

**Enfield Council**

**Traveller Local Plan**  
**Integrated Impact**  
**Assessment: Scoping and**  
**Initial Options Appraisal**

**Final report**

Prepared by LUC

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**Enfield Council**

**Traveller Local Plan**  
**Integrated Impact Assessment: Scoping and Initial Options Appraisal**

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# Chapter 1

## Introduction and methodology

### Introduction

**1.1** Enfield Council commissioned LUC in May 2023 to carry out an Integrated Impact Assessment (IIA) comprising Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and Community Safety Impact Assessment (CSIA) of the Enfield Traveller Local Plan: Issues and Options (Regulation 18). As explained later in this chapter, the SA/SEA, HIA, EqIA and CSIA have been undertaken together as part of the IIA. Therefore, for simplicity within this report we mostly refer just to the IIA, which should be taken as incorporating SA/SEA, HIA, EqIA and CSIA.

**1.2** IIA is an assessment process designed to consider and report upon the significant sustainability issues and effects of emerging plans and policies, including their reasonable alternatives. IIA iteratively informs the plan-making process by helping to refine the contents of such documents, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

**1.3** The IIA report at this stage has two main purposes – firstly to establish the scope and level of detail of the assessment and secondly to appraise the initial options set out in the Issues and Options version of the Enfield Traveller Local Plan, as follows:

#### 1. Scoping

**1.4** This initial stage of the IIA aims to provide the context for and determine the scope of the IIA of the Traveller Local Plan, including setting out the framework for undertaking the subsequent stages of the IIA process. The scoping stage of the IIA is summarised below.

- Establish baseline information for the Borough and use this to identify key sustainability issues in the Borough that the Traveller Local Plan should seek to address, and the likely evolution of these issues without the Traveller Local Plan.
- Review the policy objectives of relevance to the Traveller Local Plan and IIA, specifically the international, national and sub-national policy context.
- Develop the IIA framework, comprising sustainability objectives and related criteria against which the Traveller Local Plan will be assessed.

#### 2. Initial options appraisal

**1.5** In addition to establishing the scope of the IIA, this report will provide an appraisal of the initial, high-level policy direction options identified in the Traveller Local Plan. While most of the Traveller Local Plan comprises open-ended questions regarding future policy directions, some preferred policy directions and alternatives are described or implied by certain elements of the Traveller Local Plan and so have been subjected to IIA.

### The Plan Area

**1.6** The London Borough of Enfield (LBE) lies within the north of Greater London (see **Figure 1.1**) and is home to approximately 333,000 people and 130,000 households. The Borough sits entirely within the M25, north of the River Thames. Central London is approximately 15 miles to the south. LBE shares boundaries with three other London Boroughs: Waltham Forest to the east, Haringey to the south and Barnet to the west. Enfield Borough adjoins the counties of Hertfordshire and Essex to the north and east, respectively. It is also positioned within the London-Stansfeld-Cambridge Innovation Corridor.

**1.7** LBE is faced by a significant number of planning constraints, specifically the Green Belt which covers 3,000ha (37%) of the Borough, Metropolitan Open Land which covers 249ha of the Borough and over 400ha of industrial land, of which

approximately 326ha is classified as Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). There are also a number of environmental constraints towards the east of the Borough.

## Enfield Council's Traveller Local Plan

**1.8** Enfield Council's Traveller Local Plan will set out local planning policies specifically relating to Travellers, including how land may be used, what will be built and where to benefit the Traveller community. The overarching purpose of the Traveller Local Plan is to help Enfield Council meet the future accommodation needs of this community and deal with issues relating to the location of sites, their size, the type of accommodation, tenure, management and design. There are three main types of Traveller sites that the Traveller Local Plan will consider: permanent residential sites; transit sites (or stop over sites); and temporary (negotiated) stopping places.

**1.9** For the purposes of this IIA, any reference to 'Travellers' encompasses the following:

- Gypsies and Travellers; and
- Travelling Showpeople.

**1.10** The production of the Traveller Local Plan will ensure the Council provides a sufficient supply of good quality pitches and plots for Travellers, which in turn will help address the inequalities that Travellers experience. The Traveller Local Plan will also help to reduce the number of unauthorised sites and encampments, which are a source of tension between Travelling and settled communities.

**1.11** In addition to producing the Traveller Local Plan, Enfield Council is also producing their new Local Plan, which will cover the period to 2039. The emerging Local Plan contains a policy acknowledging the need and commitment to produce the Traveller Local Plan. Once published, the Traveller Local Plan will form part of the Development Plan for Enfield, as further described in **Chapter 2**.

### Gypsy and Traveller Accommodation Needs Assessment 2020

**1.12** As summarised in **Table 1.1**, the Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2020<sup>1</sup> identifies an overall need for 23 pitches in Enfield, of which 21 is the need from households who meet the travelling definitions set out in Annex 1 of the Planning Policy for Traveller Sites (PPTS)<sup>2</sup>. Of these 23 pitches, evidence indicates that there is an immediate need for 9 pitches (from existing households wanting to move onto a pitch) and an additional need from emerging households for 7 pitches within five years. Currently, no authorised pitches or sites for Travellers exist within Enfield.

**Table 1.1: London Borough of Enfield pitch need to 2036**

	Cultural need <sup>3</sup>	PPTS need
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>	<b>23</b>	<b>21</b>

## Sustainability Appraisal and Strategic Environmental Assessment

**1.13** Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Local Plan documents. For these documents it is also necessary to conduct an environmental assessment in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). As set out in the explanatory Memorandum accompanying the Brexit amendments, they are necessary to ensure that the law functions correctly following the UK's exit from the EU. No

<sup>1</sup> Arc4 (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf))

<sup>2</sup> DLUHC (2015). Planning Policy for Traveller Sites. (see <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>)

<sup>3</sup> The 'cultural' need for pitches accords with the overall need for the Travelling community, taking into account the Human Rights Act 1998, the Equalities Act 2010 and the Housing and Planning Act 2016 (section 124)

substantive changes are being made by this instrument to the way the SEA regime operates. Therefore, the SEA Regulations remain in force, and it is a legal requirement for Enfield's Traveller Local Plan to be subject to SA and SEA throughout its preparation.

**1.14** The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the Government's Planning Practice Guidance<sup>4</sup>), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA/SEA process – this is the process that is being undertaken for Enfield's Traveller Local Plan, and within this report the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'. In addition to SA/SEA, further impact assessments are being carried out on the Traveller Local Plan as described below, therefore, instead of 'SA' and 'Sustainability Appraisal Report', the term IIA and Integrated Impact Assessment are being used in this report.

**1.15** The IIA process comprises a number of stages, as shown below.

**Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.

**Stage B:** Developing and refining options and assessing effects.

**Stage C:** Preparing the Sustainability Appraisal (or 'IIA') Report.

**Stage D:** Consulting on the Local Plan and the SA (IIA) Report.

**Stage E:** Monitoring the significant effects of implementing the Local Plan.

## Health Impact Assessment

**1.16** Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues have been included as part of the IIA process and in this way the HIA of the Traveller Local Plan is being carried out as part of the IIA. Recommendations will be made in relation to how the health-related impacts of the Traveller Local Plan can be optimised as the options are developed into detailed policies and site allocations.

## Equalities Impact Assessment

**1.17** The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

**1.18** In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, an EqIA is being carried out as part of the IIA, setting out how the Traveller Local Plan is likely to be compatible or incompatible with the requirements of the Equalities Act 2010.

**1.19** In addition to incorporating EqIA within this IIA, Enfield Council has produced a separate standalone EqIA that incorporates the findings of the IIA.

## Community Safety Impact Assessment

**1.20** The purpose of the Community Safety Impact Assessment (CSIA) will be to ensure that the Traveller Local Plan's vision, objectives, policies, and sites do not have a detrimental impact on community safety and, where possible, improve the existing situation.

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<sup>4</sup> DLUHC and MHCLG (live). Planning Practice Guidance. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)

**1.21** The CSIA will be undertaken in accordance with the requirements of the Crime and Disorder Act 1998 and the Police and Justice Act 2006, as amended, and will fulfil the requirement to carry out a review of the levels and patterns of crime, disorder and community safety in the area when developing a strategy or plan.

## Habitats Regulations Assessment

**1.22** The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007<sup>5</sup>. The currently applicable version is 'The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)<sup>6</sup> (hereafter referred to as the 'Habitats Regulations'). When preparing the Traveller Local Plan, the Council is therefore required by law to carry out an HRA, and because it is a separate legal requirement to the IIA, it is being undertaken and reported separately from the IIA.

**1.23** The purpose of the HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site. The Council can commission consultants to undertake HRA work on its behalf and the work documented in separate HRA reports is then sent to and considered by the Council as the 'competent authority'. The Council will consider the HRA and may only progress the Traveller Local Plan if it considers that it will not adversely affect the integrity of any European site or have a significant effect on qualifying habitats or species for which the European sites are designated for, or if Imperative Reasons of Overriding Public Interest (IROPI) are identified. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance (PPG).<sup>7</sup>

**1.24** The HRA findings, once available, will be considered in the IIA where relevant, for example to inform judgements about the likely effects of potential development locations on biodiversity.

## Methodology

### Approach to IIA scoping

**1.25** The scoping stage of IIA involves understanding the social, economic and environmental baseline for the Plan area, as well as the sustainability policy context and key sustainability issues, and using these to inform the appraisal framework. There are five tasks involved in the IIA scoping stage.

- Stage A1: Setting out the policy context for the IIA of Enfield Council's Traveller Local Plan (key Government policies and strategies that influence what the Traveller Local Plan and IIA need to consider).
- Stage A2: Setting out the baseline for the IIA of the Traveller Local Plan, the current and likely future environmental, social and economic conditions in the Borough.
- Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Traveller Local Plan and IIA should address.
- Stage A4: Drawing on A1, A2 and A3, develop a framework of IIA objectives and assessment criteria to appraise the constituent parts of the Traveller Local Plan in isolation and in combination.
- Stage A5: Consulting on the scope of the IIA.

**1.26** This Scoping and Initial Options Appraisal Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Traveller Local Plan in isolation and in combination. In accordance with national Planning Practice Guidance (PPG), published online by the Government, the report should be proportionate and relevant to Enfield's Traveller Local Plan, focussing on what is needed to identify and assess the likely significant effects.

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<sup>5</sup> The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London

<sup>6</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London

<sup>7</sup> UK Government (2019). Guidance: Appropriate assessment. (see <https://www.gov.uk/guidance/appropriate-assessment>)

## Approach to identification and appraisal of initial options

**1.27** A lot of the Traveller Local Plan is of an opinion seeking nature, asking open-ended questions about future policy directions so as to 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 Traveller Local Plan process. Clear preferred policy directions and alternatives are described or implied by certain elements of the document and so will be subjected to IIA. These options are summarised below.

### ■ Chapter 3: Traveller Local Plan Aims and Objectives

- The Aims; and
- The Objectives.

### ■ Chapter 4: Traveller Local Plan Issues and Options

- Options for number of pitches to be provided (Q7);
- Policy options for delivering the identified need (table preceding Q9);
- Whether to allocate a larger number of smaller sites or vice versa (Q12-13);
- Whether or not to include a rural exception sites policy (Q14);
- Options for ownership and management of sites (table preceding Q15);
- Whether or not to include a design policy (Q14); and
- Whether or not to provide for a transit site / stop over site (Q17).

**1.28** These options and their alternatives were derived by Enfield Council from the Gypsy and Traveller Accommodation Needs Assessment 2020, which in addition to setting out the accommodation needs of Travellers across the Borough, also sets out some wider issues. These issues arose during the stakeholder consultation exercise undertaken as part of the study, which involved telephone interviews with Travellers and council officers in neighbouring local authorities and advocacy groups. Enfield Council explored the issues raised to identify how, where and when need should be addressed, whilst also using Planning Policy for Traveller Sites (2015) to inform their choice of options. Enfield Council undertook due diligence to ensure they had considered all of the relevant options by reviewing similar Issues and Options Traveller Local Plans from other local planning authorities. Finally, they sought views internally from appropriate officers on their draft document, in addition to sharing it with the Gypsy, Roma, Traveller, Boater and Showman Project Board<sup>8</sup>. This enabled them to finalise the various options prior to consultation.

**1.29** IIA of the options listed above has been carried out and provided in this report. Likely significant effects, both positive and negative, have been presented where possible at this early stage of the IIA (cumulative effects, for example, are more able to be assessed once decisions have been made about which combinations of options to take forward in the next iteration of the Traveller Local Plan). The IIA findings are set out in **Chapter 6** of this report along with recommendations for mitigating potential negative effects and maximising potential benefits of the Traveller Local Plan.

**1.30** The options listed above have been appraised against the IIA objectives in the IIA framework, with symbols being attributed to each option to indicate their likely effects on each IIA objective as shows in **Figure 1.2**. Development of an assessment framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The IIA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. An explanation of the development of the IIA framework for the Traveller Local Plan is provided further ahead in **Chapter 5**.

