – The proposed site lies within designated Green Belt, where development should only occur under very special circumstances. Allowing this proposal would set an unsustainable precedent for further encroachment on protected land.

Highway Safety and Traffic Concerns – The Ridgeway is a fast and busy road, with limited visibility and few safe turning points. Increased traffic entering and exiting the proposed site could significantly heighten the risk of accidents, especially given the narrow access points.

Infrastructure Limitations – The area currently has no access to gas or mains sewerage, and the water pressure and electricity supply are already weak. Additional demand would place unsustainable pressure on the limited infrastructure.

Environmental and Wildlife Impact – The field and surrounding hedgerows provide important habitats for local wildlife. Development here would lead to the loss of natural environment and biodiversity, contrary to the principles of environmental protection in the local plan.

Unsuitability of the Site – The field is often waterlogged and lies adjacent to a fast road, making it unsafe and impractical for residential use. Furthermore, the location is distant from local services, schools, and shops, making it unsuitable for long-term habitation.

Safety of School Children – The bus stop near the proposed entrance is used by local school children. The increase in vehicle movements would pose a safety concern for pedestrians in this area.

For these reasons, I respectfully urge the Planning Inspector to refuse this application. The proposal conflicts with Green Belt policy, raises significant safety concerns, and would put unsustainable strain on local infrastructure.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-166.pdf

TLP19- 167 - Alisha James

Respondent: Alisha James

Submission Number:167

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing [redacted] to object to the proposed allocation TLP_01 – Bulls Cross Nursery in the Regulation 19 Traveller Local Plan. I believe this allocation is unsound as it fails the National Planning Policy Framework (NPPF) tests of justification, effectiveness, and deliverability (Paragraph 35) and is inconsistent with national policy. I also wish to endorse the detailed submission made by the Forty Hill and Bulls Cross Study Group.

I am particularly concerned about the effect this proposal would have on our homes and community.

The noise, increased traffic, and disruption during construction and occupation would have a direct and negative impact on our daily lives.

I am also concerned about potential impacts on privacy, lighting, and security for neighbouring residents. The access road is already narrow and used by families, walkers, and horse riders additional vehicle movement would increase safety risks.

The site currently provides a valuable green outlook and acts as a natural buffer between residential properties and the wider countryside. Development here would remove that sense of openness and peace that characterises the area.

Having lived here for 2009 I can say with confidence that this location is unsuitable for the scale and type of development proposed. The Council should instead focus on previously developed or non- Green Belt land, rather than an area of high landscape and heritage value.

Furthermore, development on this site would fundamentally change the character of the surrounding area. The Bulls Cross and Forty Hill area is defined by its rural setting, mature trees, and heritage landscape. Introducing hard surfacing, lighting, and additional traffic movements would urbanise the setting, eroding the distinct semi-rural identity that residents and visitors greatly value.

Drainage and flooding are also major concerns. The land behind our homes becomes saturated during periods of heavy rain, and further hardstanding or loss of green space could increase surface water run-off, posing a risk to nearby properties and local wildlife habitats.

The environmental value of the site should not be underestimated. It supports biodiversity through its trees, hedgerows, and open habitat, which are increasingly rare in this part of Enfield. Losing this space would negatively affect local ecology, contrary to both local and national sustainability policies.

In addition, the proposal fails to take account of the cumulative pressures already affecting our local infrastructure. Roads in this area are narrow, public transport is limited, and local services such as GP surgeries and schools are already under strain. Adding further development here would exacerbate these issues, reducing the quality of life for existing residents and future occupants alike.

Given these factors, I believe the proposed allocation is inappropriate for this location and should be removed from the Traveller Local Plan.

Conclusion:

In conclusion, the proposed allocation TLP_01 – Bulls Cross Nursery is unsound. It is not positively prepared, justified, effective, or consistent with national policy. The site's designation within the Green Belt, its heritage sensitivity, poor accessibility, and the unacceptable impact on local residents and the environment make it wholly unsuitable for development.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-167.pdf

TLP19- 168 - Mrs Ellis

Respondent: Mrs Ellis

Submission Number:168

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Bulls Cross Nursery in the Regulation 19

Traveller Local Plan. The allocation is unsound as it fails the NPPF tests of justification, effectiveness and deliverability (Paragraph 35) and is inconsistent with national policy. I endorse the detailed submission made by the Forty Hill and Bulls Cross Study Group.

1. Green Belt and Local Open Space:

The Bulls Cross site's release lacks a distinct local case. It lies wholly within the Green Belt and designated Local Open Space. Development would reduce openness and harm the rural setting outside the settlement boundary, eroding the established boundaries between Forty Hall, Bullsmoor, the A10 and the Lea Valley. The sustainability Appraisal records "significant negative" effects from loss of recreation space, confirming a clear policy conflict. The Council has not demonstrated exceptional circumstances or a robust Green Belt assessment.

