

# Gypsy and Traveller Site Selection Methodology (SSM)

## UPDATE

### September 2023

## **Traveller Site Selection Methodology (SSM) Consultation**

This document sets out the supplementary criteria to be used at each stage of the Site Selection process for the identification of land suitable to deliver Gypsy and Traveller accommodation to meet the identified needs in Enfield.

These criteria will be used to identify potential sites for allocation in the emerging Traveller Local Plan (TLP).

A full list of the supplementary criteria to be used in assessing the suitability of sites for Gypsy and Traveller needs can be viewed at Appendix 1. The table sets out a full list of the Housing and Economic Land Availability Assessment (HELAA) information to be provided, Main Site Selection Methodology (SSM) criteria that will be used to assess sites, alongside proposed supplementary criteria to help identify sites potentially suitable to meet the needs of the Gypsy and Traveller community.

The HELAA and Main SSM criteria noted in Appendix 1 have already been consulted upon and have already been used to assess sites for inclusion in the Enfield Local Plan. It is therefore the additional supplementary criteria (to be used in assessing the suitability of sites for Gypsy and Traveller needs) that respondents to this consultation may wish to focus on.

Comments should be submitted to the Council via email to [travellerlocalplan@enfield.gov.uk](mailto:travellerlocalplan@enfield.gov.uk).

**What comments do you have on the proposed supplementary criteria to be used to assess the suitability of land for meeting Gypsy and Traveller needs at:**

- **Stage 1;**
- **Stage 2; and**
- **Stage 3.**

**Are there any 'material planning considerations' that would be relevant to the development of Gypsy and Traveller accommodation that are not captured as part of the proposed Traveller SSM.**

**Are there any proposed criteria in the Traveller SSM that are unnecessary and could jeopardise the selection of sites for the Gypsy and Traveller community verses the settled community?**

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

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# 1. Introduction

- 1.1 Enfield Council is currently preparing a new Enfield Local Plan, and separately, a new Traveller Local Plan. Once adopted the policies and proposals within these plans will guide development and help to decide on planning applications and other planning related matters during the plan period up to 2041.
- 1.2 The Plans will identify how much development the borough needs throughout the plan period and where this should be located. The Traveller Local Plan will be required to allocate sufficient land in appropriate locations to meet the identified needs of the Gypsy and Traveller community.
- 1.3 As a part of the evidence base for the Traveller Local Plan, the Council has published its Gypsy and Traveller Needs Assessment (GTANA) (2020) which sets out the quantity and type of Traveller accommodation needed within the borough in the period to 2036. The evidence will need to be updated in due course to cover the period to 2041.
- 1.4 This Gypsy and Traveller Site Selection Methodology (SSM) document (referred to as the Traveller SSM from this point onwards) sets out the proposed methodology that will be used to identify sites for their suitability to deliver Gypsy and Traveller accommodation in Enfield over the plan period. The SSM will be a supplementary assessment to the main Site Selection Methodology (February 2021)<sup>1</sup> (see Figure 01, below). It should be read alongside the Site Selection Methodology (SSM) for residential and employment uses and sets out the points at which the G&T SSM will interact with the SSM (see Figure 02, overleaf).

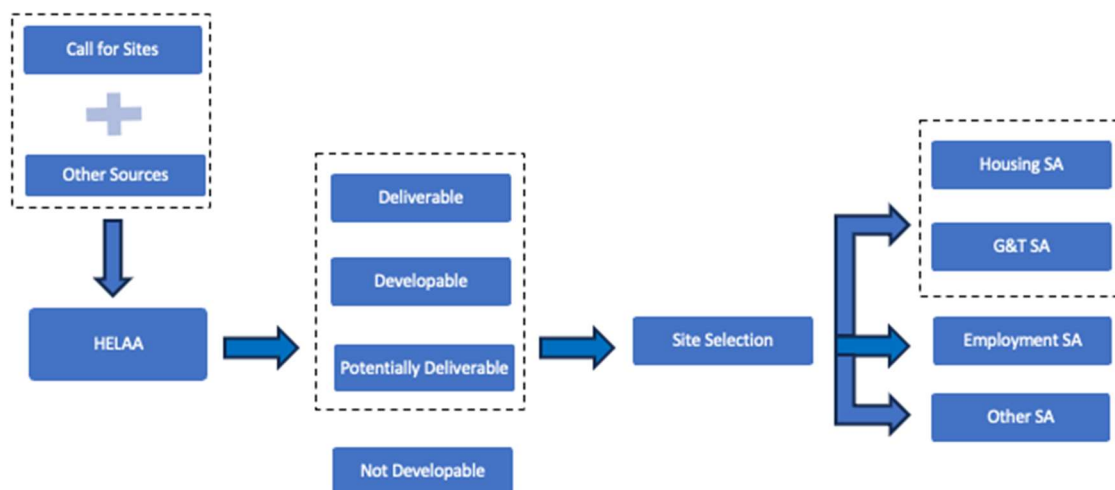
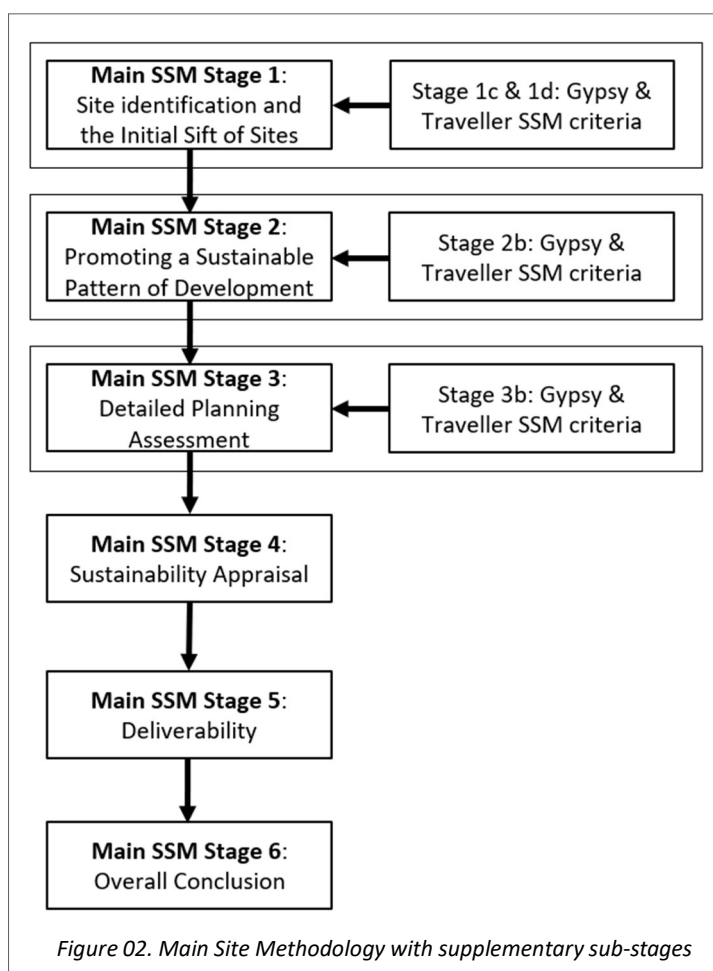