**1.31** The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of these symbols. The dividing line in making a decision about the significance of an effect is often quite small. Where either

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<sup>8</sup> The purpose of the Gypsy, Roma, Traveller, Boater and Showman Project Board is to bring together a cross-section of the community, including professionals, Gypsy, Roma, Traveller, Boater and Showman (GRTBS) advocates, and GRTBS members, to proactively support GRTBS residents in Enfield. The focus of the Board is to: (1) improve the quality of health; (2) improve education; (3) improve housing; and (4) enhance community development initiatives.



(++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the IIA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. Where a potential positive or negative effect is uncertain, a question mark has been added to the relevant symbol (e.g. +? or -?) and the symbol colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

**1.32** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the IIA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

**Figure 1.2: Key to symbols and colour coding used in the IIA**

++	Significant positive effect
++/-	Mixed significant positive and minor negative effect
+	Minor positive effect
0	Negligible effect
-	Minor negative effect
--/+	Mixed significant negative and minor positive effect
--	Significant negative effect
++/--	Mixed significant positive and significant negative effect
+/-	Mixed minor positive and minor negative effect
?	Uncertain effect
N/A	Not applicable

#### Difficulties and data limitations

**1.33** The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

"...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."

**1.34** The high-level nature of the policy options meant that at times it was difficult to assess in detail the likely effects of the options on each IIA objective. Once policies have been worked up in more detail, it should be possible to draw more certain conclusions about their likely effects and make recommendations on how policy options might be worded to improve their sustainability performance.

### Meeting the requirements of the SEA Regulations

**1.35** **Table 1.2** signposts the relevant sections of this Scoping and Initial Options Appraisal Report that are considered to meet the SEA Regulations requirements. This table will be included in the IIA report at each stage of the IIA to show how the requirements of the SEA Regulations have been met through the IIA process.

**Table 1.2: Meeting the requirements of the SEA Regulations**

SEA Regulations requirements	Where covered in this report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	<b>Chapters 1 and 2</b>
b. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	<b>Chapter 3</b>
c. The environmental characteristics of areas likely to be significantly affected.	<b>Chapter 3</b>
d. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	<b>Chapter 4</b>
e. The environmental protection, objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	<b>Chapter 2</b>
f. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	<b>Chapter 6</b> in relation to the effects of initial options for the Traveller Local Plan; will be considered in more detail at a later stage in the IIA process
g. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Requirement will be met at a later stage in the IIA process
h. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	<b>Chapter 1</b>
i. A description of measures envisaged concerning monitoring in accordance with Reg. 17.	Requirement will be met at a later stage in the IIA process
j. A non-technical summary of the information provided under the above headings.	Requirement will be met at a later stage in the IIA process
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).	The IIA report at each stage will adhere to this requirement

SEA Regulations requirements	Where covered in this report
Consultation requirements	
<ul style="list-style-type: none"> <li>■ Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)).</li> </ul>	This report is being published for consultation with the three statutory bodies (the Environment Agency, Historic England and Natural England)
<ul style="list-style-type: none"> <li>■ Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).</li> </ul>	Requirement will be met at a later stage in the IIA process
<ul style="list-style-type: none"> <li>■ Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).</li> </ul>	Not relevant as the Traveller Local Plan is not likely to have significant effects beyond the UK
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)	
<p><b>Provision of information on the decision:</b></p> <p>When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>■ the plan or programme as adopted;</li> <li>■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ the measures decided concerning monitoring.</li> </ul>	To be addressed after the Traveller Local Plan is adopted
<p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>	To be addressed after the Traveller Local Plan is adopted
<p><b>Quality assurance:</b> environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	This report has been produced in line with current guidance and good practice for SA/SEA and this table demonstrates where the requirements of the SEA Regulations have been met

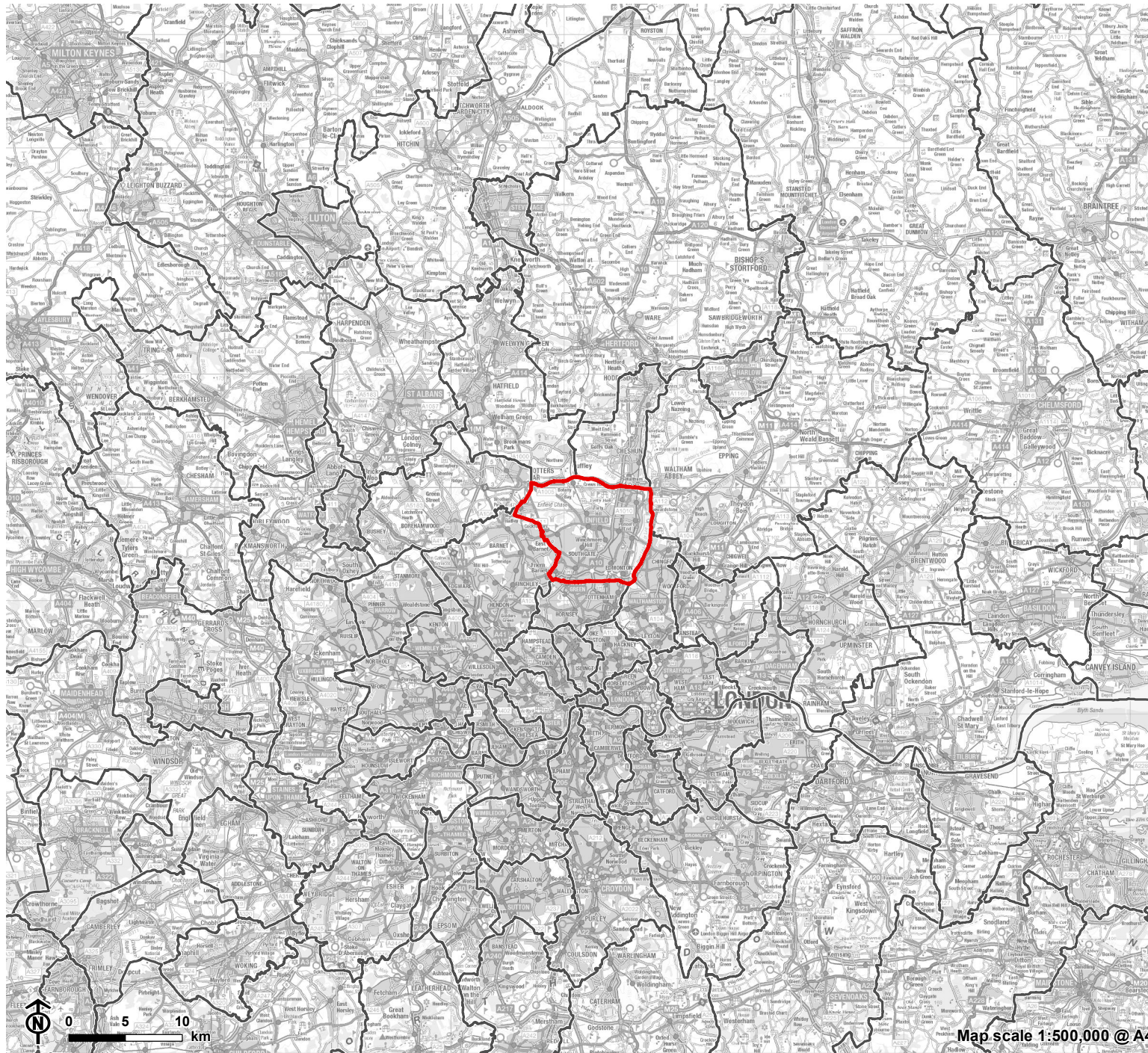
## Structure of the Scoping and Initial Options Appraisal Report



**1.36** This chapter describes the background to the preparation of the Traveller Local Plan, the requirement to undertake IIA and other assessment processes, in addition to the method. The remainder of this report is organised into the following chapters:

- **Chapter 2** describes the relationship between Enfield's Traveller Local Plan and other relevant plans and programmes and key policy objectives from those documents that the Traveller Local Plan could help to deliver.
- **Chapter 3** covers all relevant baseline information that relates to the Traveller Local Plan under the key topic areas affected, summarising the social, economic, and environmental characteristics of the Borough and considers how these issues are likely to evolve (in the absence of the Traveller Local Plan).
- **Chapter 4** presents the key sustainability issues facing the Borough that the Traveller Local Plan could help to address.
- **Chapter 5** presents the IIA framework for the Traveller Local Plan.
- **Chapter 6** presents the IIA findings for the Traveller Local Plan aims, objectives and policy directions, including reasonable alternatives.
- **Chapter 7** summarises the conclusions and next steps for the IIA process.



Figure 1.1: London Borough of Enfield



-  London Borough of Enfield boundary
-  Other local authority boundary

## Chapter 2

### Relevant plans and programmes

**2.1** Schedule 2 of the SEA Regulations requires:

- (a) “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes” and
- (e) “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

**2.2** An outline of the content and main objectives of the Traveller Local Plan is provided in **Chapter 1** and will be further described in subsequent IIA reports, as this emerges through the plan-making process.

**2.3** This chapter (**Chapter 2**) summarises the relationship between the Traveller Local Plan and other relevant plans and programmes. It also considers the relevant international, national and sub-national policy context which should be taken into consideration during preparation of the Plan and its IIA. The objectives of these plans and programmes have been taken into account when drafting the IIA framework in **Chapter 5**.

#### Relationship with other relevant plans or programmes

**2.4** The Traveller Local Plan, once published, will form part of the Development Plan for Enfield alongside the following documents:

- Enfield's new Local Plan (adoption anticipated in 2025);
- London Plan (2021);
- North London Waste Plan (2022); and
- any “Made” Neighbourhood Plans.

**2.5** Enfield's new Local Plan and the Traveller Local Plan will update and carry over all existing policies currently included in the following documents:

- Core Strategy (2010);
- Development Management Document (2014);
- North Circular Area Action Plan (2013);
- North East Enfield Area Action Plan (2016); and
- Edmonton Leaside Area Action Plan (2020).

**2.6** **Figure 2.1** shows the documents that comprise Enfield's existing Development Plan.

Figure 2.1: The current Enfield Development Plan



### Policy context

**2.7** This section sets out the policy context within which the Traveller Local Plan must operate in relation to the various sustainability themes covered by the IIA. It should be noted that the policy context within which the Traveller Local Plan and its IIA is being prepared is inherently uncertain given the following key factors:

- **UK economy** – The UK economy contracted by 0.2% in the third quarter of 2022 but flatlined over the final quarter of 2022, narrowly avoiding a technical recession. The Bank of England previously predicted that the UK would enter a recession in late 2022, however, the UK is now expected to avoid recession and begin to return to trend growth rates. Despite this, the economy is still underperforming compared to G7 peers and therefore caution should be taken in case of changes to the current recovery expectations. Should the UK's economy take a downturn, the potential implications for planning and development include Government spending cuts impacting on support available for services and facilities and new infrastructure.

- **Brexit** – Following the UK’s departure from the European Union on 31<sup>st</sup> January 2020, it entered a transition period which ended on 31<sup>st</sup> December 2020. From 1<sup>st</sup> January 2021, directly applicable EU law no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. Where EU law has been transposed into UK law and not repealed, the relevant UK legislation is still referred to in this report.
  - **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown. However, emerging evidence suggests that there has been an increase in remote working; reduced commuting and related congestion and air pollution; and increased prioritisation of walking and cycling over private transport in towns and cities.
  - **The Levelling Up and Regeneration Bill**<sup>9</sup> – Published on 11<sup>th</sup> May 2022, the Bill introduces a number of reforms to the planning system. It sets out the Government’s plans to drive local growth and empower local leaders to regenerate their areas. The Bill introduces a new Infrastructure Levy, new powers for councils to bring vacant properties back into use, a new approach to environmental assessments, and changes to neighbourhood planning including digitisation of the system.
- 2.8** It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including Enfield Council, that have declared a climate emergency.

### International

**2.9** At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the National Planning Policy Framework and Local Plans) should be in conformity with the relevant legislation.

### National

**2.10** There is an extensive range of national policies, plans and programmes that are of relevance to the Traveller Local Plan preparation and IIA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) of relevance to the Traveller Local Plan and IIA is provided below. In addition, the main sustainability objectives of other international and national plans and programmes which are of most relevance to the Traveller Local Plan and IIA have been reviewed and a summary of the implications for the Traveller Local Plan and IIA is provided below.

#### The National Planning Policy Framework and Planning Practice Guidance

**2.11** The NPPF<sup>10</sup> is the overarching planning framework which provides national planning policy and principles for the planning system in England. The Traveller Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

**2.12** The national PPG<sup>11</sup> sets out the Government’s planning policies for England and how these are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

**2.13** The overarching nature of the NPPF means that its implications for the IIA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its

<sup>9</sup> UK Parliament (2022). Levelling Up and Regeneration Bill. (see <https://www.gov.uk/government/collections/levelling-up-and-regeneration-bill>)

<sup>10</sup> MHCLG (2021). National Planning Policy Framework. (see <https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

<sup>11</sup> DLUHC and MHCLG (live). Planning Practice Guidance. (see <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>)



implications for the plan-making process and the IIA is provided in more detail below. The Government recently consulted on some changes to the NPPF in response to the Levelling-up and Regeneration Bill<sup>12</sup>.