2. Heritage and Conservation:

Heritage considerations were omitted in early site screening, despite adjoining Grade II listed buildings and wall, lies opposite the Grade II Registered Park & Garden (Myddelton House), within the Forty Hill Conservation Area, and an Archaeological Priority Area, therefore undermining transparency and soundness. The proposed works (large community building, loss of trees and railings) and 'active street frontage' would cause severe harm to the conservation area and nearby heritage assets contrary to NPPF policy.

3. Soundness and Process:

The Plan overprovides pitches (approx. +20 / 66% surplus), so this site is unnecessary and unjustified. Separating the Traveller Plan from the emerging Local Plan fragments housing strategy and fails NPPF paras 15, 31 and 62. The evidence base is inconsistent, with limited engagement with Traveller communities in the site screening and selection, breaching the duty to consult in national planning policy. There is no justification for needing small sites like Bulls Cross in the Council's strategic case. Other less constrained sites could meet the Borough's needs without causing such material harm to the Green Belt/open space at Bulls Cross and must be sought through another call

for sites. In addition, other areas of major redevelopment highlighted and currently under consideration in the draft Enfield TLP. It is therefore untimely and inappropriate to be considering such permanent and severe damage to an area of significant protection, sensitivity and historical importance.

4. Deliverability and Fire Safety:

The Council's assumed 8 pitches ignore site shape, access and tree constraints. Spatial analysis by the Forty Hill and Bulls Cross Study Group supports only 3–4 deliverable pitches, below the Council's

own 6-pitch threshold. However, once critical BRE Fire Safety guidance is applied, the site's effective buildable area (0.16 ha) falls well below the 0.3 ha minimum and should be discounted as per other sites due to insurmountable constraints. Independent fire risk advice deems the site unsafe due to the extensive tree line, leading to canopy fire-spread risk and not being deliverable in compliance with BRE Fire Safety Guidance.

5. Trees, Ecology and Root Protection:

Numerous Category A & B protected trees would be lost or compromised, causing biodiversity, visual harm and adverse impact on the Priority Habit, Conservation Area, Green Belt, Metropolitan Open Land and Listed assets. The proposed development would encroach on root protection areas contrary to British Standards and best practice guidance.

6. Accessibility and Sustainability

Access fails 30 mph sightline standards and is impracticable for towing vehicles or fire trucks. The Forty Hill and Bulls Cross Study Group's swept-path analysis evidences how the turning head and entranceway are inadequate and poorly located, conflicting with highways design standards and the TLP's own layout requirements. There will be significant environmental and social harms caused by poor accessibility to facilities and services like a local GP service.

Conclusion:

TLP is not positively prepared, justified, effective or consistent with national policy. It should be removed from the Traveller Local Plan. The Council should instead re-assess need, re-run the site search, undertake full technical appraisals for shortlisted sites, and engage meaningfully at an early stage with communities and statutory consultees before any re-allocation.

TLP19- 169 - Regina Mascarenhas

Respondent: Regina Mascarenhas

Submission Number:169

Submission Date:12/11/2025 09:00 GMT

Land at A10 (Site 3)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land at A10 (Site 3)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Traveller Local Plan – Consultation - Views
(a) Point 7 of the FAQs states:
A balance will need to be struck between meeting the accommodation needs of travellers and the impacts on the wider community.
I do not think that this has been fairly addressed by the Council. The point acknowledges that there is an impact on the wider community and neighbourhood.
Is there a hierarchy which determines whether the accommodation for [redacted] and furthermore whether an existing skate park should be [redacted]
(b) Criteria for identifying suitable sites:
Please could I be provided with information on the other sites that were identified and the criteria used to determine that these were unsuitable
(c) [redacted] Also, it suggests that 15 caravans are to be accommodated in this small area? That number appears to be too large. [redacted]

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-169 (2).pdf
2. TLP19-169.pdf

TLP19- 170 - Michael Ryan

Respondent: **Michael Ryan**

Submission Number:170

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Please find my objections to the planned Traveller Site adjacent to The Ridgeway TLP-03 as follows:
* Greenbelt Land being lost
* Wildlife and Environmental loss
* Increased traffic
* Noise and light pollution
* Roadworks and construction work for utilities
* Site to close to the road

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-170.pdf

TLP19- 171 - David Lauder

Respondent: David LauderCycling UK

Submission Number:171

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound		✓
Complies with the duty to co-operate		

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

Not positively prepared
Not justified
Not effective
* Not consistent with national policy

