

# Traveller Local Plan (TLP)

Meeting the needs of Gypsies, Travellers and Travelling Showpeople

Issues and Options (Regulation 18) Consultation

October 2023

Version for Cabinet 11.07.23

[www.enfield.gov.uk](http://www.enfield.gov.uk)



## Consultation Details

This document explores the Issues and Options relating to the provision of sites to meet the needs of the Traveller communities in the Borough. The Traveller communities, the wider public and other stakeholders are now invited to submit comments on the content of this Issues and Options document and the accompanying Gypsy and Traveller Accommodation Needs Assessment (GTANA), Integrated Impact Assessment, Habitat Regulations Assessment and the updated Traveller Site Selection Methodology.

### *How can I respond to this consultation?*

You can respond in several different ways:

- By completing the on-line response form on our consultation portal at <http://consult.xx>
- By downloading the response form from our consultation portal at <http://consult.xx>, completing it and returning it by email to [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) (referring to TLP Reg-18' within the email subject heading)
- By sending comments to us by email (using the above address) or
- By sending comments to us by post to Plan Making Team, Enfield Council, Civic Centre, Silver Street, Enfield, EN1 3XA

More information can be found on the Council's website at:

<https://www.enfield.gov.uk/services/planning>

There is now a **6 week** consultation running from **Monday 2<sup>nd</sup> October 2023** until **Monday 13<sup>th</sup> November 2023**. All comments must be received by **5pm on Monday 13<sup>th</sup> November 2023**.

If you have any queries regarding this Issues and Options' document please contact a member of the Plan Making team [on](tel:02083793866) 020 8379 3866

Further information on how your personal data will be used is given in the privacy notice ([add hyperlink](#)). Non personal data may be published on this website in due course.

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# 1. Introduction

- 1.1 Local planning authorities are required by Central Government to assess the accommodation needs of Gypsies and Travellers alongside the settled population, and develop a strategy that addresses any unmet need that is identified. The London Borough of Enfield is therefore preparing a Traveller Local Plan (TLP), that will assess the accommodation needs of Gypsy, Traveller and Travelling Showpeople, and set out how this need will be met over the next 15 years or more.
- 1.2 The TLP is a separate document from the Enfield Local Plan (ELP), with the ELP dealing with the accommodation needs of the settled population, as well as other matters, including employment land needs, infrastructure provision and protection of the environment.

## *Defining ‘Travellers’*

- 1.3 The term ‘Travellers’ encompasses a range of people and groups with different histories, cultures and beliefs, including: English Romany Gypsies, Irish and Scottish Travellers, European Roma, ‘New Age’ Travellers, and Travelling Showpeople.
- 1.4 For the purposes of this TLP, any reference to ‘Travellers’ encompasses the following:
- Gypsies and Travellers
  - Travelling Showpeople

- 1.5 In ‘Planning Policy for Traveller Sites<sup>1</sup>’ (PPTS, DCLG, 2015), the Government has defined Gypsies and Travellers as:

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

- 1.6 To determine whether people are “Gypsies and Travellers”, the PPTS states that 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; and
  - 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.

- 1.7 Travelling Showpeople are defined in the PPTS as:

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

- 1.8 There are three main types of Traveller sites which this TLP will consider:

- **Permanent residential sites** – these can be public, social rented sites or privately owned sites. Sites are normally made up of individual caravan pitches, with

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

amenity blocks and essential services; Travelling Showpeople plots (also known as yards) which are normally mixed use and incorporate space for the storage and repair of equipment.

- **Transit sites (or stop over sites)** – these are permanent sites used to provide only temporary accommodation to their residents.
- **Temporary (negotiated) stopping places** – these are pieces of land in temporary use as authorised short-term stopping places.

### *Purpose of the TLP*

- 1.9 The TLP will set out local planning policies specifically relating to Travellers, and once adopted will set out how the London Borough of Enfield will meet the future accommodation needs of the Traveller communities. This is likely to include the allocation of new sites and associated policies. It will also cover other related issues such as site location, size, type, tenure, management and design.
- 1.10 The TLP will form part of the Development Plan for Enfield, alongside the London Plan (2021), the North London Waste Plan (2022), the Core Strategy (2010) and the Development Management Document (2014) (the latter two of which are expected to be replaced by the emerging Enfield Local Plan in due course). Other Development Plan Documents include the North Circular Area Action Plan (2013), North East Enfield Area Action Plan (2016), Edmonton Leaside Area Action Plan (2020), and any 'Made' (adopted) Neighbourhood Plans. The TLP will apply to the whole of the borough of Enfield.
- 1.11 The purpose of this Issues and Options stage is to:
- Identify the issues the Council should address through the TLP;
  - Set out a series of potential options the Council could consider to address these issues, and
  - Obtain views from the community and stakeholders on the issues and options identified, to see if there are additional issues and options, and to help identify the preferred options which will inform the next stage of the TLP process.
- 1.12 Travellers are an important part of the community within Enfield, and the Council has a legal responsibility to assess and plan for the accommodation needs of Travellers within the Borough. As such, through the production of this TLP, the Council will ensure the provision of a sufficient supply of good quality pitches and plots for Travellers, which in turn will help address the inequalities that Travellers experience. This can also help to reduce the number of unauthorised sites and encampments, which are a source of tension between the travelling and settled communities.
- 1.13 The Council acknowledges that failure to allocate sufficient land to meet the identified needs would have a number of negative impacts, for all communities. It would make it harder to resist future speculative planning applications for the grant of temporary planning permission, and it would be more difficult to take effective enforcement action against unauthorised encampments. It could also mean that more sites are permitted through the planning appeal process. These sites may not be in the most sustainable locations, meaning that Traveller communities would not be able to access the services, facilities and support they need.