**2.14** The NPPF should be read in conjunction with the existing National Model Design Code<sup>13</sup>, which provides detailed guidance on the production of design codes, guides and policies to promote successful design.

**2.15 Climate change adaption and mitigation, energy efficiency and waste minimisation** measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.” Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

**2.16** The Traveller Local Plan can identify areas where development would have lesser impacts in terms of its contribution to climate change (by limiting the need for site residents and users to travel, for example) or vulnerability to climate change. The IIA can consider the contribution the alternatives make in terms of climate change mitigation as well as climate change adaptation.

**2.17** In relation to **health and wellbeing**, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework.

**2.18** One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. It is identified in the document that “a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”.

**2.19** The delivery of sites is considered to support local communities by meeting accommodation needs and addressing shortages. The Traveller Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of pitches. The Traveller Local Plan can ensure that pitches are located in areas which can improve accessibility for residents and ensure that future development does not exacerbate existing inequalities. The IIA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy options that cumulatively improve the wellbeing of local communities.

**2.20** The NPPF sets out the approach Local Plans should take in relation to **biodiversity**, stating that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and support measurable for multi-functional areas and net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

**2.21** The Traveller Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of options which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of Biodiversity Net Gain. The IIA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

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<sup>12</sup> DLUHC (2022). Levelling-up and Regeneration Bill: reforms to national planning policy (see <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>)

<sup>13</sup> DLUHC and MHCLG (2021). National Model Design Code. (see <https://www.gov.uk/government/publications/national-model-design-code>)

- 2.22** In relation to **landscape**, the NPPF sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty.
- 2.23** The Traveller Local Plan should be supportive of an option to development which would protect the landscape character of the Borough. Where appropriate it should seek to protect the individual identities of areas within the Borough.
- 2.24** The NPPF states that in relation to the **historic environment** plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.
- 2.25** The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollution – including **water pollution and air quality**. Inappropriate development in areas at risk of **flooding** should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision infrastructure for water supply and wastewater.
- 2.26** The Traveller Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Traveller Local Plan can also ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The IIA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.
- 2.27** The NPPF states that planning system should protect and enhance **soils** in a manner commensurate with their statutory status or quality, while also encouraging the reuse of **previously developed land**.
- 2.28** The Traveller Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this the Traveller Local Plan should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The IIA process should inform the development of the Traveller Local Plan by helping to identify alternatives which would avoid the areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.
- 2.29** The Traveller Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The IIA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.
- 2.30** The Framework sets out that in terms of **economic growth** the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.
- 2.31** Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”.
- 2.32** The Traveller Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that local town centres and settlement services and facilities are maintained and enhanced is also important and will also provide support for local communities. The IIA process can support the development of the Traveller Local Plan to ensure that its policies are considerate of impacts on the economy in Enfield. The process can also be used to demonstrate that impacts on the viability of town centres in the area and surrounding areas have been considered.
- 2.33** The NPPF encourages local planning authorities to consider **transport** issues from the earliest stages of plan-making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport

infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The Framework also states that the planning system should actively manage growth patterns in support of these objectives.

**2.34** Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and IIA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Traveller Local Plan as supported by the IIA should seek to identify opportunities to maximise the potential for alternative modes of transport to private vehicles and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

### Other national plans and programmes

**2.35** Numerous other plans and programmes at a national level are of relevance to preparation of the Traveller Local Plan and the IIA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the IIA will consider. There will be some overlap between IIA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance for the IIA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the plans and programmes (including the NPPF) for the Traveller Local Plan and IIA.

#### Climate change adaption and mitigation, energy efficiency and waste minimisation

**2.36** The relevant international and national plans, policies and programmes under this topic are:

- Net Zero Strategy: Build Back Greener (2021);
- The Heat and Buildings Strategy (2021);
- The Energy Performance of Buildings Regulations (2021);
- The Energy White Paper: Powering Our Net Zero Future (2020);
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018);
- 25 Year Environment Plan (2018);
- HM Government, The Clean Growth Strategy (2017);
- UK Climate Change Risk Assessment (2017);
- United Nations Paris Climate Change Agreement (2015);
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014);
- Defra, Waste Management Plan for England (2013);
- The Energy Efficiency Strategy (2012);
- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2011);
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009); and
- The UK Renewable Energy Strategy (2009).

**Implications for the Traveller Local Plan and IIA:** The Traveller Local Plan should locate sites for Travellers in areas where sustainable transport patterns can be best achieved and encourage development that makes use of more sustainable construction methods and sources of energy. This will help minimise carbon emissions. The Traveller Local Plan should also contain policies to encourage appropriate use of Sustainable Drainage Systems (SuDS).

The IIA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual site options can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

## Health and well-being

**2.37** The relevant international and national PPPs under this topic are:

- National Design Guide (2021);
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021);
- The Charter for Social Housing Residents: Social Housing White Paper (2020);
- Using the Planning System to Promote Healthy Weight Environments (2020), Addendum (2021);
- Planning for the Future White Paper (2020);
- Public Health England, PHE Strategy 2020-25;
- Homes England Strategic Plan 2018 to 2023 (2018);
- Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015);
- HM Government, Laying the foundations: housing strategy for England (2011);
- Fair Society, Healthy Lives (2011);
- Healthy Lives, Healthy People: Our strategy for public health in England (2010);
- The Health of Gypsies and Travellers in the UK (2008);
- The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002); and
- United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998).

**Implications for the Traveller Local Plan and IIA:** The Traveller Local Plan, in conjunction with the Infrastructure Delivery Plan, needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the Traveller community has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the population. This should include healthcare, education and open space. Sites for accommodation should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies in the Traveller Local Plan can also help to facilitate the supply of healthy local food. The provision of an appropriate level of pitches and plots over the plan period will help address issues of disparity in terms of access to decent homes in the plan area for Travellers. The provision should be considerate of local needs with regards to size, tenure and type.

Policy options considered for the Traveller Local Plan can be tested through the IIA in relation to the contributions they make towards these aims. The IIA should also appraise the contribution individual site options can make to health and wellbeing. This should be considered through the site's ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. It may be necessary to consider the capacity of existing facilities when considering individual site options. Consideration should also be given to the capacity of sites to deliver new homes, including affordable homes.

## Environment (biodiversity/geodiversity, landscape and soils)

**2.38** The relevant international and national PPPs under this topic are:

- The Environment Act 2021;
- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018);

- The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579);
- United Nations Declaration on Forests (New York Declaration) (2014);
- Defra, Biodiversity offsetting in England Green Paper (2013);
- Defra, Biodiversity 2020: A Strategy for England's wildlife and ecosystem services (2011);
- Defra, Safeguarding our Soils – A Strategy for England (2009);
- European Landscape Convention (2002);
- International Convention on Biological Diversity (1992);
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979); and.
- International Convention on Wetlands (Ramsar Convention) (1976).

**Implications for the Traveller Local Plan and IIA:** The Traveller Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of wider ecological network. The Plan also presents opportunities to promote the achievement of net gains in biodiversity. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by allocating sites in to less sensitive locations. The allocation of new sites for pitches and updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be the role of the IIA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. Site options should be considered in these terms also, making use of the findings of the HRA and landscape character assessment work where appropriate.

### Historic environment

**2.39** The relevant international and national PPPs under this topic are:

- The Heritage Alliance, Heritage 2020;
- Historic England, Corporate Plan 2018-2021;
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016);
- Valletta Treaty, formerly the European Convention on the Protection of Archaeological Heritage (1992);
- European Convention for the Protection of the Architectural Heritage of Europe (1985); and
- The United Nations (UNESCO) World Heritage Convention (1972).

**Implications for the Traveller Local Plan and IIA:** The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Traveller Local Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). Policies should be included to address these issues and site options should be considered with regard to the potential for related issues. The IIA should appraise both policy and site options in terms of the potential for effects on the historic environment. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment.

## Water and air

**2.40** There are no specific international policy agreements under this topic relevant to the preparation of the Enfield Traveller Local Plan and the IIA.

**2.41** The relevant national PPPs under this topic are:

- The Waste (Circular Economy) (Amendment) Regulations (2020);
- The Water Supply (Water Quality) Regulations;
- Defra, Clean Air Strategy (2019);
- The Road to Zero (2018);
- Our Waste, Our Resources: A Strategy for England (2018);
- The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017);
- Environment Agency, Managing Water Abstraction (2016);
- Defra, Water White Paper (2012); and
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007).

**Implications for the Traveller Local Plan and IIA:** The Traveller Local Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water and air pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for pitches should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the period, the Traveller Local Plan should also factor in the contribution specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution policy options can make to achieving these aims can be tested through the IIA. Individual site options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMAs).

## Economic growth

**2.42** There are no specific international or national economic policy agreements relevant to the preparation of the Enfield Traveller Local Plan and the IIA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade with other countries.

**Implications for the Traveller Local Plan and IIA:** Sites for pitches and plots should be located close to employment areas, to enable local people to be able to access the new employment opportunities.

The IIA can test individual site and policy options in relation to the contribution they can make to achieving these aims.

## Transport

**2.43** The relevant international and national PPPs under this topic are:

- Decarbonising Transport: A Better, Greener Britain (2021);
- The Road to Zero (2018);
- Door to Door: A strategy for improving sustainable transport integration (2013).

**Implications for the Traveller Local Plan and IIA:** The IIA should be used to test policy and site options in terms of the contribution they can make to making transport choices more sustainable in the Borough. As well as testing site options in

terms of limiting the need to travel in Enfield, policy options should be tested with regard the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

## Sub-national policy context

**2.44** Below the national level there are further plans and programmes which are of relevance to the Traveller Local Plan and IIA process, namely the London Plan.

### The London Plan

**2.45** The London Plan 2021 is the statutory Spatial Development Strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan is prepared by the Mayor of London in accordance with the Greater London Authority Act 1999 (as amended) and associated regulations. The London Plan is legally part of each of London's local planning authorities' Development Plan. As a result, planning applications, Development Plan Documents and Neighbourhood Plans must be in 'general conformity' with the London Plan.

**2.46** According to the Gypsy and Traveller Accommodation Needs Assessment (2020), LBE requires 23 additional pitches.

**2.47 Policy SI7: Reducing waste and supporting the circular economy** in the London Plan seeks to promote a more circular economy that improves resource efficiency, as well as encouraging waste minimisation and waste prevention. By 2026, there should be zero biodegradable or recyclable waste to landfill and all London authorities must meet or exceed the municipal waste recycling target of 65% by 2030. With regard to construction and demolition waste, 95% must be reused, recycled, or recovered. Enfield's household, commercial and industrial waste forecast for 2021 is 305,000 tonnes and is projected to increase to 327,000 tonnes by 2041.

**2.48 Policy SI2: Minimising greenhouse gas emissions** states that there must be a minimum on-site reduction of emissions by at least 35% beyond Building Regulations. Residential development should achieve 10%, and non-residential should achieve 15% through efficiency measures.

**2.49 Policy H14: Gypsy and Traveller accommodation** requires all London Boroughs to meet the identified need for permanent Gypsy and Traveller pitches and to include ten year pitch targets in their Development Plans. This target must be developed through undertaking a needs and assessment process and report, including auditing existing authority provided Gypsy and Traveller sites and pitches.

**2.50 Policy G5: Urban greening** outlines that Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial developments (excluding B2 and B8 uses). Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity, and other environmental factors, delivering more than 50% green cover across London, will be important to help London become a National Park City.

**2.51 Policy G6: Biodiversity and access to nature** states that Sites of Importance for Nature Conservation (SINCs) should be protected. When developing Development Plans, Boroughs should use up-to-date information about the natural environment and the relevant procedures to identify SINCs, ecological corridors and coherent ecological networks.

## Key plans, policies and programmes for Enfield

**2.52** The Core Strategy, Development Management Document and Area Action Plans collectively form Enfield's Local Plan.

**2.53** The Traveller Local Plan is anticipated to be adopted in 2026, following adoption of Enfield's new Local Plan in 2025, which contains a policy acknowledging the need and commitment to produce the Traveller Local Plan. These two documents will update and carry over all exiting policies contained in the Core Strategy, Development Management Document and the three Area Action Plans.

**2.54** The new Local Plan will cover the period to 2039 and provide a single planning policy document for the Borough and a new vision for how Enfield will spatially develop to 2039 and beyond. The new Local Plan will also include site allocations, identifying key development sites that can make a substantial contribution towards the Borough's growth targets. It will provide

site specific guidance and requirements for individual sites to ensure development comes forward in a manner that ensures each site fulfils its potential and properly responds to its context. The Traveller Local Plan as described at the start of this report will specifically address the accommodation needs of Travellers. The Plan will include site allocations and criteria-based policies aimed at meeting the assessed need for pitches within Enfield Borough.

