

Enfield Traveller Local Plan

Duty to Cooperate Statement

Report on Enfield Council's compliance with the Duty to Cooperate on the preparation of the TLP – Regulation 19 stage

September 2025



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1 Introduction

Purpose of this Statement

- 1.1 This Duty to Cooperate Statement is published alongside the Enfield Traveller Local Plan (TLP) Regulation 19 consultation and provides a summary of Enfield Council's engagement with Duty to Cooperate partners as part of the preparation of the Enfield TLP to date. This statement demonstrates compliance with the Duty to Cooperate requirement set out by the legislative and policy frameworks, detailed further in Section 2 below.
- 1.2 The Duty to Cooperate was introduced by the Localism Act 2011 and further set out in section 33A of the Planning and Compulsory Purchase Act 2004. This placed a legal duty on local planning authorities in England to engage constructively, actively and on an ongoing basis with prescribed bodies on the preparation of a Local Plan - particularly to address strategic cross boundary matters. The Duty to Cooperate, as a legal test, has now been rescinded by the Levelling Up and Regeneration Act 2023. This has replaced the legal test with a soundness test (in national policy). This paper covers both aspects, as a legal test and as a soundness test, and demonstrates that the London Borough of Enfield ('Enfield Council' or the 'Council') has worked effectively with others to address cross-boundary strategic issues; in this case, planning for Traveller sites.
- 1.3 In accordance with National Planning Policy Framework (NPPF) (December 2024, paragraph 63)¹ and Government's Planning Policy for Traveller Sites (December 2024)², the Council is required to assess and plan for the needs of the travelling community as part of its plan-making process. A further requirement is set out in the adopted 2021 London Plan under Policy H14. This report outlines how the Council has prepared the proposed Enfield TLP Regulation 19 Submission document in accordance with the Duty to Cooperate. It sets out the Council's engagement approach with prescribed bodies on this specific strategic matter.

Strategic Issue: Meeting Traveller Accommodation Needs

- 1.4 The Council published its initial evidence of need within the 2020 Gypsy and Traveller Accommodation Need Assessment (GTANA)³. It identified a need for a minimum of 15 permanent pitches by 2025 with a further 6 permanent pitches by 2036. It did not identify a need for sites for Travelling Showpeople. Based on evidence from the 2020 GTAA and the ongoing need for transit provision, there

¹ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

² https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

³ https://www.enfield.gov.uk/_data/assets/pdf_file/0022/45382/gypsy-and-traveller-accommodation-needs-assessment-2020-Planning.pdf

is a need for permanent stop over locations to accommodate at least 15 caravans at one time. Policy H10 of the Enfield Local Plan (ELP) (submission draft, 2024) refers to these requirements.

- 1.5 The GTATA was updated in 2024⁴, to extend the assessment period covered, and to account for the updated NPPF (2024), and the associated change in the definition of ‘Traveller’. This identified an overall need for 30 permanent pitches across the borough over the period 2020/21 to 2040/41. Of this need, 16 pitches are needed in the first five years (2020/21 to 2024/25) and 14 over the remaining period to 2040/41. There is also a need for Transit provision to accommodate at least 15 caravans at any one time. The Enfield GTANA 2024 has not evidenced any need for additional Travelling Showperson plots in the borough.

Related Documents

Published Evidence

- 1.6 This report should be read alongside the following documents, submitted as part of the Council’s Enfield Local Plan examination which can be viewed here https://www.enfield.gov.uk/data/assets/pdf_file/0031/97465/Document-library-6-June-Planning.pdf:
- a) **SUB14a**: ELP Duty to Cooperate Statement and associated SoCG (August 2024)⁵.
 - b) **E7.9**: ELP (Regulation 24); LBE’s Response to IN7 – Duty to Cooperate⁶.
 - c) **E7.9.2**: Enfield TLP Log of Engagement under the Duty to Cooperate⁷.
- 1.7 This statement will be reviewed and updated accordingly, as the Enfield TLP is progressed through the plan process, to ensure it reflects the ongoing engagement and cooperation prior to the submission of the TLP for examination to the Secretary of State.

Consultation Statement

- 1.8 The Council has also prepared a separate TLP Consultation Statement reflecting the Regulation 18 stages of the plan process, documenting how the Council has undertaken public consultation during the plan-making process and how consultation responses have been used to inform the preparation of the Regulation 19TLP.