## *Timetable, Process and Progress to Date*

1.14 This Issues and Options document is the first formal stage of the TLP process. The diagram below shows how the Issues and Options document fits into the whole TLP plan-making process.

### **Add Figure - Figure 1: Indicative timetable for the Traveller Local Plan**

- 1.15 The first step in the process was to identify the accommodation needs of Gypsies and Travellers and Travelling Showpeople. The Council commissioned and published a study called the Gypsy and Traveller Accommodation Needs Assessment (GTANA), which was undertaken in October 2020. The findings of this assessment are set out in **Section 4 below**.
- 1.16 The next step in the process is for the Council to understand what sites may be available to meet the identified needs. An initial call for sites was undertaken in July 2021 as part of the emerging Enfield Local Plan work. The call for sites submission form explicitly stated that the Council were especially seeking proposals within the built-up areas of Enfield to help meet the identified Traveller need. Two sites were submitted for Traveller use. These sites will be considered in due course using the updated Site Selection Methodology which is currently being consulted upon alongside this TLP Issues and Options document.
- 1.17 In addition, the Council is also reviewing sites owned by the authority to assess if any suitable and available sites can be put forward as part of this TLP.
- 1.18 As part of the consultation on this Issues and Options document, the Council is making a further call for sites potentially suitable for meeting Gypsy and Traveller Needs.
- 1.19** Any sites put forward, along with potential sites and locations identified by the Council, will then need to be subject to assessment, using the Council's agreed Traveller Site Assessment Methodology (**see paragraphs 2.19 – 2.21 below**).

## *Consultation*

- 1.20 This Issues and Options document is the first in a series of consultation documents that the Council will produce. The consultation on this Issues and Options document seeks to stimulate discussion with local communities (including the Traveller communities), statutory bodies and other stakeholders to understand views, ideas and concerns in relation to the issues and options raised.
- 1.21 Community involvement will follow the pattern set out in the Council's adopted Statement of Community Involvement (SCI) 2023<sup>2</sup>. The Council's SCI ensures that all sections of the community, including local voluntary and community groups and organisations, key stakeholders, service providers, landowners, individuals and developers, are actively involved throughout the process of preparing planning documents, including the TLP. It will be particularly important to involve Travellers, and the groups which represent them, throughout the TLP process.
- 1.22 The Council does host a Gypsy, Roma, Traveller, Boater and Showman (GRTBS) Project Board, which supports the Borough's strategic approach to GRTBS communities in Enfield. The GRBTS board is developing a vision and accompanying action plan to improve the lives of the GRTBS community, which includes tackling inequality in housing.

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<sup>2</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0018/38025/Statement-of-Community-Involvement-Revised-2023-Final-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0018/38025/Statement-of-Community-Involvement-Revised-2023-Final-Planning.pdf)

- 1.23 It will be important to coordinate the work of the GRTBS Project Board with the work on the TLP, including in relation to the assessment and delivery of potential sites to meet Traveller needs.
- 1.24 More information about the GRTBS Project Board can be found at:  
<https://www.enfield.gov.uk/services/your-council/grt>
- 1.25 Further public consultation at the Draft TLP stage and again on the Proposed Submission version of the TLP are expected to take place. At the submission stage, the consultation must be limited to inviting formal representations to be made on the 'soundness' of the Plan for the appointed independent Inspector to consider at the examination.
- 1.26 The Council is now seeking views on whether the issues and options as set out within this document have been correctly identified. You are encouraged to use the questions to guide any response that you wish to make. The questions are highlighted in green text boxes for ease of reference. This Issues and Options document is supported by supporting evidence base documents, which you are also invited to make comments on. These include:
- Gypsy and Traveller Accommodation Needs Assessment (GTANA) (October 2020)
  - Integrated Impact Assessment (June 2023)
  - Updated Traveller Site Selection Methodology (June 2023)
- 1.27 Please see the section at the start of this document entitled 'consultation details' for more details on how to respond. All comments must be received by **5pm on Monday 13<sup>th</sup> November 2023**.
- 1.28 All comments received will be reviewed and considered. This information will be taken into account in the preparation of the draft TLP stage and the proposed submission version of the TLP, which we expect to be published for consultation in **the Spring of 2024**.

**Question 1: Do you know of any specific individuals or groups that the Council should directly consult with as part of this TLP process?**

## 2. Context

### *Travellers in Enfield*

- 2.1 Enfield has a rich history of Travellers and it is believed that there was a sense of belonging in the Borough documented as early as 1898. Edmonton is an area that had a large Traveller community, particularly in the 1980's and 1990's. Families have still remained locally although some have move to neighbouring boroughs. The 2021 census reports a total of 373 people who identify as Gypsies and Travellers and 1,121 who identify as Roma. This is a three-fold increase in the 121 Gypsy and Travellers reported in the 2011 census. Currently there are over 600 families from Gypsy, Roma and Travelling communities in temporary and private rented accommodation in Enfield.

### *Policy Context*

- 2.2 The Equality Act of 2010<sup>3</sup> provides protection from discrimination based upon, amongst other things, race. The courts have established that because of their ethnic group, Romany Gypsies and Irish Travellers are protected against race discrimination under the Equality Act.
- 2.3 The Housing Act 2004<sup>4</sup> requires Local Authorities to include Travellers in their accommodation assessments and to take a strategic approach, including drawing up a strategy demonstrating how the accommodation needs of Travellers will be met, as part of their wider housing strategies.