**2.55** These two documents, alongside the London Plan (2021), North London Waste Plan (2022) and any "Made" Neighbourhood Plans will form part of the new Development Plan for Enfield. The documents will be supported through the use of Supplementary Planning Documents where relevant.

**2.56** The policy direction as described above is, however, subject to change until the new Local Plan is adopted.

## Gypsy and Traveller accommodation needs assessments in adjoining local authorities

**2.57** Development in the LBE will not be delivered in isolation from those areas around it. The following Gypsy and Traveller accommodation needs assessments have been prepared in each of the local authority areas neighbouring LBE. These assessments reflect the current position of the neighbouring authorities, and could be acknowledged through future Duty to Cooperate conversations.

### Barnet

- Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2021)<sup>14</sup>
- West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2018)<sup>15</sup>

### Haringey

- London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (2008)<sup>16</sup>

### Waltham Forest

- London Borough of Waltham Forest Gypsy and Traveller Accommodation Assessment (2020)<sup>17</sup>

### Epping Forest

- Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Summary 2016-2023 (2018)<sup>18</sup>
- Essex, Southend-on-Sea and Thurrock Gypsy and Traveller Accommodation Assessment Joint Methodology (2018)<sup>19</sup>
- Epping Forest District Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017)<sup>20</sup>
- Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association (2014)<sup>21</sup>

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<sup>14</sup> Barnet Council (2021). Update on Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (2018). (see [https://www.barnet.gov.uk/sites/default/files/update\\_report\\_gtaa.pdf](https://www.barnet.gov.uk/sites/default/files/update_report_gtaa.pdf))

<sup>15</sup> Opinion Research Services (2018). West London Alliance Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. (see [https://www.london.gov.uk/sites/default/files/rep-23-001a\\_london\\_borough\\_of\\_brent\\_appendix\\_to\\_hearing\\_statement.pdf](https://www.london.gov.uk/sites/default/files/rep-23-001a_london_borough_of_brent_appendix_to_hearing_statement.pdf))

<sup>16</sup> Fordham Research (2008). London Boroughs' Gypsy and Traveller Accommodation Needs Assessment. (see [https://www.haringey.gov.uk/sites/haringeygovuk/files/london\\_boroughs\\_gtana.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/london_boroughs_gtana.pdf))

<sup>17</sup> Opinion Research Services (2020). London Borough of Waltham Forest Gypsy and Traveller Accommodation Assessment. (see <https://www.walthamforest.gov.uk/sites/default/files/2021-11/Gypsy%20and%20Traveller%20Accommodation%20Assessment%20Final%20Report%20%281%29.pdf>)

<sup>18</sup> Opinion Research Services (2018). Essex, Southend-on-Sea and Thurrock Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Summary 2016-2023. (see <https://www.efdclocalplan.org/wp-content/uploads/2018/03/EB401A1.pdf>)

<sup>19</sup> Opinion Research Services (2018). Essex, Southend-on-Sea and Thurrock Gypsy and Traveller Accommodation Assessment Joint Methodology. (see <https://www.efdclocalplan.org/wp-content/uploads/2018/03/EB401B1.pdf>)

<sup>20</sup> Opinion Research Services (2017). Epping Forest District Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment: Need Summary Report. (see <https://www.efdclocalplan.org/wp-content/uploads/2018/03/EB402E2.pdf>)

<sup>21</sup> Opinion Research Services (2014). Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association. (see <https://www.efdclocalplan.org/wp-content/uploads/2018/02/EB403-Essex-GypsyTraveller-Accom-Asmt-on-for-EPOA-2014.pdf>)



### Broxbourne

- Borough of Broxbourne Gypsy and Traveller Accommodation Assessment (2017)<sup>22</sup>
- Gypsy and Traveller Household Formation and Growth Rates (2015)<sup>23</sup>
- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment: Technical Report (2015)<sup>24</sup>
- Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire (2007)<sup>25</sup>
- Northern and Eastern Hertfordshire: Gypsy and Traveller Accommodation Assessment (2006)<sup>26</sup>

### Welwyn Hatfield

- Gypsy and Traveller and Travelling Showpeople – Accommodation Needs Assessment Update (2018)<sup>27</sup>
- Gypsy and Traveller and Travelling Showpeople: Accommodation Needs Assessment Report (2011)<sup>28</sup>

### Hertsmere

- Hertsmere Brough Council Gypsy and Traveller Accommodation Assessment (2017)<sup>29</sup>

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<sup>22</sup> Opinion Research Services (2017). Gypsy and Traveller Accommodation Assessment. (see <https://www.broxbourne.gov.uk/downloads/file/824/qt1-gypsy-and-traveller-accommodation-assessment-2017>)

<sup>23</sup> Opinion Research Services (2015). Gypsy and Traveller Household Formation and Growth Rates. (see <https://www.broxbourne.gov.uk/downloads/file/823/qt2-gypsy-and-traveller-household-formation-tech-note-2015>)

<sup>24</sup> Salford Housing and Urban Studies Unit and Cambridgeshire Research Group (2014). Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment: Technical Report. (see <https://www.broxbourne.gov.uk/downloads/file/825/gypsy-and-traveller-needs-assessment-october-2014->)

<sup>25</sup> Scott Wilson (2007). Accommodation Needs of Gypsies and Travellers in Northern and Eastern Hertfordshire. (see <https://www.broxbourne.gov.uk/downloads/file/886/pp-sw-gypsyandtravelleraccommodationcomplete-2007>)

<sup>26</sup> Opinion Research Studies (2006). Northern and Eastern Hertfordshire: Gypsy and Traveller Accommodation Assessment. (see <https://www.broxbourne.gov.uk/downloads/file/877/pp-ors-gypsy-gtaa-report>)

<sup>27</sup> Welwyn Hatfield Borough Council (2018). Gypsy and Traveller and Travelling Showpeople – Accommodation Needs Assessment 2016. (see [https://archive.welhat.gov.uk/media/13613/EX76-WHBC-GTAA-2016-Updated-March-2018/pdf/EX76\\_WHBC\\_GTAA\\_2016\\_Updated\\_March\\_2018.pdf?m=636622467670100000](https://archive.welhat.gov.uk/media/13613/EX76-WHBC-GTAA-2016-Updated-March-2018/pdf/EX76_WHBC_GTAA_2016_Updated_March_2018.pdf?m=636622467670100000))

<sup>28</sup> Welwyn Hatfield Borough Council (2011). Gypsy and Traveller and Travelling Showpeople: Accommodation Needs Assessment Report 2011. (see [https://archive.welhat.gov.uk/media/11319/Gypsies-and-Travellers-and-Travelling-Showpeople-Accommodation-Needs-Assessment-2012/pdf/Final\\_Version\\_-\\_Gypsies\\_and\\_Travellers\\_and\\_Travelling\\_Showpeople\\_Accommodation\\_Needs\\_Assessment\\_v1\\_.pdf?m=636028858071670000](https://archive.welhat.gov.uk/media/11319/Gypsies-and-Travellers-and-Travelling-Showpeople-Accommodation-Needs-Assessment-2012/pdf/Final_Version_-_Gypsies_and_Travellers_and_Travelling_Showpeople_Accommodation_Needs_Assessment_v1_.pdf?m=636028858071670000))

<sup>29</sup> Opinion Research Services (2017). Hertsmere Borough Council Gypsy and Traveller Accommodation Assessment. (see <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Gypsy--Traveller-Information/2017-09-28-Hertsmere-GTAA-Final-Report.pdf>)

## Chapter 3

### Baseline information

**3.1** Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.’

‘(3) The environmental characteristics of areas likely to be significantly affected.’”

**3.2** Schedule 2(6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these. As an integrated SA/SEA with HIA, EqlA and CSIA is being carried out, baseline information relating to other ‘sustainability’ topics has also been included, for example, information about accommodation, social inclusiveness, transport, energy, waste, and economic growth.

**3.3** Information on existing environmental, social, and economic conditions in the Plan area provides the baseline against which the Plan’s effects can be assessed in the IIA and monitored during the Plan’s implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Traveller Local Plan to understand the likely future sustainability conditions in the absence of the Traveller Local Plan. This, in turn, can inform a cumulative effects assessment.

**3.4** An IIA is being undertaken of Enfield’s emerging Local Plan and so the IIA of the Traveller Local Plan will draw on and provide an update to the baseline information for the Borough presented in the May 2020 IIA Scoping Report produced by AECOM and the June 2021 IIA produced by LUC, with specific reference to Travellers where relevant.

#### Air quality

**3.5** Air pollution is the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. In London, the key driver of air pollution is transport. As such, the London Environment Strategy, published in 2018, aims to transform London’s air quality from “illegally poor” to “the best air quality of any major world city” by 2050.<sup>30</sup>

**3.6** Borough-wide carbon emissions increased by 2% over the 2017 Climate Action Plan baseline year and 6% over 2018. However, in accordance with national and global targets, the Council has met the previous carbon emission reduction target of 40% in 2020, as reductions of 45% of Borough emissions were made between 2009 and 2018.<sup>31</sup>

**3.7** The entirety of the London Borough of Enfield has been subject to an Air Quality Management Area since 2001 owing to high levels of nitrogen dioxide and PM<sub>10</sub> (Particulate Matter less than 10 micron in diameter) exceeding the standards set by the London Air Quality Management Plan, in the Borough’s busy roadside locations.<sup>32</sup>

**3.8** There are four monitoring sites for air pollution across the Borough. The measured annual concentrations at the monitoring sites are below the health-based air quality limit value for nitrogen dioxide, which is set at 40ug/m3. These

<sup>30</sup> Mayor of London (2018). London Environment Strategy. (see [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf))

<sup>31</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022 (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>32</sup> Enfield Council (2022). Enfield Air Quality Action Plan 2022-2027. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0017/34271/Enfield-Air-Quality-Action-Plan-2022-Environment.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0017/34271/Enfield-Air-Quality-Action-Plan-2022-Environment.pdf))

concentrations are lower than in previous years and the monitored levels will have been impacted by the lockdowns in 2021 and 2022.<sup>33</sup>

**3.9** There is currently a total of 96 Public Highway and Public Car Park electric vehicle charging points installed within Enfield, as of February 2023<sup>34</sup>. In the Council's Climate Action Plan, there is a commitment to provide an additional 250 charging sockets for electric vehicles on public highways and public car parks by 2025.<sup>35</sup>

**3.10** There is growing concern from local stakeholders about the impact of air pollution on the Epping Forest Special Area of Conservation (SAC) from traffic movements along the A406. With key development sites such as Meridian water with LBE's boundary, the Borough must carefully consider the impacts any development brings with regards to increased traffic on road infrastructure and the knock-on effect this may have on the SAC.

#### Likely future changes without the Traveller Local Plan

**3.11** The entire Borough is designated an Air Quality Management Area and although there have been some decreases in nitrogen dioxide levels, these statistics were impacted by the COVID-19 lockdowns in 2021 and 2022. As the country recovers from the pandemic and people travel into work more, there is likely to be an increase in nitrogen dioxide and other pollutants associated with transport. However, this may in part be mitigated by expansion of the Ultra Low Emission Zone, the Government's commitment to ban all new petrol and diesel cars from 2030 and the subsequent increase in electric vehicles, in addition to an increased uptake in walking and cycling. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres. Without the Traveller Local Plan, air quality is likely to continue to decline as a result of population growth and car dependency but possibly more slowly than historic trends suggest, as a result of the factors listed above. Without the Traveller Local Plan, sites for Travellers may be located in inaccessible locations which increase reliance on private vehicles, particularly if there is a lack of access to public transport, and walking and cycling routes. This would contribute towards poor air quality.

### Biodiversity

**3.12** The Enfield Biodiversity Action Plan<sup>36</sup> records the Borough as having an approximate green coverage of 38%, with 25 designated Sites of Importance for Nature Conservation (SINCS) across the Borough. Despite this, the Mayor of London classifies 22% of the Borough's population as having a lack of access to nature.

**3.13** Enfield boasts a wealth of biodiversity, having important populations of nationally and internationally scarce plant and animal species. It also has several important habitats including important grassland habitats and more than three hundred hectares of woodland<sup>37</sup>. Although there are no Special Area of Conservation (SAC), the Epping Forest SAC sits within 0.5km of Enfield's border to the east of the Borough. The Lee Valley Ramsar site sits within 0.5km north of the Borough, cradling the border between Essex County Council and Hertfordshire County Council. The Lee Valley is also designated as a Special Protection Area (SPA).