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

Plan for Land adjacent to Ridgeway (Site 2) is not sound because this site does not provide adequate opportunities for sustainable forms of transport, e.g. walking or cycling. As the site is on the border of the London ULEZ and travellers may drive diesel powered vehicles which may be not be ULEZ compliant it is particularly important that safe cycling routes should be available. The A1005 Ridgeway is a very dangerous road for cycling as much of it has a 50 m.p.h. speed limit

and it is unlit at night. The only other access for cycling would be to the north via a track that leads to the new Northaw Bridleway 017 along Coopers Lane Road which provides a safe cycling route to Potters Bar. This track (show in purple on the attached map) has been in existence since before 1896 and it has an underpass under the M25. Although it is not currently dedicated as a public right of way, it could be made a permissive route with the permission of the land owner which is believed to be London Borough of Enfield. Unfortunately it has recently been rendered impassable due to major landscape change that has taken place since July 2024 as part of the Enfield Agricultural Land Restoration and M25 Screen scheme, 19-02850-FUL. This route should be restored before the site is suitable as a travellers' site. This route should be restored before the site is suitable as a travellers' site.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan		✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-171.pdf

TLP19- 172 - Christian Brailey

Respondent: Christian Brailey

Submission Number:172

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Bulls Cross Nursery (Site 1)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

1. Introduction
We write to make the following representations to Enfield Council's Traveller Local Plan (TLP) as local residents and members of the Forty Hill & Bulls Cross Study Group.

Our representations oppose draft allocation Site TLP_01 Bulls Cross Nursery ("the site"), demonstrate why it is not a suitable or appropriate location for allocation and how the Draft Plan fails the tests of soundness by including it for development.

Independent technical evidence has been included from qualified fire and highway consultants as provided by the Forty Hill & Bulls Cross Study Group.

2. Green Belt and Local Open Space
The site lies entirely within the Green Belt and is designated as Local Open Space under Core Strategy Policy CS34 and DMD71. Although part of the former plant nursery, the land is now undeveloped and has rewilded, visually linking with the Deciduous Woodland to the south of the

site (protected under a blanket TPO at address Winterton, 163 Turkey St). The proposed development would remove existing tree screening and introduce built form into the existing open land which provides a visual and physical break between Forty Hill and Bullsmoor.

National policy (PPTS 2023) classifies traveller sites in the Green Belt as inappropriate development, and personal circumstances or unmet need are unlikely to outweigh Green Belt harm. Changes to Green Belt boundaries for traveller sites may only be made in exceptional circumstances through the plan-making process.

The Council's Exceptional Circumstances Topic Paper (2025) claims that all reasonable alternatives have been explored and that Green Belt release is necessary. However, there is insufficient evidence to show why alternative sites and further additional sites as highlighted in the EnCaf Land Use Working Group's Regulation 18 – Call for Sites V5 FINAL 04112024 document, have been discounted.

The Council relies on two large, strategic sites (Crews Hill and Chase Park) that are acknowledged as suitable for Traveller accommodation, but are not properly assessed for early delivery, a key component of the untimely allocation of Bulls Cross. The council also fails to sufficiently justify the exclusion of Meridian Water (PL5), which given the Council's significant control over the form and phasing of such a large development, and the ability, should it choose, to carefully integrate a small number of permanent Traveller pitches within this strategic site. It therefore cannot be concluded that all alternatives have been exhausted to justify the release of Green Belt land.

The site's development would be an illogical encroachment into the Green Belt, harming openness visually and spatially, contrary to NPPF aims which is neither sufficiently evidenced nor justified, and therefore cannot form a sound basis for the Draft Plan.

3. Heritage and Conservation
The site is located in a highly sensitive historic environment, directly adjoining two Grade II Listed buildings and a Grade II Listed wall. Opposite the site lies the significant Grade II Registered Park and Garden at Myddelton House. It also lies within the Forty Hill Conservation Area and an Archaeological Priority Area.

At the most critical stage of site selection, the Council's site proforma incorrectly recorded 'None' under heritage considerations - the Head of Planning later admitted this significant omission and has since quietly edited in the Regulation 19 Draft TLP. This error materially undermines the validity of the initial site selection process.

Development of the proposed scale and massing would remove historic gates and railings, protected mature trees, and traditional railings, introducing visual harm to the setting of multiple heritage assets. The proposed access location would require alterations to the Grade II Listed wall (Listing entry:1294365) following Swept Path Analysis (Appendix 4).

These impacts are contrary to NPPF paragraphs 199–208 and Local Plan Policy DMD44. The Visual Impact Assessment (Appendix 3) demonstrates the severity of these effects.

4. Accessibility The site's Public Transport Accessibility Level (PTAL) is 0, the lowest possible rating. There are no safe pedestrian routes or public transport options connecting the site to schools, health services or employment areas.

The Council's own Site Selection Topic Paper (3.20) states that sites rejected for housing are "very unlikely to be suitable for Traveller accommodation," yet the Bulls Cross Nursery site previously rejected for housing, is included.

The Housing and Economic Land Availability Assessment (HELAA, 2023) for the main draft of the Enfield Local Plan identifies the same site (CFS284) as potentially developable for 79 homes under the main Local Plan methodology. The land however was judged unsuitable
and was not selected for allocation due to the...