⁴ https://www.enfield.gov.uk/data/assets/pdf_file/0021/63417/Gypsy-and-traveller-accommodation-needs-assessment-Planning.pdf

⁵ https://www.enfield.gov.uk/data/assets/pdf_file/0021/64452/Duty-to-Cooperate-Statement2-Planning.pdf

⁶ https://www.enfield.gov.uk/data/assets/pdf_file/0033/93786/E7.9-Planning.pdf

⁷ https://www.enfield.gov.uk/data/assets/pdf_file/0032/93785/E7.9.2-Planning.pdf

Statements of Common Ground

- 1.9 In addition to the Duty to Cooperate, the National Planning Policy Framework (NPPF) sets out requirements for the preparation of Statements of Common Ground (SoCG) to support the plan-making process. These statements serve as written records of the progress made by strategic plan-making authorities in addressing strategic cross-boundary issues during the development of Local Plans. They demonstrate where effective cooperation is occurring throughout the statutory plan preparation and adoption process, and they identify both areas of agreement and, where applicable, areas of disagreement. Any issues related to traveller needs (discussed as part of the process of preparing the Enfield Local Plan) are set out in existing ELP documentation, submitted as [SUB14a](#).

2 Legislative and Policy Context

Localism Act 2011

- 2.1 The Localism Act 2011 introduced the Duty to Cooperate by way of amendments to Section 33A of the Planning and Compulsory Purchase Act 2004. This requires that local authorities must cooperate with prescribed bodies to maximise the effectiveness of local plans. They must engage constructively, actively and on an ongoing basis on strategic matters.
- 2.2 For the purposes of the Duty to Cooperate, a strategic matter is defined as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- 2.3 The preparation of Local Plans is governed by the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Regulations set out a list of prescribed bodies that the Duty to Co-operate applies to, and include:
- Environment Agency
 - Historic England
 - Natural England
 - Mayor of London (Greater London Authority (GLA))
 - Civil Aviation Authority
 - Homes and Communities Agency (now Homes England and Regulator of Social Housing)

- Each Primary Care Trust established under the National Health Service Act 2006 (Integrated Health Board, which have (in Enfield) replaced the Clinical Commissioning Group)
- National Health Service Commissioning Board
- Office of Rail Regulation (now Office of Rail and Road)
- Each integrated transport authority (Transport for London - TfL)
- Each highway authority (National Highways, TfL and LB Enfield)
- Each local enterprise partnership (LEP)
- Marine Management Organisation

National Planning Policy Framework (NPPF, 2024)

- 2.4 The National Planning Policy Framework (NPPF) (2024) sets out the Government's planning policies for England and how they should be applied. The NPPF includes policies on plan-making, including the Duty to Cooperate, under paragraph 24.
- 2.5 NPPF paragraphs 24–27 emphasise the need for local planning authorities to maintain effective cooperation during the plan-making process. It provides that this is integral to the production of a sound plan, one that is positively prepared and with a justified strategy for managing growth and meeting identified needs for development, including infrastructure. Cooperation can help to inform considerations as to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 2.6 NPPF paragraph 27 highlights that statements of common ground should be prepared and maintained to support the plan-making and examination process. These can help to document the cross-boundary matters being addressed by the plan and assist progress in cooperating to address these.

National Planning Practice Guidance (NPPG) on Duty to Cooperate

- 2.7 The NPPF is accompanied by the National Planning Practice Guidance (NPPG) which provides further information to support the implementation of the national policies. The following guidance is relevant to the approach taken by Enfield Council:
- [Paragraph: 033 Reference ID: 61-033-20190315](#): *The duty to cooperate applies in London, and other combined authority areas. Within these areas local planning authorities are required to cooperate with each other, county councils, other local planning authorities outside the combined authority area, and prescribed public bodies. The degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy.*
- [Paragraph: 075 Reference ID: 61-075-20190723](#): *The level of co-operation is expected to be proportionate to the task and should not unduly delay the plan review. For example, an authority may set out how they propose to review the policies in their plan and when and how neighbouring authorities*

and prescribed bodies will be engaged. A record of how authorities will be engaged in the review of plans and of where agreement has or hasn't been reached on the need to update a policy or policies can be set out in the Statement of Common Ground.