Figure 01. Site Selection Process

- 1.5 Sites will be identified using the Housing and Economic Land Availability Assessment (HELAA) as set out in paragraph 3.2 of the main Site Selection Methodology and any future Call for Sites.
- 1.6 The Council is seeking views on the proposed Traveller SSM criteria (see Appendix 1). The consultation will give stakeholders an opportunity to participate in refining the methodology before it is applied to potential sites.

<sup>1</sup> [LBE Main Site Selection Methodology \(contained in Appendix A of Housing Topic Paper\)](#)

1.7 Responses received during the previous consultation on the Traveller SSM have helped to refine the approach, and any further comments received during the consultation in September-November 2023, will assist in finalising the Traveller SSM. A summary of how consultation comments received have been considered will be published within the finalised Traveller SSM.



## Report Structure

1.8 This SSM sets out the Councils' proposed Site Selection Methodology for identifying sites to meet its identified need for Gypsies and Travellers.

- Chapter 2 sets out a summary of the Planning Policy Context
- Chapter 3 sets out an overview of the Gypsy and Traveller Site Selection Methodology
- Chapter 3 also sets out the detailed stages of the Gypsy and Traveller Site Selection Methodology:
  - Stage 1: Site identification and the Initial Sift of Sites
  - Stage 2: Promoting a Sustainable Pattern of Development
  - Stage 3: Detailed Planning Assessment
  - Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)
  - Stage 5: Deliverability
  - Stage 6: Overall Conclusion

## 2. Planning Policy Context and Evidenced Need

2.1 The Enfield Gypsy and Traveller Needs Assessment (GTANA) (2020) contains a comprehensive summary of the planning policy context relevant to Gypsy and Traveller needs and accommodation. The following paragraphs provide a high-level summary of the relevant policies and the assessment of need.

### **National Policy**

2.2 It is essential that the site selection process is undertaken having full regard to, and be consistent with, current Government policy on Traveller sites. The Government's Gypsy and Traveller Planning Policy for Traveller Sites (PPTS) sets out current government planning policy and should be read in conjunction with the NPPF. The Council's Traveller Site Selection Methodology (Traveller SSM) has been developed in response to the requirements set out in the Government's NPPF and the PPTS.

2.3 As set out in the government's Gypsy and Traveller Planning Policy for Traveller Sites (PPTS) (2015)<sup>2</sup> the overarching aim of the Government *is to ensure fair and equal treatment for Travellers, in a way that facilitates the traditional and nomadic way of life of Travellers while respecting the interests of the settled community (G&T PPG paragraph 3)*. The methodology proposed seeks to achieve these two objectives in line with the identified need set out in the Council's Gypsy and Traveller Accommodation Needs Assessment (October 2020)<sup>3</sup>.

### **London Plan Policy**

2.4 In addition to the national planning context, the London Plan sets out under *Policy H14* that boroughs should plan to meet their identified need for permanent Gypsy and Traveller pitches and must include ten-year pitch targets. Councils should undertake a needs assessment as a part of the review of Local Plans in a borough's area and plan to address issues and needs identified in the audits.

### **Enfield's Adopted Core Strategy**

2.5 The boroughs adopted Core Strategy sets out in Core Policy 6 (Meeting housing needs) that the Council will work to ensure that there is appropriate provision of specialist accommodation across all tenures), with specific reference to the criteria for assessing the locations of applications for Gypsy and Traveller sites:

- There is vehicular access from the public highway and provision for parking, turning and servicing on site to ensure road safety for occupants and visitors;
- There is no harm to visual amenity and there is adequate landscaping and planting, with appropriate trees and shrubs;
- The site has good access to shops, health care, school and other education facilities;
- The site is not in an area at high risk of flooding, including functional floodplains; and

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<sup>2</sup> [Gypsy and Traveller Planning Policy Guidance \(2015\) PPG](#)

<sup>3</sup> [Enfield Gypsy and Traveller Accommodation Needs Assessment \(2020\)](#)

- The size of the site is appropriate to its local context, and in relation to the local infrastructure and population size and density.

### **Draft Enfield Local Plan**

2.6 The Draft Local Plan Policy DM H10: Gypsy and Traveller Accommodation (published June 2021) sets out several criteria that proposals for Gypsy and Traveller pitches must address. These criteria have been considered in developing the Traveller SSM. The requirements are:

- the site is in an area suitable for residential occupation and suitably connected by sustainable modes of transport with health care, retail and school facilities with capacity;
- the impact of the development would not harm the landscape, heritage assets, biodiversity or visual character and amenity of the area, particularly the green belt;
- the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;
- the site can be safely accessed by pedestrians, vehicles and caravans;
- be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities; and
- adequate on-site utilities, including water resources and supply, waste disposal and treatment, are provided for the benefit of residents and in order to avoid adverse impacts on the natural environment.

### **Enfield's Evidence of Need**

2.7 The Council published its Gypsy and Traveller Needs Assessment (GTANA) (2020) as a part of the Enfield Local Plan evidence base, which set out the quantity and type of Traveller accommodation needed within the Borough in the period to 2036.