'Isolated inaccessible greenfield site located within the Green Belt. Site is not in a sustainable location. Allocation of the site would not accord with the spatial strategy. Exceptional Circumstances could not be demonstrated on this site in isolation.'

Site Allocation Topic Paper 2024. Evidence to support the Enfield Local Plan. March 2024

This inconsistency undermines the robustness of the evidence base, making the allocation of Bulls Cross Nursery for 8 permanent Traveller pitches inconsistent with LP21 Policy H14 and Policy D3 and does not satisfy the soundness tests of justification and effectiveness under paragraph 35 of the NPPF.

The issues with site allocation TLP_01 reinforce our wider concern that the TLP has not been prepared as an integrated or procedurally consistent part of the Enfield Local Plan, and that decisions about site suitability and capacity have not been applied fairly, transparently or in accordance with the Council's stated methodology.

4. Fire Safety

Since the Grenfell Tower tragedy, national planning practice has evolved to require fire safety consideration at all development stages. The omission of fire safety from the Council's Integrated Impact Assessment is a serious procedural failure and a breach of the Council's duty of care.

A key element of these assessments - consistent with other local authorities' IIAs for their own TLPs - is the consideration of community safety and public health. This includes fire safety, which is a critical concern for the Gypsy and Traveller community. Traveller sites inherently carry high fire loads and are frequently squeezed into unsuitable land, resulting in overcrowded pitches where essential considerations such as caravan spacing, boundary proximity and emergency access are not addressed until too late in the process and potentially compromised. This leads to sites that are unsafe and ultimately unfit for occupation which has been demonstrated in the allocation of the Bulls Cross site.

Enfield Council's IIA omits any reference or assessment of the fire risk, fire safety design standards or emergency access. Representatives of the London Gypsy and Traveller community have identified fire safety as their number one priority, making the Council's omission and lack of consultation even more concerning.

With reference to the Fire Risk Assessment Diagram (Page 4), London Fire Consultants' Fire Risk Report (Appendix 1) and CWB Fire Consultants Fire Risk Letter (Appendix 2) each identify fundamental safety failures. The proposed layout submitted by the Council:

1. Locates all caravans and pitches below and within 3m of extensive mature tree crowns, which creates a continuous canopy forming a "bridging effect" that promotes site-wide rapid fire spread in breach of BRE guidance.
2. Locates pitches only 1.2m from the boundary, in breach of the 3m site boundary buffer to prevent fire spread, in breach of BRE guidance.
3. Ignores the 6-metre clear separation between caravans and instead shares a 3m separation gap in breach of BRE guidance.
4. Locates the entrance to one side and sized too small for emergency vehicle access and creates a serious obstruction risk in an emergency (refer to swept path analysis Ap.4).

5. Locates the turning head 135m into the side and sized too small for emergency vehicles use creating a serious obstruction risk in an emergency (refer to swept path analysis Ap.4).

Both the CWB Fire Consultant's letter and London Fire Consultants report concludes that the site cannot meet basic fire safety design standards and would expose residents to **"unacceptable risk to occupants".**

Once the above considerations are applied to the site - the effective developable area reduces to approximately 0.16 hectares, well below the Council's 0.3-hectare minimum threshold for Traveller site allocation under its 2024 methodology.

This assessment collectively provides a clear and professional assessment of the Fire Safety Risks of the site that must be considered now as insurmountable. These findings make clear that the site is not deliverable even through alternative internal layout configurations. Moreover this form of high level assessment should have taken place during initial site selection and prevented the allocation proceeding not only to Regulation 18 but to Regulation 19 consultation and beyond.

Note - see submitted PDF page 4 containing a plan of the fire risk assessment.

5. Trees, Ecology, and Priority Habitat

The site boundary comprises mature Category A and B trees forming part of a Deciduous Woodland Priority Habitat, with a Tree Preservation Order for all trees (except fruit trees) to the south of the site, and with all trees on and near the site under current TPO assessment by the Council.

The proposed site layout, as illustrated in the Site Assessment Plan below, would require removal of trees and incursions into root protection zones, contrary to BS5837:2012 and NPPF paragraph 180(a).

Loss of these trees would severely diminish biodiversity connectivity, visual screening, and heritage setting. The Visual Impact Assessment (Appendix 3) confirms that any development here would be highly visible and incongruous within the landscape.

Any consideration to remove trees on or near the site to mitigate fire risk must not be pursued as would cause a significant negative impact on the Priority Habitat, Conservation Area and Green Belt and specifically contradicts the existing site screening used by the Council during site selection.

6. Conclusions and Recommendations

For the reasons set out above, that the allocation of TLP_01 is undeliverable and unsound under the NPPF's four tests of soundness. The proposal conflicts with Green Belt, heritage, sustainability and fire safety principles. The assessments and evidence base is outdated, incomplete and procedurally flawed.