**3.14** The Borough contains 41 Sites of Importance for Nature Conservation (SINCS), which are given protection through planning policy. This includes 7 metropolitan sites, 19 borough sites and 15 local sites. According to the latest Annual Monitoring Report, there were no identified losses or changes to the biodiversity status of the 41 SINCS in 2021/22.<sup>38</sup>

**3.15** The King George V and William Girling Reservoirs are designated as a Site of Special Scientific Interest (SSSI) for their nationally important populations of wildfowl and wetland birds.<sup>39</sup>

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<sup>33</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>34</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022 (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>35</sup> Enfield Council (2021). Electric vehicle charging. (see <https://new.enfield.gov.uk/services/roads-and-transport/electric-vehicle-charging/>)

<sup>36</sup> Enfield Council (2011). Nature for People; A Biodiversity Action Plan for Enfield. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/5392/planning-application-information-biodiversity-action-plan.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/5392/planning-application-information-biodiversity-action-plan.pdf))

<sup>37</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>38</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>39</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

**3.16** There are also a number of SSSIs in close proximity to the Borough:

- Walthamstow Reservoir SSSI – within 1km;
- Epping Forest SSSI – within 0.5km;
- Cornmill Stream and Old River Lea SSSI – within 1km;
- Waltham Abbey SSSI – within 1km; and
- Northaw Great Wood SSSI – within 2km.

**3.17** There are no National Nature Reserves within or in close proximity to LBE. However, there are pockets of Ancient Woodland sites in the north east of the Borough in the Enfield Chase area:

- Whitewebbs Wood;
- Little Beachhill Wood;
- Vault Hill Hood;
- Rough Lot & Moat Wood; and
- Oak Wood.

**3.18** There have been several network-led nature conservation efforts set out for the Borough. The Enfield Chase Woodland Restoration Project is being delivered in partnership with Thames21 and funded by the Mayor of London, Enfield Council and the Forestry Commission. The target of planting 100,000 trees between November 2020 and March 2022, has been achieved resulting in the creation of 60 hectares of woodland.<sup>40</sup>

#### Likely future changes without the Traveller Local Plan

**3.19** The London Borough of Enfield contains a number of designated and non-designated biodiversity assets, which are experiencing recreational use pressures and pollution, in addition to loss and fragmentation exacerbated by climate change. Recreational use pressures are a problem, despite the fact less than one quarter of the Borough's population lacks access to nature. Without the Traveller Local Plan, pressures on the natural environment are likely to continue, although the Environment Act 2021 will help address habitat loss and fragmentation through biodiversity net gain, mandatory from November 2023. In terms of pollution affecting biodiversity assets, particularly the Epping Forest SAC, this may to an extent be mitigated through expansion of the Ultra Low Emission Zone and a shift from petrol and diesel cars to electric vehicles. Without the Traveller Local Plan, sites for Travellers may be located in sensitive locations and so exacerbate the aforementioned problems.

### Climate change adaptation

**3.20** Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Enfield across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change: warmer, drier summers and wetter winters with more severe weather events all year, higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help people, species and habitats adapt.

**3.21** There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than the 1961–1990 average. All the top ten warmest years for the UK in the series from 1884 have occurred this century.<sup>41</sup>

**3.22** Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990.<sup>42</sup>

<sup>40</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>41</sup> Met Office (2022). UKCP18 Climate Change. (see <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/data/index>)

<sup>42</sup> International Journal of Climatology (2022). State of the UK Climate 2021. (see <https://rmet.s.onlinelibrary.wiley.com/doi/10.1002/JOC.7787>)

**3.23** The Intergovernmental Panel on Climate Change (IPCC) special report on global warming outlines that, under emissions in line with current pledges under the Paris Agreement, global warming is expected to surpass 1.5°C, even if these pledges are supplemented with very challenging increases in the scale and ambition of mitigation after 2030. This increased action would need to achieve net zero CO<sub>2</sub> emissions in less than 15 years.<sup>43</sup> It has since been suggested in the Environmental Improvement Plan published in January 2023 that "whilst we aim to limit global warming to 1.5°C, evidence shows that we must be prepared for warming up to 4°C", emphasising the importance of climate change adaptation measures and recognition in local policy.<sup>44</sup>

**3.24** The UK Climate Projections (UKCP18) predicts that by 2070, under a high emission scenario, average winter precipitation is projected to increase, whilst average summer rainfall is projected to decrease. Although summer rainfall is projected to decrease, there will be an increased frequency of short-lived high intensity showers.<sup>45</sup>

**3.25** The Borough will become more vulnerable to fluvial flooding, water supply deficiencies and sea level rises, as the local climate continues to change. The most significant sources of flooding in Enfield are main rivers and surface water.<sup>46</sup>

**3.26** There are three main river valleys that flow across Enfield towards the River Lee on the eastern side of the Borough – Turkey Brook, Salmons Brook and Pymmes Brook. These rivers all rise in or near the higher ground in the western half of Enfield. The majority of the runoff that contributes to these rivers is generated within Enfield. The River Lee is the main source of potential flooding from outside the Borough.<sup>47</sup>

**3.27** The number of properties at risk of flooding in Enfield is high compared to most other local authorities. This is mainly due to the geography and layout of Enfield – most of the properties at risk of flooding are in the Lee valley area, which was historically an area of marshland. Consequently, a wide range of flood defence systems are required to manage flooding and ensure that Enfield's residents and businesses are not faced with unacceptable risks or disruption. These defences include all aspects of the drainage network from simple road gullies to large channelised rivers, floodwalls and flood storage areas.<sup>48</sup>

**3.28** In 2018, Enfield Council developed a Sustainable Drainage Design and Evaluation Guide<sup>49</sup> to make sure new developments comply with Borough policies. Sustainable Drainage Systems (SuDS) play an important role in increasing the resilience of the drainage network and improving water quality of receiving watercourses. There is a wide range of existing SuDS techniques in operation across Enfield. Some of these are relatively old features such as highway drainage ditches and ponds, more recently rain gardens and permeable paving have been installed as part of highway works and other projects. The guide promotes the idea of integrating SuDS into development to address issues with conventional drainage.<sup>50</sup>

#### Likely future changes without the Traveller Local Plan

**3.29** The effects of climate change in the Borough are likely to result in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. Climate change is likely to have ongoing effects regardless of the Traveller Local Plan, considering the scale of the challenge it poses. Without the Traveller Local Plan, the occurrence of extreme weather events is expected to increase. However, documents like the Sustainable Drainage Design and Evaluation Guide will help promote flood risk mitigation, in addition to policies in the adopted Local Plan. These include Core Policies 20: Sustainable Energy Use and Energy Infrastructure, Core Policy 29: Flood Management Infrastructure, DM 8.1-8.5 within the Development Management Document, and London Plan Policies SI 4: Managing Heat Risk and SI 12: Flood Risk Management.

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<sup>43</sup> IPCC (2019) IPCC Special Report Global Warming of 1.5oC. (see <https://www.ipcc.ch/sr15/>)

<sup>44</sup> Department for Environment, Food & Rural Affairs (2023). Environmental Improvement Plan 2023. (see <https://www.gov.uk/government/publications/environmental-improvement-plan>)

<sup>45</sup> Department for Environment, Food and Rural Affairs, Department for Business, Energy and Industrial Strategy, Met Office and Environment Agency (n.d.) UK Climate Projections. (see <https://www.metoffice.gov.uk/pub/data/weather/uk/ukcp18/science-reports/ukcp-infographic-headline-findings.pdf>)

<sup>46</sup> Enfield Council (2016). Local Flood Risk Management Strategy (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf))

<sup>47</sup> Enfield Council (2016). Local Flood Risk Management Strategy (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf))

<sup>48</sup> Enfield Council (2016). Local Flood Risk Management Strategy (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0021/5547/flooding-information-local-flood-risk-management-strategy-2016.pdf))

<sup>49</sup> Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

<sup>50</sup> Enfield Council (2018). Sustainable Drainage Design and Evaluation Guide (see <http://online.flipbuilder.com/mccloy.consulting/ftvi/mobile/index.html>)

## Climate change mitigation

**3.30** Carbon dioxide (CO<sub>2</sub>) is the main greenhouse gas, accounting for about 80% of the UK greenhouse gas emissions. Emissions are produced when fossil fuels such as coal or gas are burnt or processed. In recent years, increasing emphasis has been placed on the role of regional bodies and local government in contributing to energy efficiency improvements, and hence reductions in carbon dioxide emissions. In line with the wider UK, London has seen a decrease in CO<sub>2</sub> emissions in recent years. One of the main drivers for reduced levels of emissions has been a decrease in the use of coal for electricity generation, accounting for a decrease in emissions for domestic electricity.

**3.31** The Government regularly publishes local authority and regional carbon dioxide emissions national statistics.<sup>51</sup> The statistics are largely consistent with the UK national Greenhouse Gas Inventory and with the Devolved Administration Greenhouse Gas Inventories. In Enfield, carbon dioxide emissions have fallen from 5.6 tonnes (t) per capita to 3.3t per capita (equivalent to a 52% reduction) as demonstrated in **Table 3.1**.

**Table 3.1: CO<sub>2</sub> emissions estimates in Enfield 2005 - 2019<sup>52</sup>**

Year	Total emissions (kt)	Per capita emissions (t)
2005	1,601.8	5.6
2006	1,739.3	6.1
2007	1,734.0	5.9
2008	1,567.8	5.3
2009	1,426.5	4.7
2010	1,508.1	4.9
2011	1,358.1	4.3
2012	1,463.2	4.6
2013	1,438.7	4.5
2014	1,294.4	4.0
2015	1,264.3	3.8
2016	1,207.6	3.6
2017	1,160.2	3.5
2018	1,151.6	3.4
2019	1,112.1	3.3

**3.32** The Department for Business, Energy & Industrial Strategy produced the following consumption figures for Enfield in 2020.<sup>53</sup>

<sup>51</sup> Office for National Statistics (2021). 2005 to 2019 UK local and regional CO<sub>2</sub> emissions – data tables. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/996057/2005-19\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx))

<sup>52</sup> Office for National Statistics (2021). 2005 to 2019 UK local and regional CO<sub>2</sub> emissions – data tables. (see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/996057/2005-19\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx))

<sup>53</sup> Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see

- **Coal** – a total of 0.1 kilo tonnes of oil equivalent (ktoe) predominantly through domestic use;
- **Manufactured Fuels** – a total of 0.3ktoe predominantly through domestic use;
- **Petroleum** – a total of 136ktoe predominantly through road transport;
- **Gas** – a total of 189.8ktoe predominantly through domestic use;
- **Electricity** – a total of 84.0ktoe predominantly through domestic use; and,
- **Bioenergy and wastes** – a total of 8.0ktoe predominantly through road transport.

**3.33** Between 2005 and 2020 the total reported energy consumption for the Borough fell from 338.7 to 291.3ktoe. The changes in consumption by energy type are shown in **Table 3.2**.

**Table 3.2: Energy consumption in Enfield by type 2005-2020<sup>54</sup>**

Energy type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2020)
Coal	0.2	0.1
Manufactured fuels	0.3	0.3
Petroleum	146.7	136
Gas	236.7	189.8
Electricity	98.4	84.0
Bioenergy and wastes	0.5	8.0
Total	482.8	418.2

**3.34** The use of private vehicles can also generate CO<sub>2</sub> emissions, although just under one third of Enfield residents do not own a vehicle, which is significantly below the London average (see 'Transport' section).

**3.35** Enfield Council declared a climate change emergency in summer 2019. Their Climate Action Plan 2020<sup>55</sup>, overseen by a dedicated Climate Change Taskforce subsequently explains how the Borough will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. It sets out Enfield's current carbon emissions and the action they will need to take to achieve their net zero targets. The Council have committed to reviewing this Action Plan on an annual basis, with the latest Climate Action Plan Progress Report being published in 2022. Currently, the 2022/2023 report is being prepared.<sup>56</sup>

**3.36** The Tyndall Centre has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Enfield.<sup>57</sup>

- Stay within a maximum cumulative carbon dioxide emissions budget of 7.1 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub> emission levels, Enfield would use this entire budget within seven years from 2020.
- Initiate an immediate programme of CO<sub>2</sub> mitigation to deliver cuts in emissions averaging a minimum of -13.2% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action and could be part of a wider collaboration with other local authorities.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1106843/subnational\\_total\\_final\\_energy\\_consumption\\_2020.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106843/subnational_total_final_energy_consumption_2020.xlsx)

<sup>54</sup> Department for Business, Energy and Industrial Strategy (2022). Total final energy consumption at regional and local authority level: 2005 to 2020 (see

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1106843/subnational\\_total\\_final\\_energy\\_consumption\\_2020.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1106843/subnational_total_final_energy_consumption_2020.xlsx))

<sup>55</sup> Enfield Council (2020). Enfield Climate Action Plan. (see <https://www.enfield.gov.uk/services/environment/climate-action>)

<sup>56</sup> Enfield Council (2023). Climate Action (see <https://www.enfield.gov.uk/services/environment/climate-action>)

<sup>57</sup> Tyndall Centre (2023). Setting Climate Commitments for Enfield (see <https://carbonbudget.manchester.ac.uk/reports/E09000010/>)

- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO<sub>2</sub> reduction pathway that stays within the recommended maximum carbon budget of 7.1 MtCO<sub>2</sub>. At 2042, 5% of the budget remains. This represents very low levels of residual CO<sub>2</sub> emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO<sub>2</sub> emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO<sub>2</sub> emissions are also adopted.