2.8 The Enfield GTANA identified a PPTS (Planning Policy for Traveller Sites) need for 21 permanent pitches to be delivered by 2036. The document identified a cultural need for 23 permanent pitches, with an additional 6 transit (stopover) pitches needing to be delivered by 2036. As set out in the Enfield GTANA, the cultural need accords with the overall need for the Travelling community and takes account of the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. The GTANA notes that the Council should be aware of its obligations in the referenced legislation and consider the 'cultural' need identified.

2.9 The proposed Traveller SSM will seek to identify sites to deliver the identified need of 23 pitches in the Borough, which meets the obligations of the PPTS need and will also be in accordance with the relevant legislation set out in the GTANA (2020).



### 3. Gypsy and Traveller Site Selection Methodology Overview

- 3.1 The Housing and Economic Land Availability Assessment (HELAA) provides the starting point for the assessment of land suitable for Gypsy and Traveller pitch provision (in terms of helping to identify sites potentially suitable for meeting Gypsy and Traveller accommodation needs).
- 3.2 The criteria proposed to be used for the Traveller SSM address the matters set out in paragraph 4.14.1 of the London Plan, namely that sites are “*well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood*”.
- 3.3 The full list of site assessment criteria are set out at Appendix 1 – with these being a combination of criteria from the main SSM (February 2021) and the specific criteria proposed in this Traveller SSM. Table 01 (below) provides an overview of the proposed site selection process for Gypsy and Traveller sites.

| <b>Table 01: Combined Site Selection Methodology and Traveller Site Selection Overview</b> |  |   |
|--|--|---|
| <b>Stage</b>   | <b>Stage overview</b>  | <b>Criteria source</b>  |
| <b>Stage 1:<br/>Identification and initial sift of sites</b>                               | Stage 1a: Identification of sites  | Main SSM criteria   |
|  | Stage 1b: Assessment of absolute constraints   | Main SSM criteria   |
|  | Stage 1c: Size threshold to meet minimum number of pitches (Gypsy & Traveller constraint criteria): <ul style="list-style-type: none"> <li>Minimum size of 4 pitches (minimum of 0.2ha) &amp; associated facilities</li> </ul>   | Traveller SSM criteria  |
|  | Stage 1d: Planning status <ul style="list-style-type: none"> <li>All sites with planning permission for housing will be sifted out at this stage</li> </ul>  | Traveller SSM criteria  |
| <b>Stage 2:<br/>Promoting a sustainable pattern of development</b>                         | Stage 2a: Sites considered on a sequential approach directing growth to specific locations, based on the overall hierarchy which: <ul style="list-style-type: none"> <li>Prioritises land in the urban area, then</li> <li>Prioritises brownfield land in the Green Belt, then</li> <li>Prioritises lower performing land in the Green Belt</li> </ul> | Main SSM criteria   |
| <b>Stage 3:<br/>Detailed planning assessment</b>   | Stage 3a: Consideration of technical constraints (e.g., highways)  | Main SSM criteria   |
|  | Stage 3b: Consideration of other non-absolute constraints (e.g., heritage /ecological etc.) using; <ul style="list-style-type: none"> <li>Existing Site Selection Methodology; and</li> <li>Proposed Gypsy and Traveller site selection methodology</li> </ul>   | Main SSM criteria; and<br><br>Traveller SSM criteria (see Table 04 below) |

|  |  |  |
|--|--|--|
| <b>Stage 4:<br/>Sustainability<br/>Appraisal (as<br/>part of the<br/>Integrated<br/>Impact<br/>Assessment)</b> | Stage 4: Identify any significant negative effects that may require mitigation if site is put forward for allocation | Main SSM criteria;<br>and<br>Traveller SSM<br>criteria |
| <b>Stage 5:<br/>Deliverability</b>   | Stage 5: Does the evidence indicate that the site could be delivered within the plan period?                         | Main SSM criteria;<br>and<br>Traveller<br>SSM criteria |
| <b>Stage 6:<br/>Overall<br/>Conclusion</b>   | Stage 6: Indication of preferred site allocations  | Main SSM criteria;<br>and<br>Traveller<br>SSM criteria |

## **Stage 1: Site Identification and Initial sift of sites**

### **Stage 1a - Identification of Sites**

3.4 The Traveller SSM will utilise the HELAA and any future Call for Sites to identify land for the future supply of Gypsy and Traveller sites in the Borough. The main SSM lists the sources used to compile the long list of potential sites included in the HELAA (see paragraph 3.2 of the main SSM).

### **Stage 1b – Assessment of Absolute constraints**

3.5 This stage forms part of the HELAA, assessing sites against absolute constraints as set out in the main SSM. These constraints will help identify if the land is suitable for delivering housing, which includes the suitability for Gypsy and Traveller use. Sites wholly covered by absolute constraints will be discounted from further stages of assessment.

### **Stage 1c – Size Threshold and Planning History**

3.6 A significant number of developable and potentially developable sites have been identified within the HELAA. The Traveller SSM proposes a threshold for the initial sifting of all developable and potentially developable sites specifically for Gypsy and Traveller use.

3.7 The PPTS does not provide any guidance on the appropriate minimum size for a Traveller site. The DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)<sup>4</sup>, which has been withdrawn, also does not provide specific guidance on minimum site size thresholds. The guidance does contain information relating to site design requirements and indicates that 0.2 hectares can be used as a minimum size threshold which would accommodate approximately 4 pitches. These thresholds include capacity for the delivery of private pitches and the associated shared facilities.

<sup>4</sup> [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

3.8 The Traveller SSM proposes to use 0.2 hectares as the minimum site size threshold, with sites smaller than this discounted from further consideration for gypsy and traveller use. It should be noted that whilst those sites at or just above the site size threshold will pass through to the next stages of assessment, depending upon their shape, site constraints etc., it may be that they are too small to accommodate a minimum of 4 pitches with the required supporting facilities.

3.9 For transit pitches, each individual pitch needs to contain the following:

- Space for two touring caravans
- Two parking spaces
- Water and electricity connections; and
- A three-metre buffer around the boundary.