Accordingly, the following recommendations are respectfully made to the Inspectorate:

1. TLP_01 (Bulls Cross Nursery) be omitted from the Regulation 19 Traveller Local Plan.
2. The Council re-run its site selection process with updated, evidence-led assessments.
3. Fire safety be formally included into all future Integrated Impact Assessments
4. Traveller provision be planned coherently through the Enfield Local Plan for transparency and soundness.

Only through these steps can the plan be made sound, justified and consistent with national policy.

TLP19- 173 - Andrew Newman

Respondent: **Andrew NewmanForty Hill and Bulls Cross Study Group**

Submission Number:173

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Thank you for asking the Study Group to comment on the above plan, since 1969 the Study Group has been a consultee on matters within the Forty Hill Conservation Area.

The Group, having considered the plan and associated documents find the plan UNSOUND. The rationale for this finding is based on the, in the Study Group's view, flawed site selection of TLP-01 known as "Bulls Cross Nursery". The Group will give specific feedback to the Bulls Cross site but many of the points will apply to the plan in general.

The Group finds the plan unsound for the following reasons:

1) Failure to comply with the London Plan and NPPF (December 2024)

a) LP21 H14 Gypsy and Traveller Accommodation, requires sites to be accessible, sustainable and well connected. A very low PTAL rating of the Bulls Cross site and isolated location do not conform to this policy;

b) LP21 G2, Green Belt, 'exceptional circumstances' have not been demonstrated, and the harm has been underestimated. The Group agree with the topic paper where it cites this site makes a strong contribution to checking the unrestricted sprawl of urban areas and assisting the safeguarding of the countryside from encroachment. Contrary to the topic paper the Group believe this area of land also prevents neighbouring towns from merging into one another, we refer to the Conservation Area Character Appraisal (adopted by the Council), "The Conservation Area has at its spine the historic main road from Enfield Town towards Bulls Cross. Three settlements Forty

Hill … Maidens Bridge….and Bulls Cross are ranged along the road" the Bulls Cross site strongly contributes to preventing the merging of Maidens Bridge into Bulls Cross, an important character trait that should be preserved.

c) LP21 4.14.1 accommodation needs should be catered for. The site is relatively isolated with poor transport links particularly to social infrastructure and healthcare and, in the Groups view, will not contribute to a "wider, inclusive neighbourhood".

d) Alternative sites, the Group believes that alternative sites not in the Green Belt would be available. Of particular note is the site TLP06 Dove Lane, Potters Bar which is adjacent to an existing traveller site, although in an adjacent local authority area, the site topic paper dismisses the site as "would need to be promoted and allocated through Hertsmere Borough Council" which in the groups view does not justify dismissing at this stage and is contrary to NPPF 36a. It is important to note that at one of the TLP consultation events this site was agreed as potentially a better site than those proposed in the reg 19 plan. Other less constrained sites that appear to meet the requirements more sustainably eg TLP02, 04, 05 and 09.

e) NPPF para 188. requires environmental or amenity habitat to be enhanced in plans. This plan does not demonstrate this. To fulfil the pitch quota required will cause the loss of habitat, especially adjacent to Bulls Cross which the forms part of the national forest inventory (London Borough of Enfield Green Belt and Metropolitan Land Study pub 2023, LUC)

f) NPPF para 203, in the Groups view this proposal would harm the conservation area and adjacent heritage assets.

g) NPPF para 16, 36, 63 Developing this plan separately to the Enfield Local Plan precludes inclusion of sites that may become available through that plan making process and inhibit a coordinated housing strategy. This would undermine the soundness criteria identified in the NPPF.

h) NPPF para 109, 112, 115, LP21 T2, requires plans to consider transport and design regarding parking and accessibility. The Study Group has obtained a swept path analysis of the site (TLP01 Bulls Cross Traveller Site_Swept Path Analysis) that shows large vehicles including towed caravans and fire appliances cannot safely enter or turn within the site.

2) Site Specific considerations (TLP-01, Bulls Cross)

a) Failure to consider heritage, the original site proforma stated "none" for "heritage considerations". The Group believe this site was allocated on the incorrect basis of no heritage impact.

b) Impact on heritage assets has not been adequately assessed: the site not only sits within the Green Belt but also within the Forty Hill Conservation Area. Within circa 500 metres of this site there are two registered gardens (Forty Hall and Myddelton House), one scheduled monument (Elsyng Palace), various statutory designated grade 2 listed assets including Maidens Bridge, Wall adjacent to site, Myddelton House, The Gate House, Garnault, Maidens Bridge Cottages, New River bridge plus several undesignated heritage assets. Impact on these assets would have varying degrees of harm. The Conservation Area Character Appraisal summarises key characteristics that give the Conservation Area
"special interest" one of which is "The presence of extensive open land. This helps preserve the individual nature of each settlement and gives the historic estates and hamlets an attractive landscape setting". The Group notes the consultation indicative scheme shows the need to place an 18m long building against the pavement, adversely impacting this special interest and openness.