### Likely future changes without the Traveller Local Plan

**3.37** Despite efforts to reduce greenhouse gas emissions, the effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. Climate change will therefore continue to prevail. Without the Traveller Local Plan, sites for Travellers may be located in inaccessible locations that increase reliance on private vehicles, although expansion of the Ultra Low Emission Zone and the shift to electric vehicles may help reduce emissions associated with private vehicles.

## Communities

**3.38** Mid-year population data for 2021 estimates Enfield's population as 329,600, a decrease from 2019 levels which stood at approximately 333,794. Comparatively, the population for London and England have both increased on 2019 levels, standing at an estimated 8,796,600 and 65,121,700 respectively<sup>58</sup>. Despite this, the population of Enfield has increased over the course of the last 10 years. The population of Enfield is predominantly within the "working age bracket" of 16-64, at an estimated 64.3%. This is lower than the London average of 68.8% but 1.4% above the national average.

**3.39** Based on 2019 Enfield Ethnicity estimates, residents from White British backgrounds make up 35.32% of Enfield's inhabitants with White Irish at 2.18% and other White groups at 25.13%. Other Ethnic Groups represent 5.25% of the population, Mixed Groups at 5.48%, Asian Groups at 10.97% and Black groups at 17.89%. The BAME population in Enfield is projected to increase significantly by a combined average of 15.49% over the next 10 years by 2029, this is relatively higher than the London average increase of 14.27%. This will make Enfield the 10th most diverse Borough in 2029 measured by population size of BAME residents<sup>59</sup>.

**3.40** Enfield's population is highly diverse and includes a small but significant number of Gypsy and Traveller communities. According to the 2021 Census, there are 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.

**3.41** Pupils in Enfield schools speak over 178 languages and dialects. The top five non-English languages spoken by Enfield school pupils in 2020 were Turkish, Somali, Polish, Albanian and Bengali. In Enfield, data on deaths between 15<sup>th</sup> March and 5<sup>th</sup> May 2020 shows that COVID-19 deaths disproportionately affected the following ethnic groups: Turkish, Somalian, African, Caribbean, East Asian and Bangladeshi, and among people who spoke Turkish, Arabic, Akan and Bengali.<sup>60</sup>

**3.42** Enfield is ranked as the 59<sup>th</sup> most deprived local authority areas in England and the 12<sup>th</sup> most deprived in London according to the 2019 English Indices of Deprivation<sup>61</sup>. The 10% most deprived areas in Enfield are the most diverse areas with the largest population of ethnic minorities.<sup>62</sup>

**3.43** In 2019, 69.7% of pupils in Enfield had achieved at least the expected level across all Early Learning Goals, a rising trend since 2016.<sup>63</sup>

<sup>58</sup> Nomis (2023). Labour Market Profile. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157267/report.aspx?town=Enfield>)

<sup>59</sup> Enfield Council (2020). Enfield Borough Profile. (see <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>)

<sup>60</sup> Enfield Council (2020). Equality and Diversity Annual Report 2020. (see <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>)

<sup>61</sup> GOV (2019). English indices of deprivation: Local authority district summaries. (see <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>)

<sup>62</sup> Enfield Council (2020). Equality and Diversity Annual Report 2020. (see <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>)

<sup>63</sup> Enfield Council (2020). Equality and Diversity Annual Report 2020. (see <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>)



### Likely future changes without the Traveller Local Plan

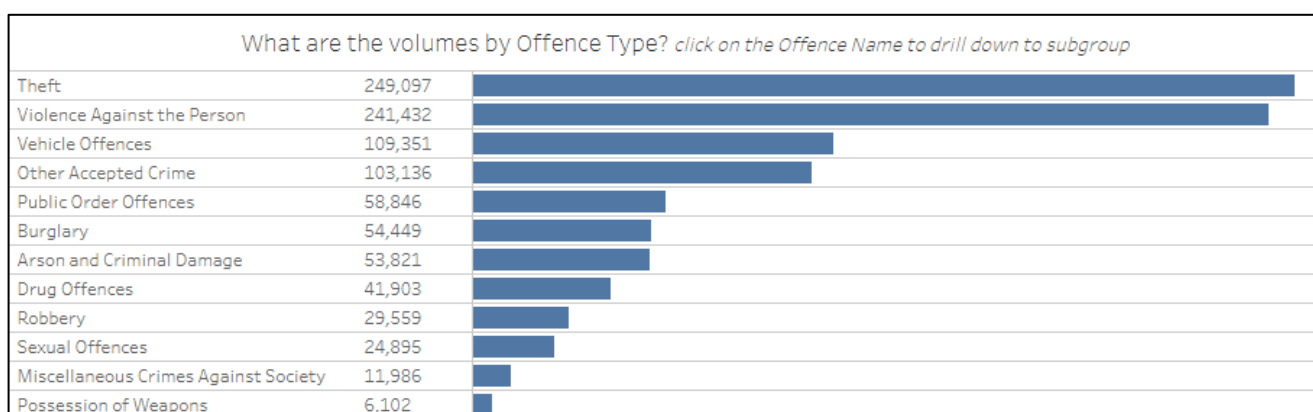
**3.44** Although the population of Enfield has decreased since 2019, it has gradually been increasing over the past 10 years. It is a highly diverse population and there has been a significant increase in Gypsies and Travellers since the 2011 Census. However, Enfield is one of the 20% most deprived local authorities in England. Without the Traveller Local Plan, these trends are likely to continue.

### Crime and community safety

**3.45** According to official crime summary data published by the Metropolitan Police<sup>64</sup>, the number of notifiable offences committed in Enfield between April 2022 and March 2023 was 34,357 – a near negligible reduction of 0.1% compared to the previous 12-month period. The official Met Police crime rate for this period was 103 offences per 1,000 residents which was slightly below the 109.7 offences per 1,000 recorded for the entirety of London.

**3.46** The three most common types of recorded crime in Enfield over this period were ‘Violence Against the Person’ (not including sexual offences), ‘Theft’, and ‘Vehicle Offences’. The largest percentage increase in crime by type of offence was Theft, and largest decrease in percentage attributed to Burglary.

**Figure 3.1: Volume of Offences by Type in Enfield April 2022-March 2023<sup>65</sup>**



**3.47** Data made available through the Enfield Borough Profile 2022<sup>66</sup> shows that 11,861 cases of Antisocial Behaviour were recorded in Enfield in 2021, 30% lower than 2020 levels.

**3.48** Enfield has relatively high proportions of children and young people in comparison to the wider UK. When considering the rate of serious youth violence per 1,000 population aged 1-19, London Borough of Enfield recorded a rate of 6 victims over the last year, the same rate as boroughs with smaller populations such as Haringey, Islington, Hammersmith & Fulham, and Kensington & Chelsea.<sup>67</sup>

**3.49** In the year ending February 2020, knife crime in Enfield had increased by 27.5%, compared to the previous year. Offences had increased to 789 by the end of February 2020 from 619 in the previous year. London experienced a much smaller increase of 5.7% in the same period. Enfield is ranked 8<sup>th</sup> in London for knife crime victims under 24 years old.<sup>68</sup>

<sup>64</sup> Metropolitan Police (2023). Overview of Crimes: Enfield. (see <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

<sup>65</sup> Metropolitan Police (2023). Overview of Crimes: Enfield. (see <https://public.tableau.com/app/profile/metropolitan.police.service/viz/MonthlyCrimeDataNewCats/Coversheet>)

<sup>66</sup> Enfield Council (2022). Enfield Borough Profile 2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0028/28945/Borough-profile-2022-Your-council.pdf.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0028/28945/Borough-profile-2022-Your-council.pdf.pdf))

<sup>67</sup> Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17<sup>th</sup> March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

<sup>68</sup> Enfield Community Safety Unit (2020). Crime and Scrutiny Panel Report 17<sup>th</sup> March 2020. (see <https://governance.enfield.gov.uk/documents/s80680/Crime%20Scrutiny%20Performance%20Report%20-%20March%202020.pdf>)

**3.50** The number of people killed or seriously injured on London's roads was 39% lower than the 2005-2009 baseline and the number of children killed or seriously injured was 65% lower than the baseline. The number of cyclists killed in 2019 is down by 70% on the 2005-2009 baseline, from 17 to 5. Whereas nationally there has been just a 6% decrease since 2008.

**3.51** 2019 saw a reduction in people killed and seriously injured for all transport modes compared to 2018. The numbers of motorcyclists killed and seriously injured declined by 6% and have continued to decline year on year, despite motorcyclist fatalities increasing in 2019. People walking, cycling and motorcycling made up 81% of all people killed or seriously injured. The number of children seriously injured in collisions also fell with the greatest percentage reduction amongst children as bus and coach passengers. However, the number of children seriously injured as pedal cyclists increased.<sup>69</sup>

**3.52** Enfield Council has reported issues with unauthorised encampment activity across the Borough. Between October 2019 and August 2020, there were 10 recorded unauthorised encampment activities in Enfield<sup>70</sup>. The London Gypsies and Travellers group have challenged local authority injunctions on encampments against the Gypsy and Traveller Community. In an appeal by Bromley Council in early 2020 against the High Courts decision to refuse the council application for an injunction against 'persons unknown' stopping on public land, the Court of Appeal dismissed the case.<sup>71</sup> This had implications for boroughs across London in the action they were then able to take against encampment activity. Following this decision, in 2020 Enfield Council withdrew its application to extend its injunction order to 'persons unknown' and was refused an application for a interim injunction as a result of not serving legal documents appropriately.<sup>72</sup>

#### Likely future changes without the Traveller Local Plan

**3.53** The number of notifiable offences committed in Enfield has seen a near negligible decrease and although there has been a decrease in burglaries, there has been an increase in theft. The Traveller Local Plan is unlikely to directly affect levels of crime unless relating to unauthorised encampment activity, and so it is very difficult to anticipate future trends. Without the Traveller Local Plan, there may be an increase in unauthorised developments and encampments due to the lack of allocated sites available for Travellers, and so could lead to tensions between Traveller and settled communities.

### Economy and employment

**3.54** For the period October 2021 to September 2022, 74.5% of Enfield's population were recorded as being economically active, 4.9% lower than the London average and 3.9% lower than the average across Great Britain<sup>73</sup>. However, Enfield's unemployed population, whilst higher than the London average, can be accredited to the Borough's large young adult population, with 25.5% of the population registered as a student, 4.9% higher than the London average. 49.7% of Enfield's population held qualifications of NVQ4 and above in the period between January 2021 and December 2021. Only 4.4% of the Borough's population held no qualifications during the same period.

**3.55** It is important to note that unemployment amongst Gypsy and Traveller communities in the UK is significantly higher than UK averages. Data from the 2021 Census shows that 53% of people aged between 16 and 53 who identified as White: Gypsy or Irish Traveller were economically inactive<sup>74</sup>. Whilst localised statistics are unavailable, it is unlikely for Enfield to stray from this trend.

**3.56** There are a number of barriers that underpin financial and economic exclusion for Gypsy and Traveller communities. Opportunities for these communities to continue traditional forms of employment and self-employment have become more difficult as a result of regulations, for example in the trade of scrap metal<sup>75</sup>. In addition, a lack of formal education or

<sup>69</sup> Transport for London (2020.) Casualties in Greater London during 2019. (see <http://content.tfl.gov.uk/casualties-in-greater-london-2019.pdf>)

<sup>70</sup> London Borough of Enfield GTANA (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see <enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf>)

<sup>71</sup> England and Wales Court of Appeal (Civil Division) Decisions (2020). (see <https://www.bailii.org/ew/cases/EWCA/Civ/2020/12.html>)

<sup>72</sup> London Gypsies and Travellers (2020) A possible end to wide injunctions? (see <http://www.londongypsiesandtravellers.org.uk/news/2020/10/23/a-possible-end-to-wide-injunctions/>)

<sup>73</sup> Nomis (2023). Labour Supply, Enfield. (see <https://www.nomisweb.co.uk/reports/lmp/la/1946157267/report.aspx?town=Enfield#tabeinact>)

<sup>74</sup> Census 2021. Ethnic differences in health, employment, education and housing shown in England and Wales' Census 2021. (see <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/ethnicgroupdifferencesinhealthemploymenteducationandhousingshowninenglandandwalescensus2021/2023-03-15>)

<sup>75</sup> Friends, Families and Travellers (2023). Briefing Economic and Financial exclusion experienced by Gypsies and Travellers in England (see [https://www.gypsy-traveller.org/policy-publications/?wpv\\_post\\_search=economic&wpv\\_aux\\_current\\_post\\_id=5448&wpv\\_view\\_count=5633](https://www.gypsy-traveller.org/policy-publications/?wpv_post_search=economic&wpv_aux_current_post_id=5448&wpv_view_count=5633))

qualifications prevents the opportunities for future employment. The 2021 Census data demonstrates that 57% of Gypsies and Irish Travellers have no qualifications, the worst educational outcome out of all ethnic groups in the country.<sup>76</sup>

### Likely future changes without the Traveller Local Plan

**3.57** Educational attainment and employment prospects are, to an extent, dependent on the provision of quality teaching and supportive community and family environments. Planning does, however, play a role in locating sites within close proximity of educational establishments and employment opportunities. The proportion of people recorded as being economically active in Enfield is likely to remain roughly where it is now, particularly as the Borough has a large young adult population registered as a student. Without the Traveller Local Plan, it is likely that these trends will continue. Sites for Travellers may come forward but in inaccessible locations where there is no easy access to education and employment opportunities.