Planning Policy for Traveller Sites (PPTS, 2024)

- 2.8 The National Planning Policy for Traveller Sites (published in 2015 and updated in December 2024)⁸, which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community. It is noted in the most recent policy update that the definition of Gypsies and Travellers has been updated to include those that no longer travel.

Relationship with the London Plan (2021)

- 2.9 The TLP must be in general conformity with the adopted 2021 London Plan. Specifically, Policy H14 'Gypsy and Traveller Accommodation' requires that boroughs actively plan for Traveller's accommodation needs as part of the development plan process; while it specifically requires for ten-year targets to be included in development plans, the Enfield TLP has included a 15-year assessment of need, which consequently also updates the associated Policy H14 London Plan table 4.4 needs figures.
- 2.10 The London Plan also commits to updating the evidence base and states the Mayor will initiate and lead a London-wide Gypsy and Traveller Accommodation Needs Assessment⁹. This work is currently underway to inform, with the findings likely to be published later in the 2025.
- 2.11 Enfield Council has engaged with the GLA producing the London wide GTANA, which is recognised within the Enfield Reg 19 TLP (submitted in evidence as [HNE4](#)). Enfield officers have been part of a steering group which meet regularly to discuss the assessment as it evolves, including contributing to the methodology as it evolves.

Relationship with ELP (Submission ELP, 2024)

- 2.12 The Enfield Local Plan (ELP) sets out the amount and types of new development required in the Borough to meet the needs of local residents and businesses and allocates sites to accommodate this growth. The ELP is anticipated to be adopted before the TLP, having been submitted for independent examination in August 2024. The ELP sets out in draft Policy H10 (Traveller Accommodation) the Council's strategic commitment to meeting the

⁸https://assets.publishing.service.gov.uk/media/675ac5257e419d6e07ce2bb2/Planning_policy_for_traveller_sites_2024.pdf

⁹ <https://www.london.gov.uk/md2908-london-gypsy-and-traveller-accommodation-needs-assessment>

identified Traveller accommodation needs through preparation of a separate Traveller Local Plan. Draft ELP Policy H10 also sets out a series of assessment criteria against which proposals for transit pitch provision, permanent pitch provision and plots for Travelling Showpeople will be assessed. The policy criteria cover:

- Location and connectivity;
- Impact on the environment and heritage;
- Occupational suitability;
- Safe access;
- Integration with surrounding area; and
- On site utility provision.

3 Demonstrating Compliance with the Duty to Cooperate

- 3.1 This section details how the Council has fulfilled the Duty to Cooperate through cooperation with prescribed bodies up to the current stage of the plan-making process. The Council has taken a proportionate approach, corresponding with relevant organisations on its approach to identifying and addressing strategic traveller accommodation needs throughout the preparation of the Enfield TLP.
- 3.2 Duty to Cooperate discussions focussed on ensuring relevant authorities were aware of the emerging Enfield TLP at each stage, and whether relevant neighbouring authority areas were able to accommodate any of Enfield's traveller accommodation needs.
- 3.3 Enfield Council's key Duty to Cooperate Partners have been previously set out in [E7.9](#). This includes the immediate adjoining and neighbouring boroughs (including outside of London where relevant), as well as those which broadly aligned to Enfield's Housing Market Area (HMA) and/or Functional Economic Market Area (FEMA).
- 3.4 As stated in the ELP E7.9 evidence submission, the FEMA was updated in 2023 to better reflect the current economic linkages; this resulted in the exclusion of the following neighbouring authorities: London Borough of Brent, Harlow District Council, Uttlesford District Council, and the London Borough of Newham. However, to ensure consistency, Enfield Council continued to liaise and follow-up matters with these authorities. The Council cooperated with the following authorities :
 - Barnet
 - Brent
 - Broxbourne
 - East Herts
 - Epping Forest
 - Essex County Council
 - Hackney
 - Haringey
 - Harlow
 - Hertsmere

- Newham
- Redbridge
- Uttlesford
- Waltham Forest
- Welwyn Hatfield

Mayor of London and the Greater London Authority

3.5 Enfield Council has worked closely and in partnership with the Mayor of London and the Greater London Authority (GLA) steering group, which includes Transport for London (TfL), specifically around the needs assessment.