c) Impact on ecology and conservation: the Group do not believe site selection has considered impact on green assets on the site. Several mature and semi-mature trees (category A or B) will be adversely impacted. The indicative design shows the built form needing to breach root protection zones and, particularly to the road frontage, requires tree removal. This area falls within the national forest inventory (see 1(e) above). To mitigate this harm (eg avoid root protection zones, tree felling etc.) would dismiss the site from selection by way of reducing the useable area considerably. There are potential protected species (not least bats) in the hedgerows adjacent.

d) Fire safety: a study of Draft Traveller Local Plans from other authorities include fire safety as a material consideration during the selection in Integrated Impact Assessments under the heading *"community safety and public health"*. Fire risk is a key community safety and public health risk and therefore factor when considering sites for TLPs. The Group has sought initial professional advice on this matter which concludes it would be an unacceptable fire risk as the site *"cannot meet basic fire safety design standards"* and be an *"unacceptable life safety risk"* (see London Fire Consultants Report dated 31-10-25 and CWB Fire Consultants letter *"Traveller Local Plan Regulation 19 Consultation – Site Allocation TLP 01 (Bulls Cross Nursery"*) . The reasons for this risk level is twofold, potential fire spread and poor access for emergency vehicles. Inadequate separation, tree canopy intrusion and potential obstruction in an emergency create a higher risk development. In the Group's view for this reason alone the site should be dismissed from the selection process. It is Group's understanding that the Gypsy and Traveller community have identified fire risk as their number one priority.

For the above reasons the Group find the current Enfield TLP not compliant with NPPF para 36 and therefore
unsound and should not be submitted. We would ask the Inspector to instruct the Council to:

1) Reconsider and modify the site selection criteria/ pro-forma particularly with respect to community safety and public heath (including fire safety);
2) Re-appraise site TLP-01 with a more considered impact assessment on safety, the green belt, ecological impact and conservation area harm;
3) Re-appraise sites not included (ideally brownfield sites) and those without adequate grounds for dismissal (eg TLP06)
4) Apply a coherent strategy on housing supply by integration of the TLP into the ELP;

We ask that you please keep the Group up to date with any further developments on this matter.

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-173 CWB Fire Consultants - Fire Safety Letter.pdf
2. TLP19-173 London Fire Consultants - Fire Safety Risk Report_r.pdf
3. TLP19-173 Forty Hill and Bulls Cross Study Group - email.pdf
4. TLP19-173 Forty Hill and Bulls Cross Study Group -letter 5.11.25 (1 of 7)_Redacted.pdf
5. TLP19-173 TLP01_Bulls Cross Traveller Site_Combined Site Assessment_r.pdf
6. TLP19-173 TLP01_Bulls Cross Traveller Site_Fire Risk Assessment_r.pdf
7. TLP19-173 TLP01_Bulls Cross Traveller Site_Swept Path Analysis_r.pdf

TLP19- 174 - Laura Wurzal

Respondent: Laura Wurzal

Submission Number:174

Submission Date:12/11/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Chapter 4, Site Allocations

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I am writing to object to the proposal to have a site for Travellers along The Ridgeway, Enfield EN2, near Botany Bay.
[redacted]. This land has always been part of the Greenbelt and in recent years has been a paddock where horses have been kept. It is more suitable to farm animals and wildlife. The land is boggy, especially when it rains, and there is only one bus, the 313 that comes every 20 minutes., so the families there will be isolated, as it is not close to Enfield town or any amenities. There are no utilities there, no gas, sewers, and the water pressure is quite low and the electricity supply is weak.

The traffic on the Ridgeway has increased in recent years and the land is adjacent to this busy road. The entrance to it involves a very awkward turning, so is a hazard if there are any young children and generally, the road is not safe around there.

I feel that having that land for travellers will increase traffic, noise pollution and there will be accidents that will cause delays to the flow of traffic along the Ridgeway. I have looked at the plans and seen that there are more suitable areas near town centres and that other sites like this one on the Ridgeway have been discarded as they were not suitable.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-174.pdf

TLP19- 175 - Brian Jones

Respondent: Brian Jones

Submission Number:175

Submission Date:12/11/2025 09:00 GMT

Bulls Cross Nursery (Site 1)

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant	✓	
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
* Not justified
* Not effective
Not consistent with national policy

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This is unsound and not an appropriate area to allow as a travelers site. It is a family orientated area with children and adult sports, dog walkers and after discussions with neighbours, the general opinion is most people will feel very unsafe and anxious about walking in Bulls Cross.

If you wish to make a separate representation, relating to legal compliance, soundness or the duty to cooperate in relation to the accompanying Integrated Impact Assessment (IIA), please make them here:

All the above and my comments below .
Green belt and local open space concerns reduce green belt openness and materially harm the open/rural setting outside of the established settlement boundary.

Heritage and conservation failings not giving sufficient materials weight to heritage considerations, Grade 11 listed properties, including Myddelton House) within 250m of many listed assets, within Forty Hill conservation area and an archaeological priority area.