## Health

**3.58** For the period 2020/21, 59.7% of adults in Enfield were classified as overweight or obese. This is under the national average of 63.8%<sup>77</sup>. Whilst below the national average, current trends suggest that Enfield is at risk of continuous declining physical health within its population. This is further compounded by the prevalence of obesity amongst children in the Borough. Of children in Year 6 and upwards (where records begin to be taken) living in Enfield, 27.3% are classified as overweight, obese, or severely obese, compared to the national average of only 23.4%. This is a significant increase of 3.9% and suggests that Enfield's population is trending towards more behavioural risk factors, and lower levels of health.

**3.59** In 2018/19, 21,558 adults (aged 17 and over) were recorded as having diabetes in Enfield. This constitutes a prevalence of 8.1%, which is the eighth highest in London. Furthermore, it is higher than both the London average of 6.6% and the England average of 6.9%.<sup>78</sup>

**3.60** For the period of 2022/23, 61.4% of adult were recorded as being physically active compared to the national average of 65.9%. Additionally, surveys conducted by the Office for Health Improvement & Disparities concluded that 18.5% of Enfield's population were active smokers, 5.5% above the national average. Similar survey data from 2014/15 provided local level data that showed 3.5% of 15-year olds in Enfield were smokers – lower than London and national averages but an indication that uptake of smoking remains a threat to young people.

**3.61** Life expectancy (at birth) for males between 2018 and 2020 was 80 years, and for females between the same years was recorded at 84.2. Perhaps surprisingly, both of these values were above the national average at the time, despite the aforementioned health and behavioural risk factors trending above the national average.<sup>79</sup>

**3.62** In 2017, Enfield recorded the prevalence of common mental disorders for residents aged 16 and over at 49,261 persons, approximately 19.2% of the Borough's population, and 2.3% above the national average<sup>80</sup>. Additionally, in 2017/18 the estimated number of children and young people with mental disorders (aged 5 to 17) was 7,206 – though this is little sufficient evidence to accurately compare this to national statistics. This includes emotional, conduct, and hyperkinetic disorders.

**3.63** There were 1,718 recorded cases of dementia among people aged 65 and over 5.3% of adults over 65 years of age have been diagnosed with dementia – indicating Enfield has the highest prevalence of recorded cases of dementia in London, and higher than the rate for England. It is higher than both the London average of 6.7% and the England average of 7.1%.<sup>81</sup>

**3.64** Interview respondents to the London Borough of Enfield Gypsy and Traveller Accommodation Assessment cited physical and mental health as a challenge faced specifically by Gypsy and Traveller households. Long term health issues were also cited

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<sup>76</sup> Census 2021. Ethnic differences in health, employment, education and housing shown in England and Wales' Census 2021.

<sup>77</sup> Public Health England (2023). Local Authority Health Profiles: Enfield. (see <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/15/ati/501/are/E09000010/iid/93347/age/187/sex/4/cat/-1/ctf/-1/yr/1/cid/4/tbm/1>)

<sup>78</sup> Enfield Council (2020). Enfield Borough Profile 2020. (see <https://new.enfield.gov.uk/services/your-council/Borough-and-wards-profiles/Borough-profile-2020-your-council.pdf>)

<sup>80</sup> Office for Health Improvement & Disparities (2023). Mental Health and Wellbeing JSNA. (see <https://fingertips.phe.org.uk/profile-group/mental-health/profile/mh-jsna/data#page/1/gid/1938132922/pat/6/ati/402/are/E09000010/iid/93495/age/164/sex/4/cat/-1/ctf/-1/yr/1/cid/4/tbm/1>)

<sup>81</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022 (see [https://www.enfield.gov.uk/data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

as a reason for not travelling<sup>82</sup>. Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average.<sup>83</sup>

**3.65** Travellers face particular barriers to accessing primary healthcare services. A study of 50 GP practices in England by the Friends, Families and Travellers (2019)<sup>84</sup> found that nearly half of all GP practices refused registration to individuals due to no proof of address or identification, despite it not being a regulatory requirement to provide this information.

#### Likely future changes without the Traveller Local Plan

**3.66** The life expectancy of Travellers is significantly lower than the national average and Travellers have cited facing particular issues with physical and mental health. This may in part be due to the fact GP surgeries refuse registration to individuals who have no proof of address or identification, and so Travellers do not receive the medical attention they require. Without the Traveller Local Plan, it is likely this trend will continue – particularly as no authorised pitches or sites for Travellers exist within Enfield and so Travellers have no proof of address. Without the Traveller Local Plan, it is possible that sites used by Travellers may be in isolated locations with no easy access to healthcare facilities, in addition to things like open space, walking and cycling which can have beneficial effects on health and wellbeing.

### Heritage and townscape

**3.67** Enfield has several historic assets designated at local and national scale within its boundaries including five scheduled monuments, the most notable of which is the Earthworks at Old Park (1002047)<sup>85</sup>, 22 conservation areas; 5 registered parks and gardens of special historical interest; 479 statutory listed buildings; 262 local landmarks and landscapes identified on the Local heritage list; and 25 areas of archaeological importance.

**3.68** All 22 conservation areas in the Borough have Conservation Area Character Appraisals. These documents highlight assets which make the areas distinctive and aim to protect the important historical and cultural features. Historic England defines the purpose of Conservation Area Appraisal, Designation and Management Plans as “*the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management*”.<sup>86</sup>

**3.69** Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2022 HAR register<sup>87</sup> records 20 entries that are at risk within the Borough. Of these, six are Grade II\* listed buildings, and two are conservation areas (Church Street and Fore Street). Four are registered parks and gardens (Grovelands, Broomfield and Trent Park) and the remaining HARs are either Grade I or II listed buildings.

#### Likely future changes without the Traveller Local Plan

**3.70** The historic environment can be considered a finite resource. It cannot be replaced and is susceptible to decline over time as historic features experience degradation and decay. However, cultural heritage can evolve and change, and features which are not currently considered a valued part of the historic environment may become so in the future, either due to their uniqueness, past use, or historic or cultural significance. There are many designated and non-designated historic assets and areas of historical and cultural interest in the Borough that could be adversely affected by inappropriate siting of Traveller sites. Without the Traveller Local Plan, unauthorised sites and encampments may be located in areas with particular sensitivities to the historic environment, despite the Local Plan containing policies that seek to protect and enhance the historic environment.

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<sup>82</sup> London Borough of Enfield GTANA (2020). Gypsy and Traveller Accommodation Needs Assessment 2020. (see [enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf](#))

<sup>83</sup> Equality and Human Rights Commission (2017). Gypsies and Travellers: simple solutions for living together. (see <https://www.equalityhumanrights.com/en/gypsies-and-travellers-simple-solutions-living-together>)

<sup>84</sup> Friends, Families and Travellers (2022). Briefing: Health inequalities experienced by Gypsy, Roma and Traveller Communities (see <https://www.gypsy-traveller.org/resource/briefing-health-inequalities-experienced-by-gypsy-roma-and-traveller-communities/>)

<sup>85</sup> Historic England (2023). Map Search: Enfield. (see <https://historicengland.org.uk/listing/the-list/map-search>)

<sup>86</sup> Historic England (2019). Conservation Area Appraisal, Designation and Management. (see <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>)

<sup>87</sup> Historic England (2022). Heritage at Risk Register. (see <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?searchType=HAR&search=Enfield&page=1>)

## Housing

**3.71** In the London Plan<sup>88</sup>, Enfield Borough has a 10 year housing target of 12,460 new homes (1,246 each year) and 3,530 new homes on smaller sites. The Borough must also achieve 195 units per year for older persons.

**3.72** An overall total of 1,041 dwellings were completed (net) for all types of accommodation in the period 2021/22. This figure includes all types of housing such as care home bedrooms and student accommodation, as well as conventional housing. The number of dwellings completed fell short of the GLA's annual housing target for Enfield of 1,246 homes per annum.<sup>89</sup>

**3.73** Enfield has no pitches or plots for Traveller accommodation with the last residential site in Enfield being closed in 1999. According to the London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (October 2020)<sup>90</sup>, Enfield Borough has a five year pitch shortfall from 2020/21 to 2024/25 of 16 pitches. This figure is taken from nine existing households who currently live in bricks and mortar accommodation or are in-migrating to the Borough, combined with emerging households in the next five years. This figure for emerging households is based on the assumption that 50% of children upon reaching 18 years of age will form their own household. Those interviewed in the Gypsy and Traveller Accommodation Needs Assessment identified that sites of six to ten pitches are generally accepted as appropriate among the travelling community. A nomadic lifestyle is an integral part of Gypsy and Traveller tradition, however a shortage of sites results in Travellers being pushed into housing which is not culturally suitable for many.

**3.74** Enfield's Gypsy and Traveller Accommodation Needs Assessment (2020) as summarised at the start of this report concludes that there is a cultural shortfall of 23 pitches over the plan period to 2036, of which 21 pitches are for households who meet the PPTS definition. Evidence indicates that there is an immediate need for 9 pitches (from existing households wanting to move onto a pitch) and an additional need from emerging households for 7 pitches within five years. The Assessment also recommends that the Council considers future applications for small sites to meet the needs of additional families who may emerge over the plan period.

### Likely future changes without the Traveller Local Plan

**3.75** As there are no authorised pitches or sites for Travellers within Enfield, Travellers have been pushed into housing that is not culturally suitable for them or they have alternatively set up unauthorised encampments and sites. It is therefore likely that without the Traveller Local Plan, there will continue to be a shortfall in pitches, resulting in an increase in Travellers being pushed into housing that is not culturally suitable for them and unauthorised encampments.

## Landscape and green infrastructure

**3.76** The Enfield Blue and Green Strategy 2021-2031 seeks to make Enfield the greenest borough in London by 2031, including through achieving a 25% increase in blue-green infrastructure in Enfield.<sup>91</sup>

**3.77** A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London, with an overall "Green Space Score" of 44.56, just 4.28 off the greenest borough, Richmond upon Thames<sup>92</sup>. The overall Green Space Score is calculated using the following survey metrics: amount of green space in hectares; percentage of green space in the Borough; public perception of green space; air quality; public "happiness"; and public anxiety. Whilst this is a significant improvement on previous data showing Enfield as the 9<sup>th</sup> greenest borough, there remains some green space accessibility concerns, particularly with reference to the east of the Borough and the Lee Valley Regional Park. Connections to these areas are restricted by physical barriers including industrial land and the River Lea.<sup>93</sup>

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<sup>88</sup> Mayor of London (2021). The London Plan. (see <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>)

<sup>89</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

<sup>90</sup> Arc (2020). London Borough's Gypsy and Traveler Accommodation Needs Assessment. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0023/5684/enfield-gypsy-and-travellers-assessment-final-report-2020-planning.pdf))

<sup>91</sup> Enfield Council (2020). Enfield's Blue and Green Strategy. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0012/13503/Blue-and-Green-Strategy-Adopted-Planning.pdf))

<sup>92</sup> Essential Living (2020). The Greenest Cities in Europe. (see <https://www.essentialliving.co.uk/blogs-insights/the-greenest-cities-in-europe/>)

<sup>93</sup> Enfield Council (2010). The Enfield Plan Core Strategy 2010-2025. (see [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))

**3.78** Around 40% of the Borough's area is designated Green Belt and there are several sizeable parks within the built-up area. The largest park is Trent Country Park with 400 acres of meadow, woodland, and lakes, plus a water garden, animal corner, café and a full walks and events programme.<sup>94</sup>

**3.79** The quantity of open space (ha per 1,000 population) varies between wards across Enfield. Some wards fall below the recommended open space (quantity) standard. Whilst the quantity of open space / play space is an important factor, quality, value and ease of accessibility of open spaces may have a more significant impact in terms of the recreational offer and benefits afforded to health and wellbeing.<sup>95</sup>

**3.80** According to the latest Annual Monitoring Report, there was no net loss of designated Green Belt or Metropolitan Open Land over the monitoring period 2021/22 with the Borough's Green Belt extent remaining at 3,058ha.<sup>96</sup>

**3.81** According to the latest Annual Monitoring Report, there was no net loss of Protected Open Space over the monitoring period 2021/22 with the area of Protected Open Space remaining at 579ha.<sup>97</sup>

#### Likely future changes without the Traveller Local Plan

**3.82** The Borough's landscapes and townscapes are vulnerable to adverse effects from urban expansion and increasing recreational pressures, particularly as around 40% of the Borough is Metropolitan Green Belt. Without the Traveller Local Plan, it is possible that Traveller sites may come forwards in areas with high landscape sensitivity.