Neighbouring Local Authorities

3.6 A record of specific engagement with prescribed bodies related to the TLP is included in the following documents:

- **E7.9.2** is published as part of the ELP examination library and sets out a log of correspondence between parties, evidencing liaison at each TLP stage, summarised in the table below.
- **Appendices of this DtC Statement** include the key correspondence letters issued at each stage.
- **SUB14a ELP Duty to Cooperate statement and corresponding Statements of Common Ground.** Any traveller accommodation matters are amalgamated into this wider ELP DtC Statement and associated SoCG with authorities (submitted as SUB14a August 2024). There were very few, mostly reiterating that other boroughs were not able to accommodate Enfield’s traveller accommodation needs.

3.7 Specifically, the Council has corresponded at each of the following stages:

| Date | Purpose of Engagement | Outcome | Evidence Link |
|---------------------------------|---|---|---------------|
| January 2021 | Duty to cooperate letters were issued as part of the 2021 Reg 18 for the ELP, and expressly sought to discuss traveller pitch needs. | <ul style="list-style-type: none"> • All seven neighbouring authorities responded in 2021, to confirm they could not assist with meeting the Council’s housing needs. | Appendix 1 |
| 29 th September 2023 | <p>The TLP Consultation - Issues and Options version was consulted upon between September and November 2023. As part of that consultation, a Duty to Cooperate letter was sent out to all neighbouring authorities to ascertain if Enfield’s traveller accommodation needs could be met elsewhere.</p> <p>A call for sites exercise was also undertaken as part of this consultation.</p> | <ul style="list-style-type: none"> • No positive confirmation was received regarding accommodating Enfield’s unmet needs. Boroughs cited their own challenges in meeting housing targets and gypsy and traveller pitch needs. Responses highlight the ongoing pressures faced by neighbouring authorities in addressing their own traveller needs and reinforced the need for the Council to address its identified traveller accommodation needs within its own administrative boundary and planning framework. | Appendix 2 |

| | | | |
|---------------------------------|---|---|------------|
| | | <ul style="list-style-type: none"> No Duty to Cooperate issues or proposed modifications raised by prescribed bodies. 2 sites were received as part of the call for sites. | |
| 24 th October 2023 | Enfield Council wrote to neighbouring authorities as part of the Duty to Cooperate discussions seeking assistance regarding unmet need. | <ul style="list-style-type: none"> No positive confirmation was received regarding accommodating Enfield's unmet needs. | Appendix 3 |
| 24 th September 2024 | Letter issued to inform neighbouring boroughs that Enfield Council has published its Draft TLP part 2 for Regulation 18 consultation, running from 23rd September to 4th November 2024. | <ul style="list-style-type: none"> Only Hertfordshire County Council responded to state they had no comments. No other responses received from prescribed bodies. Other representations responses received from the following organisations: the Canal & River Trust, Comer Homes (via Savills), Edmonton & Winchmore Hill Conservative Association, Enfield RoadWatch, Environment Agency, Essex County, Hertfordshire County Council, Historic England, the Greater London Authority, Natural England, the London Borough of Redbridge and Tottenham Hotspur Football Club. The detail of these responses is currently being considered by the Council as part of the Reg 19 drafting of the TLP process and will be summarised as part of the corresponding Consultation Statement. | Appendix 4 |
| 14 th February 2025 | Follow up correspondence regarding unmet need (to non-responding authorities), explaining that the Council is proposing to release sites from the Green Belt and stressing the importance of understanding neighbouring authorities' capacity to assist before proceeding further. The letter also reminded recipients of previous consultation engagement and outreach efforts it had made in October 2023 and September 2024, asking for responses by 7 March 2025. | <ul style="list-style-type: none"> All authorities responded confirming they are unable to meet Enfield's unmet need. | Appendix 5 |

4 Conclusion and Next Steps

4.1 Through meetings, formal representations to the Regulation 18 draft TLP and correspondence responding specifically to unmet need requests, it has been established that other authorities were not able to accommodate Enfield's unmet traveller accommodation needs.

- 4.2 No cross-boundary issues have been raised by neighbouring authorities with regards to pitch provision or unauthorised encampments. Other London boroughs have broadly welcomed Enfield's approach to meet its identified needs within the borough.
- 4.3 This Duty to Cooperate Statement has confirmed how the Council has maintained ongoing engagement with prescribed Duty to Cooperate partners and other bodies during the preparation of Enfield TLP to date.
- 4.4 The TLP Regulation 19 is due out for consultation September 2025. As necessary, the Council will continue to engage and jointly work with other authorities and prescribed bodies, including the GLA to ensure that it's Duty to Cooperate is met.