3.10 For permanent pitches, each pitch would generally need to contain the following:

- Space for a mobile home
- Space for a touring caravan
- An amenity block (containing WC with sink, bath/shower, storeroom, kitchen/food preparation area, small dining area)
- Two parking spaces
- At least six metres between mobile homes; and
- A three-metre buffer around the boundary.

3.11 The Enfield GTANA notes that it is generally accepted amongst the travelling community that sites of 6 to 10 pitches are appropriate. It caveats this with local circumstances such as families wanting to have sites for their own use should be considered when planning new provision. Some respondents to the household survey specifically requested sites for specific family groups within the 6–10 pitch range.

3.12 As noted in paragraph 3.10 of the Enfield GTANA, sites of 6 to 10 pitches are generally accepted as appropriate within the Gypsy and Traveller community with the DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008) setting out 0.2 hectares can provide approximately 4 pitches (with capacity for 8 caravans and associated facilities). In advance of knowing how many sites might potentially be available and suitable for meeting Gypsy and Traveller needs, the Traveller SSM has set the low site size threshold of 0.2 hectares, to ensure potentially suitable sites are not overlooked, and to hopefully ensure a reasonably sized pool of sites from which to select sites for allocation.

3.13 At this stage the G&T SSM proposes to include the planning status of land in order to carry out the first sift sites. The proposed criteria will exclude sites that have extant planning permissions for housing, except in instances where the permission is for Gypsy & Traveller accommodation (as such permissions could help meet the identified need for Gypsies and Traveller accommodation in the Borough).

|   |   |                             |                        |
|---|---|-----------------------------|------------------------|
|   |   |                             |                        |
| <b>Planning status</b>                                  | All sites with planning permissions for housing will be excluded at this stage (except sites that include provision of G&T accommodation) |                             | Proposed Traveller SSM |
| <b>Minimum site threshold (approximately 4 pitches)</b> | 0.2 ha or greater (included)  | Less than 0.2 ha (excluded) | Proposed Traveller SSM |

## **Stage 2: Promoting Sustainable Pattern of Development**

- 3.14 At Stage 2 sites will be sifted using the main SSM criteria (see Appendix 1) and the supplementary proposed Traveller SSM criteria (see Table 03 below).

### **Stage 2a: Sites considered on a sequential approach directing growth to specific locations**

- 3.15 The main SSM document sets out how remaining site options will be assessed and prioritised at Stage 2 (see Table 03) where the allocation of land will be prioritised in the urban area, with an emphasis on brownfield sites, in addition to ensuring sites conform with the emerging spatial strategy for the pattern and scale of development in the Borough.
- 3.16 As referenced in the main SSM the NPPF aims to promote patterns of development which make the fullest possible use of public transport, walking and cycling and which can minimise the need to travel.

| <b>Priority</b> | <b>Broad Site location</b>  | <b>Site typology</b>   | <b>Approach to Allocation</b>   |
|-----------------|-----------------------------|--|---|
| 1               | Sites within the urban area | Brownfield sites in urban areas                                      | Allocation, subject to other stages   |
| 2               |                             | Greenfield sites in urban areas                                      | Allocation, subject to other stages   |
| 3               | Accessible Green Belt sites | Brownfield sites in accessible <sup>6</sup> Green Belt locations     | Potential allocation possible subject to alignment with emerging spatial strategy and the demonstration of exceptional circumstances.                   |
| 4               |                             | Greenfield sites in accessible, lower performing Green Belt location | Potential allocation possible subject to alignment with emerging spatial strategy and demonstration of exceptional circumstances.                       |
| 5               |                             | Greenfield in accessible, moderately performing Green Belt location  | Potential allocation less likely, unless exceptional circumstances demonstrated, and site forms an important and integral part of the spatial strategy. |

<sup>5</sup> Site Selection Methodology: Table 2: Prioritisation of sites by category

<sup>6</sup> Accessibility will be determined by the Public Transport Accessibility Level (PTAL) of sites.

|   |                           |   |   |
|---|---------------------------|---|---|
| 6 |                           | Greenfield in accessible, high performing Green Belt location           | Potential allocation less likely, unless exceptional circumstances demonstrated, and site forms an important and integral part of the spatial strategy. |
| 7 | Isolated Green Belt Sites | Brownfield in isolated Green Belt location                              | No allocation unless exceptional circumstances demonstrated, and site forms an important and integral part of the spatial strategy.                     |
| 8 |                           | Greenfield in isolated low or moderately performing Green Belt location | No allocation unless exceptional circumstances demonstrated, and site forms an important and integral part of the spatial strategy.                     |

### **Stage 3: Detailed Planning Assessment**

3.17 The main SSM criteria will be applied to all sites included at Stage 3 (see Appendix 2) with the proposed supplementary criteria of the Traveller SSM, which will specifically assess land for its potential suitability as a Gypsy and Traveller site.

#### **Stage 3a – Consideration of Technical Constraints**

3.18 As set out in the main SSM this stage involves the consideration/assessment of physical and environmental constraints in accordance with Planning Practice Guidance on Land Availability Assessments. Sites will be assessed using the main SSM.

3.19 Each site will therefore be subject to advice from relevant specialist officers, as well as those at the GLA and from statutory infrastructure providers where necessary, relating to matters such as highways, environmental health and the environment. This will include a strategic assessment of whether any constraints identified could be mitigated.

3.20 At this stage where significant environmental and/or physical constraints are identified (and cannot be mitigated), sites will not be taken forward for further consideration.

#### **Stage 3b – Consideration of other non-absolute constraints**

3.21 The main SSM sets out that the assessment of sites comprises the consideration of several key criteria including Green Belt (as part of Stage 2) flood risk, and highways. In addition, the potential impact on landscape, historic assets, ecological designations, utilities, education, health facilities also need to be considered.

3.22 The proposed Traveller SSM assessment criteria include supplementary non-absolute constraints for consideration at Stage 3b (see Table 04 below). Sites will be assessed against each of the criteria, with consideration given to whether the constraints identified can be overcome on a site by site basis. Using the main SSM and the proposed supplementary Traveller SSM criteria, a qualitative approach will be taken to analysing sites. All sites not excluded will automatically be taken forward to the next stage of the site selection process.