### National Planning Policy

- 2.4 Paragraph 62 of the National Planning Policy Framework (NPPF) (2021)<sup>5</sup>, states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes accommodation for Travellers.
- 2.5 In August 2015 the Government published its amended Planning Policy for Traveller Sites (PPTS)<sup>6</sup>, which replaced the previous guidance and circulars relating to Gypsy and Travellers and Travelling Showpeople. The guidance emphasises the need for local authorities to use evidence to plan positively and manage development. This guidance also provided a formal definition for Gypsies and Travellers and Travelling Showpeople which can be found at **Appendix 1** of this Issues and Options document.
- 2.6 Policy B in paragraph 10 (of the PPTS) states that Local Planning Authorities (LPA's) should, in producing their Local Plan:
- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
  - identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 years;
  - consider production of joint development plans that set targets on cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area;

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<sup>3</sup> <https://www.legislation.gov.uk/ukpga/2010/15/contents>

<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2004/34/contents>

<sup>5</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>6</sup> <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>



- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding populations size and density; and
  - protect local amenity and the local environment.
- 2.7 Policy B in paragraph 13 (of the PPTS) also states that LPA's should ensure that traveller sites are sustainable, socially and environmentally. LPA's should, therefore, ensure that their policies:
- promote peaceful and integrated co-existence between the site, and the local community;
  - promote, in collaboration with commissioners of health services, access to appropriate health services ensure that children can attend school on a regular basis;
  - provide a settled base that reduces both the need for long distance travelling and possible environmental damage caused by unauthorised encampment;
  - provide for proper consideration of the effect of local environmental quality (such as noise and air quality) on the health and well-being of any travellers that may locate there or on others as a result of new development;
  - avoid placing undue pressure on local infrastructure and services;
  - do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans; and
  - reflect the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability.
- 2.8 Policy C in paragraph 14 (of the PPTS) states that when assessing the suitability of sites in rural or semi-rural settings, LPA's should ensure that the scale of such sites does not dominate the nearest settled community.
- 2.9 Policy E in paragraphs 16 and 17 (of the PPTS) state that Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances. It adds that if a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary to meet a specific, identified need for a traveller site, it should do so only through the plan-making process.
- 2.10 Policy F in paragraph 18 (of the PPTS) states that LPA's should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents. LPA's should consider the scope for identifying separate sites for residential and for business purposes in close proximity to one another if mixed sites are not practical.

### London Planning Policy

- 2.11 The London Plan (2021)<sup>7</sup>, Policy H14, addresses Gypsy and Traveller accommodation. It states that Boroughs should 'actively plan' for Traveller's accommodation needs, and should ensure that new sites are well-connected to social infrastructure, health care,

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<sup>7</sup> <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021>

education and public transport facilities, and contribute to a wider, inclusive neighbourhood. The TLP should be read in conjunction with Policy H14 of the adopted London Plan.

- 2.12 Policy H14 states that Boroughs should undertake a needs assessment as part of their Local Plan review processes (see paragraphs 2.17 – 2.18 below).
- 2.13 The London Plan also states that The Mayor will initiate and lead a London-wide Gypsy and Traveller Accommodation Needs Assessment, and will work to support boroughs in finding ways to make provision for Traveller accommodation. It is understood that work on the London-wide Gypsy and Traveller Accommodation Needs Assessment has commenced but is not yet complete. Any publication of data from this assessment will be considered in due course and incorporated into further stages of this TLP, noting that the overall need for Enfield may change.

### Local Planning Policy

- 2.14 Enfield's Core Strategy (2010 - 2025) was adopted in 2010<sup>8</sup>. Policy 6 - 'Meeting Particular Housing Needs' specifically addresses Gypsies and Travellers by providing a criteria based policy for the location of new Gypsy and Traveller sites. The TLP should be read in conjunction with Policy 6 of the adopted Core Strategy.
- 2.15 Enfield are currently producing a new Local Plan (2019 – 2039)<sup>9</sup>. This emerging draft Local Plan was last consulted on in the Summer of 2021. Policy DM H8 sets out that the Council will address the need for Travellers through the TLP. It also sets out criteria for proposals brought forward for transit and permanent pitches, and commits to continued cooperation with neighbouring local planning authorities, to ensure that the appropriate demand is identified and provision made. The Council intend to publish the Proposed Submission Local Plan (Regulation 19) in the winter of 2023.
- 2.16 There are no 'Made' Neighbourhood Plans within Enfield. One Neighbourhood Area has been designated in Hadley Wood. This Neighbourhood Plan was formally submitted to the Council in December 2022. The Neighbourhood Plan as drafted has no policies relating to Gypsies and Travellers, and does not allocate land for the provision of Travellers. An examination in public took place in June and July 2023, with the Referendum expected to take place in later 2023... (update later as examination will have taken place by September and may potentially have been made).

### *Evidence to support the TLP*

#### Gypsy and Traveller Accommodation Needs Assessment

- 2.17 A Gypsy and Traveller Accommodation Needs Assessment (GTANA) was commissioned by Enfield Council and undertaken by specialist consultants arc4. This was published in October 2020. The need set out within this assessment relates not just to numbers, but to type, size, tenure and location. This assessment was based on a review of existing data, an online survey of key stakeholders and interviews with Traveller households.
- 2.18 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

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<sup>8</sup> [https://www.enfield.gov.uk/data/assets/pdf\\_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0015/4623/planning-policy-information-the-enfield-plan-core-strategy-november-2010.pdf)

<sup>9</sup> <https://www.enfield.gov.uk/services/planning/new-enfield-local-plan>

did not evidence any need for additional Travelling Showperson plots in the Borough. Provision of a transit site/stop over site 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.