5 Appendices

Appendix 1: January 2021 Letter Regarding the Reg 18 for the Enfield Local Plan



Sent via email

Please reply to:

E-mail:

Phone:

Textphone:

Fax:

My Ref:

Your Ref:

Date:

020 8132 1714

Duty to Cooperate – unmet needs

7 January 2021

Enfield's Local Plan

The London Borough of Enfield is currently progressing work on its new Local Plan which will cover the period up to 2039. We have been actively engaging with all of our neighbours and stakeholders through the Duty to Co-operate for several years and now wish to deepen this process as we consider how Enfield will meet its own identified housing and employment needs.

Our evidence base production has progressed significantly in the last few months and we have identified that we will not be in a position to meet all of our housing and employment needs in the borough. As you will be aware, Enfield is a constrained borough with around 40% of its area covered by Green Belt and a further 300 hectares (5%) designated as Strategic Industrial Location (SIL). Other significant constraints such as SSSI, MOL, Registered Parks and Gardens and Ancient Woodland affect large areas of the borough. These constraints affect our land supply and our ability to meet the borough's growth requirements. The council is continuing to use its best efforts to meet its needs within the urban and brownfield areas of the borough but unfortunately the supply evidence is indicating that it will not be able to do this, despite maximising the urban site pipeline and increasing supply through intensification and creative design solutions.

The purpose of this letter therefore is to formally ask if your council would be in a position to assist Enfield in meeting some or all of its unmet employment and housing requirements.

Executive Director Place
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY

www.enfield.gov.uk

If you need this document in another language or format contact the service using the details above.

To assist you in coming to view on Enfield's request I have set out below a summary of the evidence and scale of shortfall relating to the housing and employment requirements:

Housing

Enfield's housing requirements are set by the London Plan. The adopted 2016 London Plan will shortly be out-of-date and is due to be replaced by the new London Plan. The latest version (Published London Plan (Dec 20)) has a housing requirement for Enfield of 1,246 dwellings per annum which equates to a total of 18,690 over a 15 year plan period. Our current urban and brownfield site pipeline is not sufficient to meet this requirement and we currently estimate we could be up to 4,000 dwellings short of the target over the plan period.

The council does have a supply of sites in Green Belt/MOL areas that might potentially be used to meet housing needs based on the 1,246 target, although there is further work to be done on this. However, we recognise the very strong policy constraints relating to use of Green Belt/MOL land to meet unmet housing need and are adopting a 'no stone unturned' approach before turning to this supply. This approach includes establishing whether Duty to Co-operate partners would be able to assist us in meeting our unmet housing need.

It is important at this point to note that the Published London Plan target is not adopted and is still subject to considerable uncertainty as a result of discussions between the Mayor and Secretary of State. Furthermore, the targets in that plan are only applicable for 5 years from the date of adoption and any new London Plan that is developed will be expected to be based on the new Standard Methodology (December 2020) for calculating housing need. Applying the methodology to Enfield alone would leave us with a housing need of up to 65,955 new homes over a 15 year plan period. It is clear that we would be unable to provide for this level of need even if we were to use our entire site supply (including Green Belt/MOL and other policy constrained sites).

Employment

The council's employment evidence indicates that we have a need in the borough for 53ha of additional industrial/distribution land. Utilising intensification and new employment sites in urban areas we estimate we can provide for 30ha of this. This leaves us with a significant unmet industrial/distribution need of around 23ha.

The council does have a very small supply of sites in the Green Belt/MOL that could potentially be used for industrial/distribution uses but this is not expected to make significant in-roads to the 23ha unmet need. We are seeking your assistance with meeting this need.


We are expecting to publish the next stage of our local plan in summer 2021 and thus there is some degree of urgency for us in understanding whether or not your council would be in a position to take some of Enfield's unmet housing and employment needs. **Accordingly, I would be grateful for a response to this letter by the end of January 2021.**

In the meantime, if you feel you need more information, including detailed evidence of our supply pipeline and constraints, or would like to discuss the matter with us before formally responding please let me know as soon as possible so that we can arrange a meeting in early January.

For your information, a similar request has also been sent to all neighbouring authorities and other authorities within our Housing Market Area and Functional Economic Market Area.