Trees, ecology and root protection numerous category A & B protected trees (oak, ash, sycamore) with significant group value, bound the site; proposed pitches, access, building and hard standing encroach to root protection areas, contrary to British Standards.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

* No, I do not wish to participate in hearing season(s)
Yes, I do wish to participate in hearing season(s)

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No
Submission of the Plan	✓	
Start of the examination	✓	
Schedule of Main modifications stage (following hearings)	✓	
Publication of Inspector's Report	✓	
Adoption of Traveller Local Plan	✓	

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-175 email.pdf
2. TLP19-175.pdf

TLP19- 176 - Lily Peters

Respondent: Lily Peters

Submission Number:176

Submission Date:12/11/2025 09:00 GMT

Traveller Local Plan Regulation 19

Comment Number: 1

Which document or part of the document are you commenting on?

* Traveller Local Plan document as a whole
Integrated Impact Assessment
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A paragraph or set of paragraphs in the Traveller Local Plan
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Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

This response is submitted in respect of the Traveller Local Plan (TLP) Regulation 19 Consultation published by the London Borough of Enfield. It relates to matters of legal compliance and soundness under the National Planning Policy Framework (NPPF, December 2023) and relevant case law.

1. Legal Compliance and Procedural Fairness

The Traveller Local Plan is not legally compliant because:

- The Gypsy and Traveller Accommodation Assessment (GTAA, 2024) has not been t transparently tested or independently verified. NPPF paragraph 31 requires plans to be underpinned by relevant and proportionate evidence. This test has not been met.
- The consultation timetable (Regulation 19 Plan Programme, p.7 TLP Pre-Consultation Engagement…) compresses decision-making and undermines the requirement for early and meaningful engagement under NPPF paragraph 16(c).
- The Equalities Impact Assessment does not adequately balance the needs of traveller and settled communities. The Council is under a duty to ensure compliance with the Public Sector Equality Duty (Equality Act 2010), which is also reflected in NPPF paragraph 32.

2. Unsoundness – Failure Against NPPF Paragraph 35 Tests

a) Not Positively Prepared. The GTAA identifies a need for 30 permanent pitches and 1 transit site TLP Pre-Consultation Engagement… However, NPPF paragraph 61 requires local housing needs (including for travellers) to be assessed and planned for in full. The strategy does not demonstrate that the need can realistically be met within deliverable timescales.

b) Not Justified NPPF paragraph 31 requires evidence to be adequate and proportionate. The site selection process (p.5 TLP Pre-Consultation Engagement…) has not tested reasonable alternatives transparently, contrary to NPPF paragraph 35(b). Land adjacent to the Ridgeway has been advanced without proper comparative assessment.

c) NPPF paragraph 35(c) requires plans to be deliverable over the plan period. The reliance on "subject to Council decision" allocations (Chase Park / Crews Hill – p.5 TLP Pre-Consultation Engagement) introduces fundamental uncertainty. No evidence is provided of landowner willingness, viability, or infrastructure delivery.

d) Not Consistent with National Policy

- Green Belt Harm: Sites such as The Ridgeway lies within and adjacent to the Green Belt. NPPF paragraphs 137–151 establish that Green Belt boundaries should only be altered in exceptiona circumstances and that inappropriate development is, by definition, harmful. Case law (Timmins v Gedling BC [2015]; Redhill Aerodrome Ltd v SSCLG [2014]) confirms this principle. No "very special circumstances" have been demonstrated.
- Sustainability: NPPF paragraphs 8, 104 and 105 require planning to promote sustainable patterns of development. The proposed sites are remote from essential services, public transport, and employment opportunities, making them inherently unsustainable.
- Consistency with Local Plan: The emerging Enfield Local Plan emphasises protecting open spaces, biodiversity, and landscape character (NPPF paragraph 174). The TLP allocations undermine these strategic objectives.

3. Deliverability and Infrastructure Concerns

- NPPF paragraph 20 requires plans to make provision for infrastructure, transport, community facilities, and services. The proposed allocations have not been tested against realistic capacity assessments.
- Highways, utilities, and emergency access constraints have not been resolved. This risks rendering the allocations undeliverable.

1. Conclusion

This Regulation 19 Traveller Local Plan is not legally compliant and unsound because it:

- Fails the statutory tests of soundness under NPPF paragraph 35.
- Relies on an incomplete and insufficiently robust evidence base (NPPF para 31).
- Conflicts with national Green Belt protections (NPPF paras 137–151) and sustainability requirements (NPPF paras 8, 104, 174).
- Risks breaching equalities legislation and procedural fairness (NPPF para 32).

Requested Action

We respectfully request that Enfield Council:

1. Withdraw the current draft TLP and reassess the evidence base.

2. Reconsider site selection through a transparent process that tests reasonable alternatives.
3. Ensure compliance with the NPPF, case law, equalities legislation, and the wider Enfield Local Plan before re-publication.