3.23 This approach ensures the site assessment follows a consistent approach with the main site selection methodology, while further sifting sites that could meet the specific

needs of the Gypsy and Traveller community. Proposed criteria will include assessing Gypsy and Traveller sites for:

- The environment for occupiers, including but not exclusive of, noise, odour, adjacent uses to the site i.e., industrial uses.
- Site access for vehicles (including caravans and emergency vehicles).
- Site access for pedestrians to the highway.
- The existing users near the sites and to avoid unacceptable impact to the surrounding community, both residential and business users.
- Access to local facilities and services, including health, education and shopping facilities.

3.24 The proposed Traveller SSM criteria (Table 04) recognise the benefits of a cleared site and the issues of conversion or demolition of buildings on site, which may impact on the viability and deliverability of Gypsy and Traveller sites.

3.25 At this Stage, sites that require the demolition of a building to clear the site will be excluded and not taken forward to Stage 4.

| <b>Table 04: Stage 3b Traveller SSM: Detailed Site Assessment</b>  |  |   |
|--|--|---|
| <b>Assessment criteria</b>   | <b>Assessment criteria grading</b>   |   |
| <b>Does the site contain existing development?</b>   | Building on site that need to be demolished  |   |
|  | Building on site that can possibly be converted for Gypsy and Traveller use        |   |
|  | None on site   |   |
| <b>Access to road network (good vehicle /pedestrian access from highway)</b>                               | Y<br>(included)  | N<br>(are mitigation measures possible) |
| <b>Site access (see DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)<sup>7</sup>)</b> | Y<br>(included)  | N<br>(are mitigation measures possible) |
| <b>Access to services- including health, schools, shops and public transport</b>                           | Y<br>(included)  | N<br>(are mitigation measures possible) |
| <b>Access to Utilities (e.g mains water, electricity, sanitation on site or able to be provided)</b>       | All available  |   |
|  | Some available   |   |
|  | None   |   |
| <b>Acoustic Privacy</b>  | No noise issue or existing acoustic barriers                                       |   |
|  | Noise issue near site which may require mitigation                                 |   |
|  | Major noise issue on or close to site requiring mitigation before site can be used |   |

<sup>7</sup> [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

## **Stage 4: Sustainability Appraisal (as part of the Integrated Impact Assessment)**

- 3.26 As set out in Stage 4 of the main SSM, Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan and is a key part of the evidence base of the Local Plan. The SA is integrated in the Integrated Impact Assessment (IIA), which will also include the following assessments:
- Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)
  - Habitat Regulations Assessment (HRA)
  - Equalities Impact Assessment (EqIA)
  - Health Impact Assessment (HIA)
  - Community Safety Impact Assessment (CSIA)
- 3.27 The role of the IIA is to promote sustainable development through better integration of sustainability considerations in the plan-making process. It is an iterative process that identifies and reports on the likely significant effects of a plan or strategy, and the extent to which implementation of the plan or strategy will contribute toward sustainable development.
- 3.28 As set out in the main SSM, the IIA informs decision-makers about the environmental and sustainability consequences of the proposed Local Plan policies which can then be considered alongside financial, technical, political and other concerns.
- 3.29 In line with the stages of the main SSM, sites that are carried forward from the initial sift of sites will be subject to an Integrated Impact Assessment (IIA). This is to ensure that sites which are deemed 'reasonable alternatives' are considered against the IIA objectives to determine their sustainability.
- 3.30 Sites will be considered against the objectives set out at Appendix 3.
- 3.31 The IIA work will identify the likely significant effect of development at each site. In addition, and where possible, it will also seek to identify ways in which the harmful effects of development may potentially be avoided or mitigated.
- 3.32 As set out in the main SSM, sites that are taken forward for potential allocation will be fully informed by the overall outcomes of the IIA testing as a qualitative assessment, in addition to other evidence that emerges through or outside of the site assessment process. As with the approach taken in the main SSM, a summary of the IIA Appraisal for each site will be included in the site assessment sheet to help ensure the selection of the most appropriate sites for inclusion in the emerging Traveller Local Plan.

### **Habitats Regulations Assessment (HRA)**

- 3.33 The main SSM sets out the need for HRA, which is set out within Article 6 of the EC Habitats Directive 1992 and interpreted into British law by the Conservation of Habitats & Species Regulations 2017.
- 3.34 The HRA is a separate process focused on avoiding impacts to internationally designated biodiversity sites. In short, the discussion within the [HRA of the Reg-18 Local Plan](#) considers the potential adverse effects of growth on the integrity of the Epping Forest Special Area of Conservation (SAC), the impacts on Lee Valley SPA/Ramsar site and Wormley Hoddesdon Park Woods SAC. HRA is an iterative

process and is expected to be updated in light of newly available evidence and comments from key consultees.

### **Stage 5: Deliverability**

3.35 This stage considers whether sites are or are not deliverable, and the timescales and phasing of delivery. The starting point will be the assessment of achievability contained within the HELAA, with supplementary criteria specifically applied to assess the suitability of sites for allocation for Gypsy and Traveller use. Considerations will include:

- Land ownership (e.g., private site put forward for Gypsy and Traveller use)
- Site infrastructure and delivery issues (e.g., mitigation measures required to meet specific site requirements such as utilities)
- Barriers to delivery (e.g., the site has been identified as a suitable site allocation for housing, employment, retail, infrastructure and other mixed uses)
- Delivery approaches
- Site capacity taking into account constraints and other relevant factors (e.g., that sites are likely to be delivered within the timeframes of the GTANA 2020 or within the Plan Period)

3.36 At this stage consideration will be given to the deliverability of the site with a high-level assessment of whether development is viable

### **Stage 6: Overall Conclusion**

3.37 The final stage of the process is to draw conclusions and to make recommendations about the suitability of each site for inclusion as a proposed allocation in the Traveller Local Plan. This final stage necessitates an element of professional judgement, taking into account:

- Suitability
- Whether the land is previously developed land, and/or in the urban area
- Accordance with the emerging spatial strategy
- The findings of the Sustainability Appraisal/ IIA work
- Emerging Draft Local Plan Policy requirements
- Deliverability of sites; and
- Any other relevant factors.