Yours sincerely




Head of Planning

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to www.enfield.gov.uk/connected

Appendix 2: September 2023 Letter Regarding Reg 18 – Issues and Options Consultation



Please reply to:

Email: [REDACTED]

Phone: [REDACTED]

Date: 29th September 2023

Enfield Council's Traveller Local Plan – Issues and Options Consultation

Dear consultee,

I am writing to advise you that Enfield Council has now published a Traveller Local Plan (TLP) and supporting documentation for public consultation.

The TLP and supporting documentation is the subject of a 6-week period of formal public consultation from Friday 29th September 2023. Representations should be received no later than 5pm on Friday 10th November 2023.

Traveller Local Plan (TLP)

Enfield Council is preparing a TLP which will set out how the accommodation needs of Gypsies and Travellers within the borough, will be met. This will be subject to an ongoing programme of engagement and consultation. When it is adopted, the TLP will form part of the development plan for the area and be used in determining planning applications.

The issues and options document forms the first stage in plan-preparation. A vital part of this process is seeking the views of residents from the travelling communities, the settled population and other interested parties on the options and questions explored in the consultation document, and also on the supporting documents.

The TLP and the supporting documentation can be viewed on our website at: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

As well as the TLP, the following supporting documents can be viewed:

- Integrated Impact Assessment (July 2023)
- Updated Traveller Site Selection Methodology (September 2023)
- Gypsy and Traveller Accommodation Needs Assessment (October 2020)

[REDACTED]
Interim Executive Director of Environment and Communities
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY
www.enfield.gov.uk

If you need this document in another language or format contact the service using the details above.

- Equalities Impact Assessment (June 2020)
- Frequently Asked Questions (FAQs) (September 2023)

You can respond in several different ways:

- By downloading the response form from [here](#) , completing it and returning it by email to [REDACTED]
- By sending comments to us by email (using the above email address) or
- By sending comments to us by post to Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA - **If you are able to respond electronically, rather than by post, that would be preferred. Thank you.**

Representations cannot be made anonymously. Please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Hard copies of the Traveller Local Plan are available to view in the Civic Centre, as well as the borough's libraries. Library locations and opening hours can be found here: <https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/>

A consultation event will be held in due course. More information on this will be provided on our website in the coming days.

As part of this consultation, we are running a 'call for sites' exercise. A 'call for sites' is an opportunity for developers, landowners and other interested parties to put forward sites for development within the Borough that are considered suitable and available for development. We are seeking suggestions from landowners and other interested parties for sites to assist with the preparation of this TLP. If you would like to submit a site for consideration as part of this plan-making process, please complete our call for sites form which can be found in [here](#) ideally attaching a 1:1250 scale Ordnance Survey map which shows the precise boundaries of the site (although this could be hand drawn) and details of site ownership. The deadline for the submission of sites is **5pm on Friday 10th November 2023.**

Yours faithfully,

[REDACTED]
[REDACTED]
Plan Making Manager
Plan Making Team | Strategic Planning & Design | Planning Service

We are contacting you because you have previously indicated that you would like to receive updates on the local plan. For information on data handling please see <https://new.enfield.gov.uk/privacynotice/>

Appendix 3: October 2023 Letter Regarding DtC Meeting Unmet Need



☐ Sent via email.

☐ Please reply to: [REDACTED]

Email: travellerlocalplan@enfield.gov.uk

Phone: [REDACTED]

Textphone:

Fax:

My Ref: Duty to Cooperate – unmet needs

Your Ref:

Date: 24th October 2023

Dear Sir / Madam,

Enfield's Traveller Local Plan

As you may be aware, Enfield is in the process of preparing a new Local Plan and a separate Traveller Local Plan (TLP).

Enfield, like many other authorities, is heavily constrained which makes meeting housing needs challenging. In particular, environmental and planning constraints and lack of suitable and deliverable sites are a particular constraint on meeting the identified needs for Gypsy and Traveller pitches.

To directly address this need, as referenced above, Enfield is currently progressing work on a new Traveller Local Plan (TLP). We are currently consulting on the Issues and Options for the TLP, which you are invited to comment on. More information can be found here: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan> As part of this consultation, we are also undertaking a 'call for sites' exercise.

We have been actively engaging with all of our neighbours and stakeholders under the Duty to Cooperate for several years, and now wish to extend this process as we consider how Enfield will meet its own identified Gypsy and Traveller needs.