### Traveller Site Assessment Methodology / Traveller Land Availability Assessment

- 2.19 The Council has prepared a draft Traveller Site Assessment Methodology setting 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 Housing and Employment Land Availability Assessment (HELAA) that supports the emerging Enfield Local Plan.
- 2.20 The draft Traveller Site Assessment Methodology was consulted on in the summer of 2021 alongside the emerging Enfield Local Plan. Comments received have now been considered and the draft Traveller Site Assessment Methodology has been updated and published alongside this Issues and Options document as part of the evidence base. The Council would welcome any further views on the draft methodology as part of this Issues and Options consultation.
- 2.21 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 Assessment Methodology.

### Integrated Impact Assessment (IIA)

- 2.22 An Integrated Impact Assessment (IIA) has been carried out to support the development of this Issues and Options Document. The IIA promotes sustainable development by assessing the extent to which the emerging TLP, when judged against 'reasonable alternatives', will help to achieve relevant environmental, economic and social objectives. The IIA will be updated to inform each stage of the TLP as it develops.
- 2.23 IIAs incorporate the Strategic Environmental Assessment (SEA) Regulations<sup>10</sup>, which implement the requirements of the European Directive 2001/42/EC<sup>11</sup>. Land Use Consultants (LUC) have been appointed to carry out the IIA (which incorporates the Sustainability Appraisal / Strategic Environmental Assessment, a Health Impact Assessment, Equalities Impact Assessment and a Community Safety Impact Assessment) for the TLP.
- 2.24 LUC have produced a draft IIA Scoping Report which is now subject to consultation with Historic England, Natural England and the Environment Agency. The Scoping Report identifies the scope and level of detail of the information to be included in the IIA Report. It also sets out the context, objectives and approach of the assessment, and identifies relevant environmental, economic and social issues and objectives, and a high level initial options appraisal. The IIAs are available on the Council's website alongside this Issues and Options document.
- 2.25 At future stages, the IIA will evaluate alternative site allocation options and draft policies, using a similar approach to that used for the emerging Enfield Local Plan. Sites will be assessed against a number of social, environmental and economic objectives and indicators in order to test their sustainability.

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<sup>10</sup> <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

<sup>11</sup> <https://www.legislation.gov.uk/eudr/2001/42/adopted>

- 2.26 The Conservation of Habitats and Species Regulations 2010 (as amended)<sup>12</sup> are commonly referred to as the “Habitats Regulations”. The TLP is required to be accompanied by a Habitats Regulation Assessment (HRA), if it is considered likely to have significant effects on European habitats or species, either alone or in combination with other plans or projects.
- 2.27 Although not in Enfield itself, the Epping Forrest Special Area of Conservation (SAC) has a ‘Zone of Influence’ which includes areas to the east of Enfield. As such, development within this zone will require mitigation measures. This includes the consideration of Suitable Alternative Natural Greenspace (SANG) within policies and site allocations as part of the TLP..

### Equalities Impact Assessment (EqIA)

- 2.28 An Equalities Impact Assessment (EqIA) has been carried out to support the production of the TLP. The purpose of the EqIA is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.
- 2.29 The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.
- 2.30 The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. No negative impacts from an equality perspective were identified for any of the protected groups as a result of this Issues and Options document.
- 2.31 The EqIA for the TLP is available on the Council website alongside this Issues and Options document.

**Question 2: Have we correctly identified the evidence needed to support the TLP, or is additional evidence required?**

**Question 3: Do you have any specific comments on the following evidence base documents:**

- a) GTANA
- b) Draft Traveller Site Selection Methodology
- c) IIA
- d) EqIA

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<sup>12</sup> <https://www.legislation.gov.uk/uksi/2010/490/contents/made>

### 3. TLP Aims and Objectives

3.1 The emerging Enfield Local Plan (ELP)<sup>13</sup> sets out the long-term vision for the Borough. It describes Enfield as a place for affordability and accessibility, a place for opportunity and enterprise, a place for diversity and equality and a place that delivers. The vision for the Borough stands for all communities and as such a separate vision for this TLP is not considered necessary. The TLP will however set out specific aims and objectives as these are required to deliver and monitor the effectiveness of the TLP.

#### *The Aims*

3.2 The proposed aims for the TLP are as follows:

- To provide a sufficient mix of, and type of, sustainable and high-quality sites, which are distributed evenly across the Borough to fully meet the assessed accommodation needs of the Traveller communities.
- To provide Traveller sites that are located in areas that provide protection from flooding and enable adequate access to public transport, community facilities such as schools, health centres and shops.
- To reduce the number of unauthorised developments and encampments, and increased integration between the Traveller communities and the settled community.
- To protect and enhance the special built and natural character of the Borough, including its countryside, open space, Green Belt, and historic environment.

**Question 4: Are the proposed aims appropriate for the TLP, or are there additional / alternative aims which need to be considered?**

#### *The Objectives*

3.3 The proposed Objectives for the TLP flow from the issues identified and support the delivery of the TLP aims set out above. Importantly, the proposed objectives provide the basis for a monitoring framework, which will allow the effectiveness of the TLP to be monitored over time. The TLP objectives are as follows:

- At least 21 permanent Traveller pitches and a transit / stop over site will be delivered during the plan period to meet the identified Borough need.
- Sites will be delivered in sustainable, suitable and safe and locations within Enfield, with high quality on-site provision specifically designed for Gypsy and Traveller use, and will have good access to facilities and services.
- To use a negotiating stopping policy to meet the short-term needs of Travellers passing through the Borough and expand the number of negotiated stopping places which can be used.
- A clear framework will be provided for making decisions on future planning applications for Traveller sites within the Borough.