3.38 A site selection summary table will be prepared. The conclusions will set out whether a site is recommended for inclusion as a site allocation in the Traveller Local Plan. The summary table will also outline the reasoning for recommending that a site is included or not included as a site allocation.



## 4. Appendices

### Appendix 1: Full list of Site Assessment Criteria

- A.1 Set out in Table 06 below are the proposed criteria to identify sites specifically for Gypsy and Traveller accommodation. The table below includes the main SSM that will be applied at each stage of the site selection process, supplemented by the proposed Traveller SSM criteria. The main SSM identifies land suitable for all housing and the proposed Traveller SSM sets out additional criteria to assess whether sites are suitable for meeting the specific needs of the Gypsy and Traveller community.
- A.2 Some assessment criteria will be assessed using a RAG (Reg/Amber/Green) approach (Table 05 below). This will identify sites that have no known constraints, those with identified constraints that can potentially be mitigated, and those with significant constraints that are likely to rule a site out from further consideration. This approach should facilitate bringing forward the most appropriate sites to meet the needs of the Gypsy and Traveller community.

| Table 05: Proposed appraisal criteria |  |
|---------------------------------------|--|
| Assessment                            | Definition   |
|                                       | No constraints identified. Development acceptable in principle.  |
|                                       | Constraints identified. Mitigation should be possible within the plan period.  |
|                                       | Significant constraints identified. Mitigation unlikely and it is probable development is unacceptable within the plan period. |

| Table 06: Criteria by stage for Gypsy and Traveller site allocation assessment  |                              |                             |                        |
|---|------------------------------|-----------------------------|------------------------|
| Assessment criteria   | Assessment criteria grading  |                             | Assessment Criteria    |
| <b>Stage 1a: Identification of sites</b>  |                              |                             |                        |
| Identification of sites (e.g. Site address, Site area (ha), Current land use)   | N/A for consultation         |                             | SSM criteria           |
| <b>Stage 1b: Assessment of absolute constraints</b>   |                              |                             |                        |
| Assessment of absolute constraints (e.g. Potential physical constraints, environmental constraints, access/highways, Access to local services, Overall availability conclusion) | N/A for consultation         |                             | SSM criteria           |
| <b>Stage 1c: Size threshold to meet minimum number of pitches</b>   |                              |                             |                        |
| Minimum site threshold (approximately 6 pitches)  | 0.2 ha or greater (included) | Less than 0.2 ha (excluded) | Proposed Traveller SSM |

| <b>Stage 1d: Planning status</b>   |   |                                       |                               |
|--|---|---------------------------------------|-------------------------------|
| <b>Planning history</b>  | Planning application currently associated with site                             |                                       | Proposed Traveller SSM        |
|  | For a different use in last 5 years that  |                                       |                               |
|  | deliverability  |                                       |                               |
|  |   | None                                  |                               |
| <b>Stage 2a: Site assessment: Suitability assessment</b>   |   |                                       |                               |
| <b>Sites within the urban area</b>   | N/A for consultation  |                                       | SSM criteria (see Table 03)   |
| <b>Accessible Green Belt sites</b>   |   |                                       |                               |
| <b>Isolated Green Belt Sites</b>   |   |                                       |                               |
| <b>Stage 2b site assessment: Suitability assessment</b>  |   |                                       |                               |
| <b>Does the site contain existing development?</b>   | Building on site that need to be  |                                       | Proposed Traveller SSM        |
|  | Building on site that can possibly be converted for the Gypsy and Traveller use |                                       |                               |
|  | None on site  |                                       |                               |
| <b>Stage 3a: Detailed site assessment - Consideration of Technical Constraints</b>                         |   |                                       |                               |
| <b>Consideration of Technical Constraints</b>  | N/A for consultation  |                                       | SSM criteria (see Appendix 2) |
| <b>Stage 3b: Detailed site assessment - Consideration of other non-absolute constraints</b>                |   |                                       |                               |
| <b>Consideration of other non-absolute constraints</b>   | N/A for consultation  |                                       | SSM criteria (see Appendix 2) |
| <b>Access to road network (good vehicle /pedestrian access from highway)</b>                               | Y (included)  | N (are mitigation measures possible?) | Proposed Traveller SSM        |
| <b>Site access (see DCLG Designing Gypsy and Traveller Sites: Good Practice Guides (2008)<sup>8</sup>)</b> | Y (included)  | N (are mitigation measures possible?) | Proposed Traveller SSM        |
| <b>Access to services- including health, schools, shops and public transport</b>                           | Y (included)  | N (are mitigation measures possible?) | Proposed Traveller SSM        |
| <b>Access to Utilities (e.g mains water, electricity, sanitation on site or able to be provided)</b>       | All available   |                                       | Proposed Traveller SSM        |
|  | Some available  |                                       |                               |
|  | None  |                                       |                               |

|                         |  |                        |
|-------------------------|--|------------------------|
| <b>Acoustic Privacy</b> | Major noise issue on or close to site requiring mitigation before site can be used | Proposed Traveller SSM |
|                         | Noise issue near site which may require mitigation                                 |                        |
|                         | No noise issue or existing acoustic barriers                                       |                        |

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<sup>8</sup> [DCLG Designing Gypsy and Traveller Sites: Good Practice Guides \(2008\)](#)