A Gypsy and Traveller Accommodation Needs Assessment (GTANA) was published in 2020. The assessment found that the overall need is for 23 pitches, of which 21 pitches are from households who meet the Traveller definitions set out in PPTS. The assessment did not evidence any need for additional Travelling Show person plots in the Borough. Provision of a transit site/stop over site with capacity for 6 pitches was also recommended (to accommodate up to 12 caravans at one time). The assessment stated that the Council could also consider a negotiated stopping policy to manage unauthorised encampment activity across the Borough.

In addition, the Council has prepared a draft Traveller Site Selection Methodology which we are also seeking comments on as part of the Issues and Options TLP consultation. This methodology sets out how any potential sites for Traveller development might be assessed. The suggested methodology has been adapted from the methodology used to assess housing and economic sites through the

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Housing and Employment Land Availability Assessment (HELAA) that supports the emerging Enfield Local Plan. Once the methodology has been finalised, the Council will use it to prepare a Traveller Land Availability Assessment (TLAA). The TLAA will utilise any sites submitted to the 'TLP Call for Sites' exercise, as well sites in the Housing and Economic Land Availability Assessment (HELAA), and will assess these sites against the finalised Traveller Site Selection Methodology.

As you will be aware, Enfield is a constrained borough with around 40% of its area covered by Green Belt and a further 300 hectares (5%) designated as Strategic Industrial Location (SIL). Other significant constraints such as SSSI, MOL, Registered Parks and Gardens and Ancient Woodland affect large areas of the borough.

The purpose of this letter therefore is to seek confirmation of your Council's current Local Plan position regarding meeting your identified needs for Gypsies, Travellers and Travelling Showpeople, and to formally ask if your council would be in a position to assist Enfield in meeting any of its potentially unmet Gypsy and Traveller requirements.

We are expecting to publish the next stage of the TLP in Spring 2024 and thus there is some degree of urgency for us in understanding whether or not your council would be in a position to take any of Enfield's potentially unmet Gypsy and Traveller needs. Accordingly, I would be grateful for a response to this letter by 10th November 2023.

In the meantime, if you feel you need more information, including detailed evidence or would like to discuss the matter with us before formally responding please let me know as soon as possible so that we can arrange a meeting in early November.

For your information, a similar request has also been sent to all neighbouring authorities and other authorities within our Housing Market Area.

Yours sincerely




Plan Making Manager
Plan Making Team | Strategic Planning & Design | Planning Service

IMPORTANT – Enfield residents should register for an online Enfield Connected account. Enfield Connected puts many Council services in one place, speeds up your payments and saves you time – to set up your account today go to www.enfield.gov.uk/connecte

Appendix 4: September 2024 Letter Regarding Reg 18 Draft TLP Consultation



☐ Sent via email.

☐ Please reply to: [REDACTED]

Email: travellerlocalplan@enfield.gov.uk

Phone: 020 8379 3866

Textphone:

Fax:

My Ref: Duty to Cooperate –

Your Ref:

Date: 24th September 2024

Dear Sir / Madam,

I am writing to inform you that Enfield Council has published the Draft Traveller Local Plan (TLP) and its supporting documentation for public consultation.

The public consultation period for the TLP will run for six weeks, starting on Monday, 23rd September 2024, and ending at 5pm on Monday, 4th November 2024. We invite representations from all interested parties within this timeframe.

Traveller Local Plan (TLP)

Enfield Council is preparing a TLP (Regulation 18) which will set out how the accommodation needs of Gypsies and Travellers within the borough, will be met. This will be subject to an ongoing programme of engagement and consultation. When it is adopted, the TLP will form part of the development plan for the area and be used in determining planning applications.

This Draft TLP represents the second stage of the plan preparation, following the initial 'Issues and Options' consultation in autumn 2023. We now seek feedback from all communities and stakeholders on the Draft Plan's proposed policies, site allocations, and the supporting documents.

The TLP Draft Plan and the supporting documentation can be viewed on our website at: <https://www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan>

As well as the TLP, the following supporting documents can be viewed:

- TLP Regulation 18 Consultation Statement 2024
- Updated Gypsy and Traveller Accommodation Assessment (May 2024)
- Integrated Impact Assessment (IIA) 2024
- Equality Impact Assessment (EqIA) 2024
- Site Selection Paper (2024) – Incorporating the Final Site Selection Methodology.

[REDACTED]
Interim Executive Director of Environment and Communities
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY

www.enfield.gov.uk

If you need this document in another language or format contact the service using the details above.