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<sup>13</sup> [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0026/17882/Enfield-Local-Plan-Reguation-18-Issues-and-Options-consultation-2018-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0026/17882/Enfield-Local-Plan-Reguation-18-Issues-and-Options-consultation-2018-Planning.pdf)

**Question 5: Are the proposed objectives appropriate for the TLP, or are there additional / alternative objectives which need to be considered? Please provide information if so.**

## 4. TLP Issues and Options

4.1 TLP must consider. The issues are followed by a number of options which should be considered to take the TLP forward.

**Figure 2: Issues for Enfield - Add schematic of all the issues here**

### Plan Period

4.2 One option that must be considered is the time period covered by the TLP. The GTANA looks up to 2036. However, the NPPF states that “strategic policies should look ahead over a minimum 15 year period from adoption”. The TLP is not expected to be adopted until 2025 at the earliest, as set out in the Council’s Local Development Scheme (LDS)<sup>14</sup> (May 2023). It is also noted that the plan period for the emerging Enfield Local Plan is currently 2020 - 2039 and the plan period for the adopted London Plan is (2019 – 2041). The options that the Council needs to consider in relation to the end date of the TLP are set out below:

**Table 4.1: Options for the TLP plan period**

Option	Description	Advantages	Disadvantages
1	Plan end date of 2036	End date would be in line with GTANA evidence of need (up to 2036)	Less than 15 years from adoption, contrary to national policy (NPPF).  The TLP would not align with the emerging Enfield Local Plan (2020 – 2039) or the adopted London Plan (2019 – 2041)
2	Plan end date of 2039	End date would align with emerging Enfield Local Plan (2020 – 2039)	Just less than 15 years from adoption, contrary to national policy (NPPF).  The TLP would not align with the London Plan (2019 – 2041)  GTANA will require an update to include ‘need’ for a further 2 years.
3	Plan end date of 2041	End date would be NPPF compliant	The TLP would not align with the emerging Enfield Local Plan (2020 – 2039) as the plan period currently stands

<sup>14</sup> <https://www.enfield.gov.uk/services/planning/local-development-scheme#local-development-scheme>

Option	Description	Advantages	Disadvantages
		The TLP would align with the adopted London Local Plan (2019 – 2041)	GTANA will require an update to include 'need' for a further 4 years.

**Question 6: Which end date should the council proceed with, or is there an alternative plan period which should be considered? If so, please explain.**

### *Current provision and activity*

- 4.3 The 2021 census reports a total of 373 people in Enfield who identify as Gypsies and Travellers and 1,121 who identify as Roma. There are no existing authorised Traveller sites in the Borough (with full or temporary permission), either privately owned, or owned by the Council. There are no transit sites or temporary stopping places in the Borough at present. Since 2020, consent has been granted for a number of temporary stop over places further to the implementation of the Council's negotiated stopping policy with durations ranging from 3-10 days on average. As there are no pitches in the Borough, the bi-annual Ministry of Housing, Communities & Local Government (now known as the Department for Levelling Up, Housing and Communities) Traveller caravan count reports no occupied pitches.
- 4.4 The lack of current provision for the Traveller community has in part been due to the lack of evidence of need. As part of the preparation of the Local plan for Enfield, an updated GTANA was prepared which highlighted an updated need for 21 - 23 pitches (see paragraph 4.11 below for further information).
- 4.5 A site in Montagu Road, Edmonton previously provided pitches for the Traveller community, however this site was closed in 2009, with the occupants displaced into traditional bricks and mortar accommodation. The 2020 GTANA addresses the issues of Traveller households living in bricks and mortar, and provides an up to date picture of the existing need for Traveller sites within the Borough. As such, the Council is now required to address and meet this need.

### *Unauthorised encampments*

- 4.6 An unauthorised encampment is a group of people with vehicles who are trespassing on land with the intention of residing there without the owner's permission. Trespass is a civil act and it is for the landowner to seek repossession of their property via civil court procedures.
- 4.7 Enfield Council recognise the need to provide land to accommodate Travellers passing through the Borough using Negotiating Stopping arrangements.
- 4.8 Unauthorised encampment activity is a good indicator of transit need. The evidence provided as part of the GTANA (which reviewed the period between October 2019 to August 2020) showed that the number of caravans on unauthorised encampments had ranged between 4 and 10 during that time. There is no public transit provision within London as a whole which is exacerbating the unauthorised encampment activity.

### *Cultural and 'PPTS' need*

- 4.9 The GTAA establishes an overall 'cultural' need for pitches which accords with the overall need for Gypsy and Traveller culturally appropriate accommodation and

considers the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 section 124. Within this overall need, the specific need from households who meet the nomadic habit of life definitions (set out in Annex 1 of the PPTS) is identified.

- 4.10 This planning definition has been challenged and through case law has been expanded to include those who are unable to travel, for instance through illness or disability. The issue is whether the council should seek to meet its overall cultural need of 23 pitches or the slightly lower PPTS need of 21 pitches. Meeting the higher need would accord with the council’s wider obligations to meet all need.

**Question 7: Should the TLP seek to only provide for the accommodation needs of those who still travel (21 pitches) or should it also seek to include the needs of those who culturally identify themselves as Travellers but who are not travelling (a further 2 pitches) giving a total requirement of 23 pitches.**

### *Identified Traveller need*

#### Permanent Residential Need

- 4.11 In the period to 2036 the GTANA has evidenced a cultural shortfall (the need across the Travelling communities) of 23 pitches, of which there is a need for 21 pitches from households who meet the criteria as set out in Annex 1 of the PPTS. Crucially there is a need for 16 pitches within five years, of which there is an immediate need from 9 households in bricks and mortar who require a pitch. The need is broken down into time periods as follows:

**Table 4.2: Enfield pitch need to 2036**

	<b>Cultural need</b>	<b>PPTS need</b>
5yr Authorised Pitch Shortfall (2020/21 to 2024/25)	16	15
Longer-term need (2025/26 to 2035/36)	7	6
<b>TOTAL NET SHORTFALL 2020/21 to 2035/36</b>	23	21

- 4.12 The potential policy options for delivering the identified needs for permanent Traveller pitches are set out in **Table 4.3 below**.