## Appendix 2: Main Site Selection Methodology Detailed Assessment considerations

| <b>Table 07: Main Site Selection Methodology Detailed Assessment considerations</b>  |  |   |  |
|--|--|---|--|
| <b>Question</b>  | <b>Assessment outcome</b>  |   |  |
| Is the site within a landscape character area?   | Y<br>could have significant impacts on landscape quality   | Y<br>but not considered to be harmful   | N  |
| Is the site within a valuable townscape character area?  | Y<br>the site could have significant impacts on townscape and cannot be mitigated to an acceptable level   | Y<br>the site would impact the townscape but could be mitigated to an acceptable level  | N<br>The site has limited townscape character. |
| Does the site have open space / recreation value, or is it located within an area of deficiency?                                     | Y<br>the site is of important recreational value / would result in the total loss of an area of open space with no replacement in an area of deficiency                      | Y<br>The site is of moderate recreational value / would result in the loss of open space, but some space could be retained or re-provided / would not lead to loss of open space, but no potential to provide additional space in an area of deficiency | N  |
| Are there Tree Preservation orders / veteran trees / protected vegetation on site (e.g., hedgerows / areas of woodland on the site)? | Y<br>would require significant loss or harm  | Y<br>but can be developed without significant loss or harm  | N  |
| Are there designated heritage assets on site?  | Y<br>would result in significant harm that cannot be mitigated   | Y<br>adjacent to site and would result in less than substantial harm that could be mitigated  | N  |
| Are there undesignated heritage assets on site?  | Y<br>would result in significant harm that cannot be mitigated   | Y<br>adjacent to site and would result in less than substantial harm that could be mitigated  | N  |
| Agricultural land classification   | Grade 1 or 2   | Grade 3a  | Grade 3b                                       |
| Would proposed use compromise the integrity or effectiveness of Strategic Industrial Land?   | Y<br>Would compromise the integrity or effectiveness of the site (or adjacent SIL) in accommodating industrial-type activities and its ability to operate on a 24-hour basis | -   | N  |
| Does the site lie in an area (hot spot) of poor air quality?   | Y<br>the site lies in an area of poor air quality where development would be unacceptable  | Y<br>the site lies in an area of poor air quality, but mitigation could make it acceptable for development  | N  |

## Appendix 3: Integrated Impact Assessment Objectives

| <b>Table 08: Integrated Impact Assessment objectives</b> |   |
|--|---|
| <b>Topic</b>   | <b>TLP Integrated Impact Assessment Objective(s)<sup>1</sup></b>  |
| <b>Air quality</b>                                       | Minimise air pollution. (LBE IIA: Objective 11)   |
| <b>Biodiversity</b>                                      | Deliver biodiversity net gain at an ambitious scale and avoid/mitigate impacts to valued habitats and ecological networks. (LBE IIA: Objective 13)  |
| <b>Brownfield first</b>                                  | To achieve efficient use of land and materials. (LBE IIA: Objective 16)   |
| <b>Climate change adaptation</b>                         | Ensure resilience to climate change particularly mindful of the likelihood of climate change leading to problematic high temperatures, worsened flood risk and increased risk of drought. (LBE IIA: Objective 2)  |
| <b>Climate change mitigation</b>                         | Ensure the Local Plan serves to minimise LBE's per capita CO2 emissions such that the council will become a carbon neutral organisation by 2030 and a carbon neutral borough by 2040. (Enfield Local Plan: IIA Objective 1)   |
| <b>Communities</b>                                       | Support good access to services, facilities and wider community infrastructure, for new and existing residents, mindful of the potential for community needs to change over time. (LBE IIA: Objective 5)<br><br>Encourage social inclusion, promotion of equality and a respect through diversity. (LBE IIA: Objective 6) |
| <b>Crime and community safety</b>                        | Reduce crime and increase community safety. (LBE IIA: Objective 7)<br><br>Focus on delivering the 'Vision Zero' target for road safety. (LBE IIA: Objective 8)  |
| <b>Economy and employment</b>                            | Support a strong, diverse and resilient economy that provides opportunities for all. (LBE IIA: Objective 9)   |
| <b>Flood risk</b>  | Manage and reduce the risk of flooding. (LBE IIA: Objective 17)   |
| <b>Health</b>  | Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities within the borough. (LBE IIA: Objective 4)   |
| <b>Heritage</b>  | Sustain and enhance the significance of heritage assets. (LBE IIA: Objective 14)  |
| <b>Housing</b>   | Deliver housing to meet agreed targets and support an appropriate mix of housing types and tenures, including affordable and specialist housing, including housing for the elderly and disabled people. (LBE IIA: Objective 3)  |
| <b>Landscape and townscape</b>                           | Protect and enhance the character, quality and diversity of the Borough's landscape and townscapes. (LBE IIA: Objective 15)   |
| <b>Mental health and wellbeing</b>                       | Improve the physical and mental health and wellbeing of Enfield residents and reduce health inequalities between local communities in the borough. (LBE IIA: Objective 4)   |

<sup>1</sup> See 2023 Integrated Impact Assessment.

|                     |  |
|---------------------|--|
| <b>Town centres</b> | Support the vitality of the borough's town and local centres. (LBE IIA: Objective 10)                  |
| <b>Transport</b>    | Minimise the need to travel and support modal shift away from the private car. (LBE IIA: Objective 12) |
| <b>Water</b>        | Minimise water use and protect water quality. (LBE IIA: Objective 18)                                  |

## Appendix 4: Glossary

| Glossary   |   |
|--|---|
| <b>Achievability</b>                             | A site which is regarded achievable for development where there is a practical view that housing (in the case of the Traveller SSM, Gypsy and Traveller accommodation) can be developed at a certain point in time. This is fundamentally a judgement about the economic viability of the site, and the capacity of the site promoter to deliver the proposed use.  |
| <b>Allocation</b>                                | The Council's Local Plan identifies areas of land for development. The allocation will also indicate the Council's preferred use for the land.  |
| <b>Availability</b>                              | A site which is seen as available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This means that it is controlled by a developer or promoter who has expressed an intention to develop, or the landowner has expressed an intention to sell. |
| <b>Call for Sites</b>                            | Exercise undertaken by the Council inviting interested parties to submit sites for consideration in the Housing and Economic Land Availability Assessment/ Local Plan/ Traveller Local Plan.  |
| <b>Caravans</b>                                  | Mobile living vehicles used by Gypsies and Travellers; also referred to as trailers.  |
| <b>Community Safety Impact Assessment (CSIA)</b> | Assessment to ensure that the Local Plan vision, objectives, policies and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.   |
| <b>DCLG (DLUHC)</b>                              | Department for Communities and Local Government; created in May 2006. Now the Department for Levelling Up, Housing and Communities (DLUHC). Responsible for the remit on Gypsies and Travellers, which was previously held by the Office of the Deputy Prime Minister (ODPM).   |
| <b>Deliverability</b>                            | Whether a site is deliverable within the timeframes of the Local Plan, taking into account matters including viability.   |
| <b>Developable</b>                               | A site should be in a suitable location for the proposed development, and there should be a reasonable prospect that it will be available for and could be viably developed at a specific point in time.  |