To streamline and improve the efficiency of public consultations, we would like to strongly encourage you to utilise our dedicated [consultation platform](#) for future submissions. Please respond by:

- Completing the [online response form](#) on our consultation portal at: [Traveller Local Plan \(Regulation 18\) part 2 | Let's Talk Enfield](#)

Alternatively, comments can be emailed to us at:

- travellerlocalplan@enfield.gov.uk

If you do not have access to the above link or email, written comments will be accepted by post at the following address:

- Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA

Representations cannot be made anonymously. Please provide your full name and contact details. Please note that representations will be made publicly available, along with your name.

Further information on how your personal data will be used is given in the privacy notice. Non personal data may be published on this website in due course. Anonymous representations will not be accepted. More information can be found here: <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan#privacy-notice-for-the-enfield-local-plan>.

Hard copies of the Traveller Local Plan are available to view in the Civic Centre, as well as the borough's **hub** libraries. Library locations and opening hours can be found here: <https://new.enfield.gov.uk/services/libraries/contact-information-and-opening-hours/>

Details of our consultation events can be found on our website.

As part of this consultation, we are running another 'call for sites' exercise. If you would like to submit a site for consideration as part of this plan-making process, please complete our [call for sites form \(PDF, 392.76 KB\)](#), ideally attaching a 1:1250 scale Ordnance Survey map which shows the precise boundaries of the site (although this could be hand drawn), and details of site ownership. This can be sent to us using the email or postal address above. The deadline for the submission of sites is 5pm on Monday 4th November 2024.

Yours faithfully,



Plan Making Manager

Plan Making Team | Strategic Planning & Design | Planning Service

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Appendix 5: February 2025 Letter Chasing Responses Regarding Unmet Need Correspondence



☐ Sent via email.

☐ Please reply to: [REDACTED]

Email: travellertocalplan@enfield.gov.uk

Phone: [REDACTED]

Textphone:

Fax:

My Ref: Duty to Cooperate –

Your Ref:

Date: 14th February 2024

Dear Sir / Madam,

As you may be aware, Enfield is in the process of preparing a separate Traveller Local Plan (TLP). This is to meet the identified need as set out within the Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2024 which can be viewed here: www.enfield.gov.uk/data/assets/pdf_file/0026/63944/Enfield-gypsy-and-traveller-and-travelling-showperson-accommodation-assessment-May-2024-Planning.pdf In short, there is a need to provide 30 permanent pitches and a transit site for at least 15 caravans up to the year 2041.

I am writing to seek confirmation of your Council's current Local Plan position regarding meeting your identified needs for Gypsies, Travellers and Travelling Showpeople, and to formally ask if your council would be in a position to assist Enfield in meeting any of its potentially unmet Gypsy and Traveller requirements.

I previously reached out to you in October 2023 and again in September 2024 to better understand what these needs were, however, to date I have not received a response. It is imperative that we actively engage with yourselves under the Duty to Co-operate (DtC) on the needs of Gypsies and Travellers as this is considered to be a strategic matter.

Enfield, like many other authorities, is heavily constrained which makes meeting housing needs challenging. In particular, environmental and planning constraints and lack of suitable and deliverable sites are a particular constraint on meeting the identified needs for Gypsy and Traveller pitches. To meet our need, we are proposing to release sites from the Green Belt (through the emerging TLP) and to ensure that this is the most sustainable option to us, it is imperative that we understand your authority's position before proceeding any further.

We hope to consult on a regulation 19 draft Traveller Local Plan (TLP) in the next few weeks in line with our current adopted Local Development Scheme (LDS) which can be viewed here: https://www.enfield.gov.uk/data/assets/pdf_file/0017/60137/Local-development-scheme-2024-Planning.pdf

More information about the TLP can be viewed on our website at: www.enfield.gov.uk/services/planning/emerging-plans#traveller-local-plan

[REDACTED]
Interim Executive Director of Environment and Communities
Enfield Council
Civic Centre, Silver Street
Enfield EN1 3XY

www.enfield.gov.uk

🔗 If you need this document in another language or format contact the service using the details above.

Please could I request that you formally respond to this letter by no later than 7th March 2025. If I do not receive a response, the issue will be escalated accordingly.

Yours faithfully,



Plan Making Manager

Plan Making Team | Strategic Planning & Design | Planning Service

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