#### Travelling Showpeople Need

- 4.13 There is currently no Travelling Showpeople provision in Enfield. The 2008 London Boroughs’ Gypsy and Traveller Accommodation Needs Assessment<sup>15</sup> had identified a need for 3 plots in Enfield over the period 2007-2017 but the Council has had no

<sup>15</sup>

[https://www.london.gov.uk/sites/default/files/london\\_boroughs\\_gypsy\\_and\\_traveller\\_accommodation\\_needs\\_assessment\\_-\\_final\\_report\\_-\\_2008\\_-\\_fordham\\_research.pdf](https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf)



applications for plots since 2007. The Enfield GTANA has not evidenced any need for Travelling Showperson plots in the Borough, however the Council is aware of interest in plots locally. Any need over the Plan period is likely to be expressed through planning applications for Showperson plots. The GTANA recommended that the TLP includes a criteria-based policy for the delivery of Showperson plots, if this need arises, over the Plan period.

### **Question 8: Should the TLP provide a criteria based policy for Travelling Showpeople plots?**

#### Transit Provision

- 4.14 There is currently no transit site provision in Enfield Borough. Based on the views of Travellers in the Borough and evidence of unauthorised encampment within the GTANA, it is recommended that the TLP consider developing capacity for families travelling through the Borough. Provision of a transit site/stop over site for 6 pitches was recommended, which could accommodate up to 12 caravans at one time. The GTANA also recommended consideration of a negotiated stopping policy to manage unauthorised encampment activity across the Borough. Transit provision and the idea of a negotiated stopping policy are covered in more detail in [paragraph 4.28](#) below.

**Table 4.3: Policy options to deliver the identified permanent need**

Option	Description	Advantages	Disadvantages
1	<p><b>Allocate small new sites</b> – e.g. several small sites consisting of 6 to 8 pitches across the Borough. This could be done within the urban areas and / or more rural areas.</p>	<p>This would meet the needs of individual family groups and avoid potential conflicts.</p> <p>Could provide even provision across the Borough and integrate with the locality.</p> <p>Small sites could make good use of small areas of land, especially in urban areas, which would have good access to services and facilities.</p>	<p>Introducing Traveller sites into existing communities could be contentious.</p> <p>Smaller sites are more likely to be privately owned and therefore may not be affordable.</p>
2	<p><b>Allocate one large site</b> – (either 21 pitches or 23 pitches – depending on what need is chosen to be met). This could be done on rural sites close to settlements.</p>	<p>The allocation of one large site would not be in accordance with good practice. If they are ‘rural exception’ sites, they could be affordable and retained in perpetuity for people with local connections.</p>	<p>Introducing Traveller sites into an existing community could be contentious.</p> <p>This would likely be outside of settlements, in less accessible locations.</p> <p>Larger sites could be less desirable to the Traveller communities.</p>
3	<p><b>Provide pitches as part of large housing developments</b> - Require large new housing developments (e.g. 500 dwellings or more) to provide a proportion of affordable</p>	<p>This would help to create sustainable, mixed communities.</p> <p>Such sites could be designed to integrate well with the settled housing and could</p>	<p>This approach is likely to be resisted by larger developers.</p> <p>Less likely to meet 5-year requirement (given the time it takes for larger developments to go through</p>

Option	Description	Advantages	Disadvantages
	Traveller pitches as part of the overall scheme.	<p>be managed by a housing association as affordable pitches.</p> <p>These sites would have good access to services and facilities.</p>	the planning process, and start to deliver new homes).
4	<b>Liase with Neighbouring Local Authorities to address the identified need</b> (in part of in full)	Need could be address through the expansion of existing sites or the allocation of new sites outside of the district through the 'Duty to co-operate' process to potentially meet all or part of the need identified.	<p>The authority would need to robustly justify why need cannot be met within Enfield.</p> <p>Neighbouring authorities may not be able to meet their own need, so may not have capacity to take on additional need from elsewhere.</p>
5	<b>Do nothing</b> - rely on sites coming through the Development Management process and not allocate specific sites	N/A	<p>Council would have no control over when and when sites come forward.</p> <p>These sites may not be in the most sustainable locations.</p> <p>The Council would not have a 5 year supply of Traveller sites (and thus not meet the identified need) and as such would be vulnerable to sites being imposed through the planning appeal process.</p>

**Question 9: Which of the identified policy options above are most appropriate for the TLP? Please explain your answer.**

**Question 10: Are there any other potential policy options that have not been considered above? If so, please provide details.**

### *Location of new Traveller sites*

- 4.15 The TLP will need to consider whether new Traveller sites should be located in urban areas or more rural areas. Noting that one of the aims of the TLP is that sites should be located in areas that enable adequate access to community facilities such as schools, health centres and shops. Paragraph 16 of the PPTS explicitly states that subject to the best interest of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances. Paragraph 25 goes on to say that new Traveller site development should be very strictly limited in open countryside that is away from existing settlements.