|  |  |
|--|--|
| <b>Equalities Impact Assessment (EqIA)</b>                       | Equalities Impact Assessment is a systematic and evidence-based tool, which enables consideration of the likely impacts of proposals on different groups of people. Equality impact assessments ensure that policies, services and legislation do not discriminate against anyone and that, where possible, we promote equality of opportunity.  |
| <b>GLA</b>   | Greater London Authority.  |
| <b>Gypsies and Travellers</b>                                    | Defined by DCLG Planning Policy for Traveller Sites (August 2015) as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”. The planning policy goes on to state that, “In determining whether persons are “Gypsies and Travellers” for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters: a) whether they previously led a nomadic habit of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances”. |
| <b>Gypsy and Traveller Needs Assessment (GTANA) (2020)</b>       | An independent assessment that establishes the evidence of need for permanent residential pitches and transit provision in an area. It should provide a clear, robust and credible evidence base to inform the development of policies relating to Gypsy and Travellers and Travelling Showpeople. The Council is required to provide a five-year land supply for Gypsy and Traveller sites within its Local Plan in the same way as for other types of housing.   |
| <b>Habitat Regulations Assessment (HRA)</b>                      | A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.   |
| <b>Health Impact Assessment (HIA)</b>                            | An Impact Assessment to ensure that there is a focus on achieving better health and wellbeing of communities, as an outcome of their policy initiatives and plans.   |
| <b>Housing and Economic Land Availability Assessment (HELAA)</b> | An appraisal of the amount of land available for housing and economic use and is required in order to assess the capacity of suitable land.  |
| <b>Integrated Impact Assessment (IIA)</b>                        | An assessment that incorporates the statutory responsibilities to undertake for Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA). It also includes a Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA).   |



|  |  |
|--|--|
| <b>Local Plan</b>  | The Local Plan sets out how the borough will change and develop in the future and how its places and environs will be protected and enhanced. The Local Plan is drawn up by the Local Planning Authority (Enfield Borough Council).  |
| <b>London Plan</b>   | The London Plan is the name given to the mayor's spatial development strategy for the capital. It is prepared and published by the Greater London Authority.   |
| <b>National Planning Policy Framework (NPPF)</b>                               | This sets out the Governments requirements on planning policy for England and how it expects them to be applied.   |
| <b>Non-absolute constraints</b>  | Non-absolute constraints are those that can usually be addressed through careful siting and design. Non-absolute constraints are given less weight in national policy.   |
| <b>Permanent sites</b>   | Pitches providing residents with a permanent home.   |
| <b>Pitch</b>   | Area of land on a Gypsy/Traveller site occupied by one resident family and their caravans (static and travelling) and parking spaces together with enough room for the turning of vehicles. Sometimes referred to as a plot, especially when referring to Travelling Showpeople. DCLG Planning policy for Traveller sites (August 2015) states that "For the purposes of this planning policy, "pitch" means a pitch on a "Gypsy and Traveller" site and "plot" means a pitch on a "travelling showpeople" site (often called a "yard"). This terminology differentiates between residential pitches for "Gypsies and Travellers" and mixed-use plots for "travelling showpeople", which may / will need to incorporate space or to be split to allow for the storage of equipment". |
| <b>PPTS</b>  | Planning Policy for Traveller Sites (DCLG, 2012 and 2015 editions).  |
| <b>Site</b>  | An area of land being proposed for Gypsy/Traveller accommodation in the context of this document (Traveller Site Selection Methodology).   |
| <b>Site Selection Methodology (February 2021)</b>                              | The Site Selection Methodology (SSM) is intended to objectively screen and then assess sites, taking into account a wide range of factors to guide choices over site allocations in the Local Plan and Traveller Local Plan (in the case of the latter, supplemented by the Traveller SSM).  |
| <b>Suitability</b>   | A site is considered suitable for housing development (including Gypsy and Traveller accommodation) if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. For sites not allocated for housing in development plans or having the benefit of planning permission for housing, policy restrictions, physical problems or limitations, potential impacts and environmental conditions should be considered.  |
| <b>Sustainability Appraisal</b>  | An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.  |
| <b>Sustainability Assessment (SA)/Strategic Environmental Assessment (SEA)</b> | A structured approach to determine the environmental and socio-economic effects development could have.  |

|   |   |
|---|---|
| <b>Technical Constraints</b>                | Physical and environmental constraints.   |
| <b>Traveller Site Selection Methodology</b> | The Traveller Site Selection Methodology (SSM) is intended to objectively screen and then assess sites taking into account a wide range of factors to guide choices over site allocations in the Traveller Local Plan specifically to meet the identified need for Gypsies and Travellers in an area.   |
| <b>Transit sites</b>                        | A site that is authorised for short-term stays by Gypsies and Travellers. The site is usually permanent but are used short term and have basic amenities and services. There is a limit on the length of time residents can stay. They are only meant to be for short-term stop-overs.  |
| <b>Unauthorised encampment</b>              | Land that is owned by Gypsies and Travellers but does not have planning permission for use as a residential or transit site. If an unauthorised encampment is on Council land, the Council has a power, not a duty, to move them on and they may only evict them subject to complying with Human Rights legislation and other procedures. Failure to comply would render the Council and Police officers liable to a challenge in the courts, proving potentially costly and quite probably resulting in lengthy stays for the Travellers. The Council cannot remove Gypsies and Travellers immediately from land on which they are illegally encamped. This Council has taken legal action to remove Gypsies and Travellers from such sites. |
| <b>Utilities</b>                            | Includes water, electricity, sewerage, drainage and refuse disposal.  |