Until these issues are resolved, the plan cannot lawfully or soundly proceed to adoption.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-176.pdf

TLP19- 177 - Frank & Liz Greene

Respondent: Frank & Liz Greene

Submission Number:177

Submission Date:12/11/2025 09:00 GMT

3 Enfield's Traveller Needs

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
* Integrated Impact Assessment
A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Section 3

Do you consider Enfield's Traveller Local Plan:

	Yes	No
Is legally compliant		
Is sound	✓	
Complies with the duty to co-operate	✓	

If you think Enfield's Traveller Local Plan is not sound, please indicate the reason(s) why by ticking the appropriate box(es) below:

* Not positively prepared
Not justified
* Not effective
Not consistent with national policy

Do you wish to be notified further about the Traveller Local Plan Examination process, at any of the following stages?

	Yes	No

Submission of the Plan	✓
Start of the examination	✓
Schedule of Main modifications stage (following hearings)	✓
Publication of Inspector's Report	✓
Adoption of Traveller Local Plan	✓

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-177.pdf

TLP19- 178 - Natalie Collins

Respondent: Natalie Collins

Submission Number:178

Submission Date:03/12/2025 09:00 GMT

Land adjacent to Ridgeway (Site 2)

Comment Number: 1

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
A particular section of the Traveller Local Plan
* A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please specify the section, policy, paragraph(s) or site allocation / proforma you're commenting on (number or name):

Land adjacent to Ridgeway (Site 2)

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

I would like to formally object to the proposed plan Traveller Site Section 19 Adjacent to The Ridgeway TLP-03 The basis for my objection is as follows;

Firstly my understanding is this is Greenbelt Land. There must be multiple, more suitable locations that would not interrupt the only protection this land has. Other sites have been discarded and deemed unsuitable for the exact same issues as The Ridgeway site.

Increased traffic on this particular part of The Ridgeway will be a hazard to all road users, there is a school nearby and this location for 12 plus additional families will generate a disproportionate amount of traffic for the area, having a significant impact of existing residents who should have the right to peace and enjoyment of there existing homes.

The bus stop right outside the proposed site could be a danger to children unless you plan to have a restriction of vehicles on site? If not vans, trucks, lorry's could all be coming and going at all times of day and night, causing danger and risk to local community.

My understanding is there are no utilities at the field (no gas, no sewers, no internet, low water pressure and weak electricity supply). This makes this site wholly unsuitable for multiple families to live.

I would urge the authorities involved to also consider the detrimental impact of wildlife, has a badger & bat inspection been carried out? This is an extremely rural location, rich in wildlife and therefore will certainly cause harm to the environment, animals.

I have grave concerns for light, noise pollution not only to residents but again the wildlife that currently will live and thrive in this rural location.

It is extremely upsetting, distressing to think how this beautiful environment and the wildlife that lives there could be destroyed by this decision, devastating the local community and causing significant harm to the mental health of and well being of existing residents.

I strongly oppose and object to this plan.

Please upload any supporting documents here. Do not include any signatures or other personal data.

1. TLP19-178.pdf

TLP19- 180 - Piotr Behnk

Respondent: **Piotr BehnkNatural England**

Submission Number:180

Submission Date:12/02/2026 09:00 GMT

IIA

Comment Number: 2

Which document or part of the document are you commenting on?

Traveller Local Plan document as a whole
Integrated Impact Assessment
* A particular section of the Traveller Local Plan
A specific site or allocation in the Traveller Local Plan
A specific policy in the Traveller Local Plan
A paragraph or set of paragraphs in the Traveller Local Plan
Something else...

Please give details of why you consider Enfield's Traveller Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support Enfield's Travellers Local Plan on the basis that you consider it is sound, legally compliant and meets the duty to cooperate, please also use this box to set out your comments.

Many thanks for consulting Natural England regarding the draft Traveller Local Plan and apologies for the delay is responding.

Given the limited scope of the three allocated sites within this plan I've taken a look and can confirm that Natural England would not have any concerns regarding any of the sites themselves.

I've also looked at the HRA and can confirm that as per paragraph 6.23 that we would welcome the additional wording within the Traveller LP and the inclusion of the Recreation Mitigation Strategy references.

It appears that two of the sites do fall within the 6.2km Epping Forest SAC Zone of Influence (ZoI) however it is acknowledged within paragraph 6.20 of the HRA that the requirement for developer contributions should be applied to all new development within the ZoI, including any permanent traveller pitches.

Please accept these comments as our formal response however if there's anything further you'd need do let me know.

Please set out the modification(s) you consider necessary to make Enfield's Traveller Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. (Please note that non-compliance with the duty to co-operate is incapable of

modification at examination.) You will need to say why each modification will make Enfield's Traveller Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

I've also looked at the HRA and can confirm that as per paragraph 6.23 that we would welcome the additional wording within the Traveller LP and the inclusion of the Recreation Mitigation Strategy references.

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