**Question 11: Are there specific urban or rural locations or sites specifically within the east or the west of the Borough which the TLP should consider? Please provide further information if so.**

**Question 12: If allocating more than one site, how should these be distributed across the Borough? Please explain your answer**

### *Site Type, Size, Tenure and Management*

- 4.16 Types of sites will need to be considered as part of this TLP, for example in terms of their size, tenure and management. There is no one ideal size of site or number of pitches although it was suggested by stakeholders as part of the GTANA work that small sites (approximately 8 pitches) should be promoted, as this would provide a comfortable environment which is easier to manage.
- 4.17 It is also recognised that permanent sites will need to take account of the needs and demographics of families residing on them, which includes different sizes of pitches. Smaller sites of up to 5 pitches can provide for an extended family group. Sites of 6-10 pitches can provide for larger numbers of households.

**Question 12: If allocating more than one site to meet the identified permanent need, what would be an appropriate site size (in hectares) to allocate? Please explain your answer.**

**Question 13: If allocating more than one site to meet the identified permanent need, how many pitches should be allocated per site? Please explain your answer.**

- 4.18 Parts of the Borough are some of the most prosperous areas in the country with very high house prices. Many people cannot afford market housing either to buy or rent. There is no information on affordability or tenure in the GTANA. The TLP should ensure that a proportion of the new pitches are genuinely affordable, for example through providing social rented pitches.
- 4.19 This could be achieved though securing a proportion of affordable Traveller pitches as part of a large new build housing developments. It may also be possible through the inclusion of a 'rural exception sites' policy which would enable permanent sites to

come forward in areas where Traveller sites would not normally be allowed and ensure that these pitches remain affordable in perpetuity.

**Question 14: Should the TLP consider including a rural exception sites policy? If so, please explain your answer.**

- 4.20 The Council could manage the permanent sites themselves or appoint a registered social landlord (or Housing Association) to manage the sites of its behalf. Alternatively permanent sites could be privately owned and run by private landlords or the site occupiers themselves.
- 4.21 There are various different options for ownership and management of the permanent sites such as the following:

**Table 4.4: Policy options for ownership and management of the permanent sites**

Option	Description
1	Allocated land is sold to Travellers who then have the responsibility of equipping the site in the same way that this happens on privately owned sites at present.
2	Allocated sites form part of the affordable housing provided on a private housing development. In such cases the developer would in all probability put in access, land drainage, sewerage, water and electricity as a minimum. Pitches could be sold or rented but would have to remain affordable. This is usually achieved by the involvement of a Registered Social Landlord but there may be other ways of achieving this.
3	The Council or Registered Social Landlord buys allocated land, provides the facilities as per option 2 above and then sells or rents the site to the occupants. The Council or Registered Social Landlord retains a role in site management if the site is rented to the occupants.
4	The land is privately owned and rented to the occupants with or without facilities. The site owner is most likely to manage the maintenance of the site if it remains in his/her ownership.
5	A variety of means of tenure could be spread across the allocated sites.

**Question 15: Which of the above management options above is preferred? Please explain your answer.**

### *Design of new Traveller sites*

- 4.22 Paragraph 126 of the NPPF states that good design is a key aspect of sustainable development but there is limited guidance on the design of new Traveller sites. Paragraph 26 of the PPTS states that sites should be well planned or soft landscaped in a way to positively enhance the environment and increase its openness, with

adequate landscaping and play areas for children. It warns against enclosing sites with hard landscaping, high walls or fences.

- 4.23 Detailed guidance was given in 'Designing Gypsy and Traveller Sites' (DCLG, 2008)<sup>16</sup> but this document was withdrawn in 2015. Nonetheless, it contains some useful material on site layout, access and orientation of permanent sites and transit sites, as well as site services and facilities. It is essential, for example, that each pitch has an amenity building with access to mains water, electricity, a toilet/bathroom, a kitchen and a dining area. It is also important that sites provide visual and acoustic privacy both for people living on the site and those living nearby.
- 4.24 'Places we're proud of'<sup>17</sup> is a short guide to providing and managing sites for Gypsies and Travellers. It sets out why high quality sites are needed, highlights key success factors, and provides examples of good site design in action.
- 4.25 One key issue is whether the Traveller Local Plan should contain a policy to provide design requirements for new Traveller sites and if so, what matters should be covered by the policy. Examples include:
- Size / orientation of pitches
  - Site access
  - Parking provision
  - Community facilities / amenity buildings
  - Utility provision
  - Open space / children's play space provision
  - Waste storage
  - External lighting
  - Hardstanding
  - Surface water drainage
- 4.26 The GRTBS Project Board have a subsidiary group known as the 'site delivery group' whose role is to develop design concepts. Broad design concepts are being developed. The initial design concepts can be viewed here: [xxxx](#)

**Question 16: Should the TLP contain a policy relating to design requirements for new Traveller sites? If so, what matters should be included?**

### *Transit site/stop over site and negotiated stopping place*

- 4.27 A transit site provides for the needs of Gypsies and Travellers who are on the move (which remains an important part of Traveller culture) and may be used for a few days or a few weeks at a time. It should not provide permanent accommodation although there is a danger of this happening if there is a shortage of permanent sites. A transit site may require a resident site manager to ensure that the site is used correctly.

<sup>16</sup> <https://www.gov.uk/government/publications/designing-gypsy-and-traveller-sites-good-practice-guide>

<sup>17</sup> <https://www.gypsy-traveller.org/resource/national-policy-advisory-panel-places-were-proud-of/>

- 4.28 A transit site needs to have the same services as a permanent site and would therefore need land drainage, sewerage, water supply, electricity, refuse collection, utility buildings, and safe access onto a metalled road. Electricity can be provided on a metered basis. This would leave the Council with the cost of setting up and equipping the site and thereafter maintaining it and possibly paying for water and refuse collection which could be reimbursed by charging a usage fee.
- 4.29 Temporary stopping places (or stop over sites) are used by Travellers for a few nights at a time. These do not need to be equipped to the same standard as a permanent site or transit site but are still required to have planning permission. They must have safe and convenient access to the road network; provide water, electricity (which can be metered) and a portaloos for every 4 households; contain a sewerage disposal point and; facilities for refuse disposal.
- 4.30 There is currently no transit site provision in Enfield or the wider London area. There are permanent sites in neighbouring boroughs, however these are understood to be at capacity. Based on the views of Travellers in the district and evidence of unauthorised encampment, the GTANA recommends that the council consider developing capacity for families travelling through the borough.
- 4.31 Transit sites and temporary stopping places can significantly reduce unauthorised encampments and given the cost of dealing with unauthorised encampments, it is therefore considered that the provision of such sites, potentially jointly with other LPAs, should be considered further.

**Question 17: Should the TLP provide for a transit site / stop over site, and if so, what size is considered suitable?**

**Question 18: Are there specific locations or areas within the Borough that the TLP should consider for the Transit site / stop over site? Please explain your answer.**

**Question 19: Should the TLP explore negotiated stopping places in consultation with neighbouring authorities?**

**Question 20: Are there any other issues and options or matters concerning provision for travellers that should be dealt with by way of additional planning policies?**

## 5. Monitoring

- 5.1 The Council's adopted planning policies are monitored through the Annual Monitoring Report which assesses and reviews the extent to which policies in local development plan documents are being implemented. This is supplemented by the bi-annual caravan count. One of the weaknesses of a reliance on this lies in the fact that the Gypsy and Traveller caravan count uses caravans as a unit of measure whereas for planning purposes the use of pitches is more common, where a pitch may in fact include two or more caravans.
- 5.2 The aims of the TLP will assist in developing a more refined monitoring framework. A key objective of the TLP is to reduce the level of unauthorised encampments within the Borough, and to do this there is a need to ensure that our monitoring methods are appropriate and effective.

**Question 21: Do you have any comments on monitoring of the TLP, or any suggested monitoring indicators?**



## 6. Call for sites

- 6.1 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.
- 6.2 We are seeking suggestions from landowners and other interested parties for sites to assist with the preparation of this TLP.
- 6.3 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 Appendix 2 of this document, 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 Monday 13<sup>th</sup> November 2023**.

## **7. Next Steps**

- 7.1 After the closing date of this consultation, we will collate and review all of the comments received which will then inform the next stage of the TLP. Any sites put forward as part of the 'TLP call for sites' will be considered against the finalised Traveller Site Selection Methodology.
- 7.2 Once the methodology has been finalised, the Council will use it to prepare a Traveller Land Availability Assessment (TLAA). This will include a detailed assessment of potential sites.
- 7.3 In the Spring of 2024 we intend to publish our preferred options and proposed sites (as an additional Regulation 18 consultation TLP).

## Appendix 1: Definitions

### **Caravans:**

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

### **DCLG:**

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

### **Gypsies and Travellers:**

Defined by 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 dependants’ 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”.

### **Irish Traveller:**

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

### **Mobile home:**

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

### **Pitch:**

Area of land on a Gypsy/Traveller site occupied by one resident family; sometimes referred to as a plot, especially when referring to Travelling Showpeople. 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”.

### **Plot:**

See pitch

### **PPTS:**

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

### ***Roadside:***

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

### ***Romany:***

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

### ***Sheds:***

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

### ***Showpeople:***

Defined by DCLG Planning policy for Traveller sites (August 2015) as "Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above".

### ***Site:***

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

### ***Slab:***

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

### ***Stopping places:***

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

### ***Trailers:***

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

### ***Transit site:***

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

### ***Unauthorised development:***

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

### ***Unauthorised encampment:***

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

### ***Wagons:***

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

### ***Yards:***

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

### ***Negotiated stopping:***

Land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities.

## Appendix 2: Call for Sites – Response Form (2023)

### *Call for sites submission form*

As part of the TLP plan making process the Council is undertaking a further 'Call for Sites' inviting anyone with an interest in land, potential sites and broad locations for Traveller development to submit these to us for consideration. We are especially interested in sites within the built-up urban areas of Enfield.

The Council not only wants to be able to identify the land or buildings, but we also want to be able to understand the schemes that are being proposed. This will help us to assess the capacity and deliverability of such sites, and whether they are available, suitable and viable. These sites will then be assessed and if deliverable will be consulted upon in the next stage of the TL.

Please complete a submission form for each individual site that you are submitting and include a site location plan (preferably an OS Map), clearly showing the boundaries of the site outlined in red (or otherwise clearly marked). The map should show at least two named roads, to ensure that the site can be correctly identified. A postcode would also help to locate the site, even where this relates to adjacent land or buildings.

In terms of the size and capacity of proposed sites, these should be at least 0.3 ha or capable of accommodating at least 6 pitches.

Responses will be accepted on an ongoing rolling basis. However, where sites are received after work on a Traveller Land Availability (TLAA) has commenced the Council will only include sites where there are exceptional circumstances.

Submissions cannot be made anonymously, so please provide your full name and contact details. Please note that sites will be made publicly available through the TLAA and representations may be made publicly available.

Please complete to your knowledge a separate form for each site and return by email to: [localplan@enfield.gov.uk](mailto:localplan@enfield.gov.uk) quoting 'TLP Call for sites' in the subject field.

If you do not have internet access, you can post your response to:

Strategic Planning and Design Team, Enfield Council, FREEPOST, NW5036, EN1 3BR or telephone 020 8379 3866.