## Transport

**3.83** Enfield's road network comprises approximately 68km of principal roads, 37km of TfL road network, 51km of non-principal classified roads, and 466km of unclassified roads. Only three main roads cross through the Borough; the M25 to the north, the A10 (London to Cambridge) running up through the centre of the Borough, and the A406 (The North Circular) across the southern edge of the Borough.

**3.84** The Borough has 22 train / tube stations and is serviced by four separate lines. These include:

- The London Underground Piccadilly Line – servicing the west of the Borough with four associated stations;
- West Anglia Main line to London – servicing Liverpool Street to Hertford East;
- London Overground – servicing Liverpool Street to Chestnut; and
- Govia Thameslink Railway – servicing Moorgate to Hertford North and Wootton on Stone.

**3.85** Between 2017 and 2019 Network Rail delivered the £170 million Lee Valley Rail programme, which increased capacity on the West Anglia mainline. A significant element of this is the delivery of a new four platform train station at Meridian Water to service the new 10,000 home development in the area. The London Borough of Enfield worked with the Mayor of London to submit a forward funding bid to the Government's Housing Infrastructure Fund (HIF). The objective of the bid was to deliver a four Trains Per Hour service and road infrastructure to unlock the early delivery of homes at Meridian Water.

**3.86** Both Routes 1 and 12 of the National Cycle Network (NCN) run through the London Borough of Enfield. Route 1 comprises a long distance cycle route connecting Dover to Shetland. It runs through the east of Enfield following the River Lea. Route 12 runs in sections from Enfield Lock to Spalding via Stevenage, St Neots, and Peterborough. The section within Enfield is currently incomplete and temporarily starts from Hadley Wood as opposed to Enfield Lock.

<sup>94</sup> Enfield Council (2022). Authority Monitoring Report 2021/2022. (see [https://www.enfield.gov.uk/data/assets/pdf\\_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0015/34107/Authority-monitoring-report-and-5-year-housing-land-supply-2022-Planning.pdf))

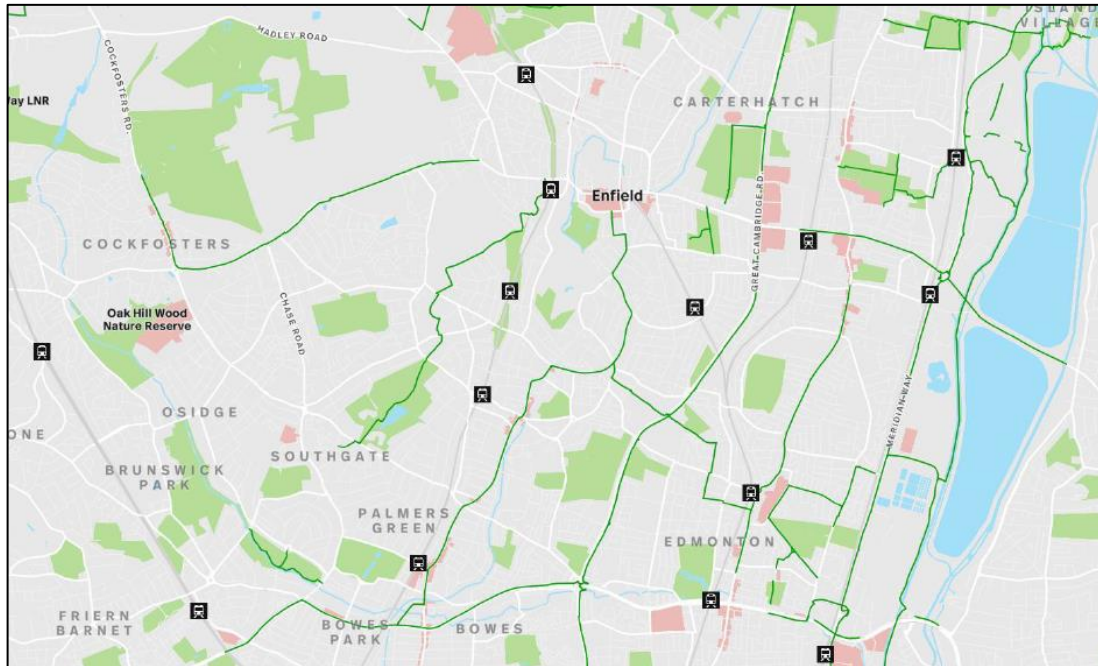
<sup>95</sup> LUC (2020). Enfield Blue and Green Infrastructure Audit. (see [https://www.enfield.gov.uk/data/assets/pdf\\_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf))

<sup>96</sup> LUC (2020). Enfield Blue and Green Infrastructure Audit. (see [https://www.enfield.gov.uk/data/assets/pdf\\_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf))

<sup>97</sup> LUC (2020). Enfield Blue and Green Infrastructure Audit. (see [https://www.enfield.gov.uk/data/assets/pdf\\_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf](https://www.enfield.gov.uk/data/assets/pdf_file/0012/11910/Enfield-Blueand-Green-Infrastructure-Audit-2020-Planning.pdf))

**3.87** The London Borough of Enfield Transport Plan 2019<sup>98</sup> notes that Enfield is one of five Outer London Boroughs identified as having the greatest number of potentially cyclable trips, with nearly 80% of car trips in Enfield of cyclable length. The below figure demonstrates the Borough's established cycle routes, in dark green.

**Figure 3.2: Established cycle routes within LBE<sup>99</sup>**



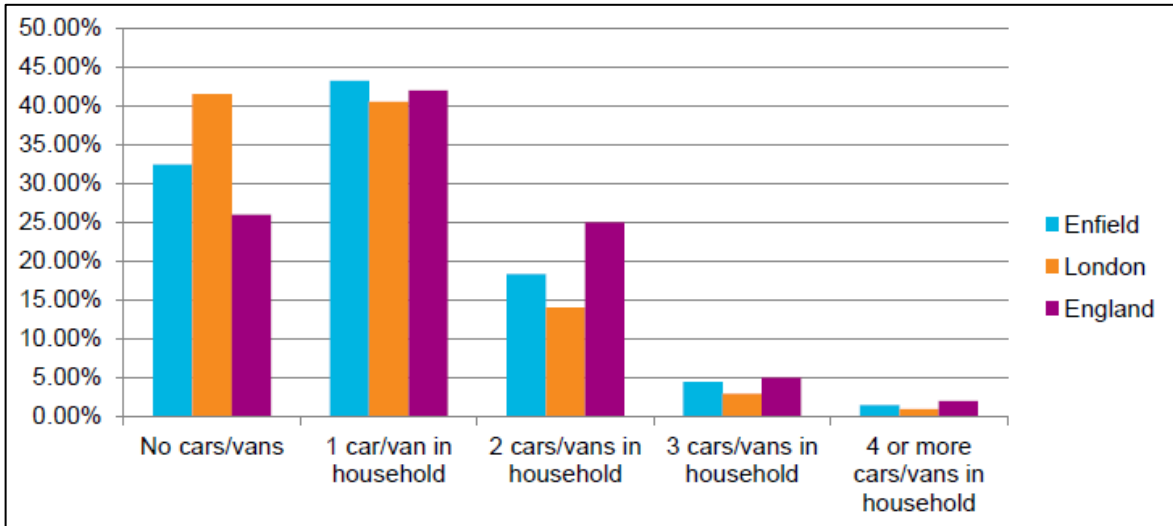
**3.88** Enfield is served by a network of 38-day bus routes, 7 school-day only services, and 8-night bus routes, which altogether service the 547 bus stops within the Borough. The North London Sub-Regional Transport Plan report states that travelling by bus accounts for 14% of all journeys made by LBE residents.

**3.89** With regard to personal vehicles, the below figure, taken from 2011 ONS Census data, demonstrates that approximately 32% of Enfield residents do not own a car or van. This is notable for being significantly below the London regional level (where circa 42% of people do not own a car or van). This may reflect the level of public transport accessed in the Borough. However, given the Borough's issues around inequality and deprivation, it is likely this is a result of affordability, particularly where TfL note Londoners are more likely to own a car if they live in outer London.

<sup>98</sup> Enfield Council (2018). The London Borough of Enfield Transport Plan 2019. (see [https://www.enfield.gov.uk/\\_data/assets/pdf\\_file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf](https://www.enfield.gov.uk/_data/assets/pdf_file/0019/4825/enfield-transport-plan-2019-2041-roads.pdf))

<sup>99</sup> Cycle Enfield (2019). (see <https://journeysandplaces.enfield.gov.uk/>)

Figure 3.3: Car and Van ownership across Enfield, London, and England

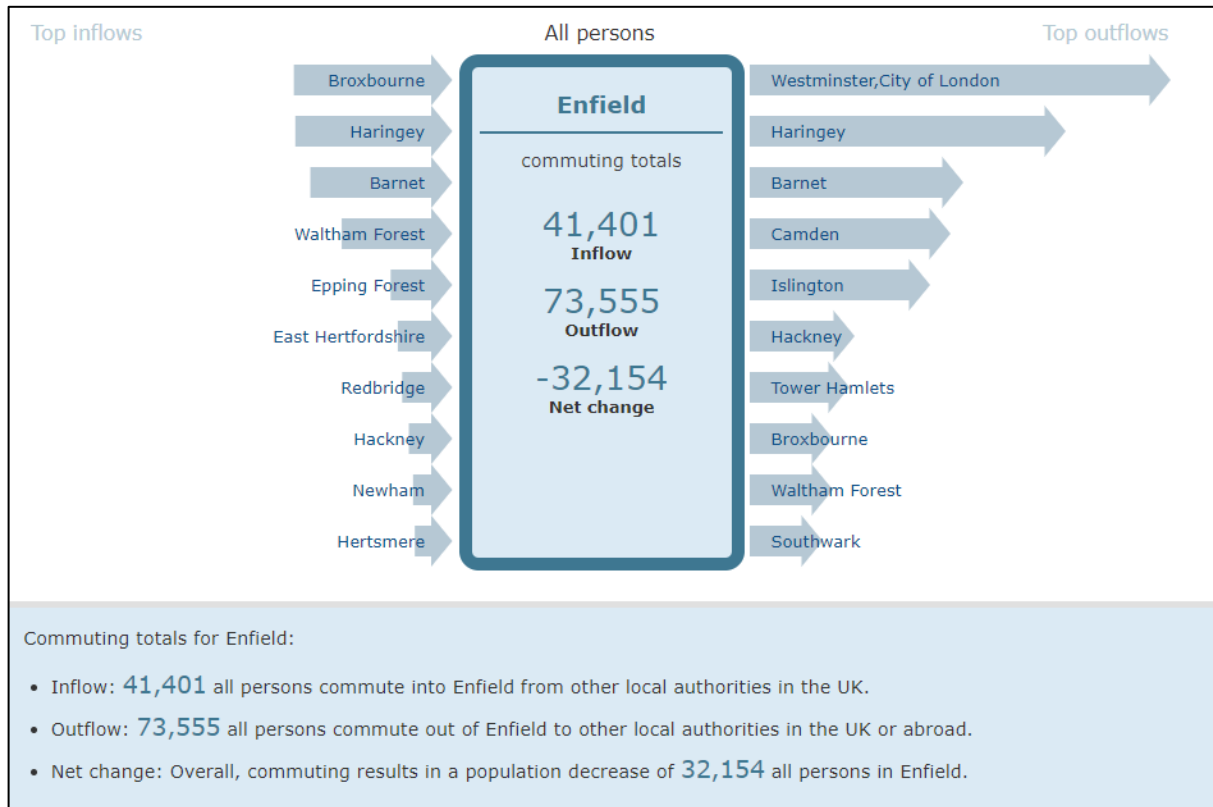


**3.90** It is important to note that this data should be viewed in the context of LBE’s location within Greater London. Statistical comparison with England as a whole should be caveated by the understanding that the public transport model in London, as well as the extent, capacity and modal variety of the network is unique in England. In this context it is likely to be more instructive to compare public transport use in LBE to that of Greater London rather than to England as a whole.

**3.91** Enfield is subject to greater outflow for employment than inflow, with the largest number of commuters, 13,690 outflowing to Westminster, City of London, with only 190 inflowing from this borough. Conversely, more people inflow into Enfield from Broxbourne (5,002) than any other borough, with 2,203 travelling in the opposite direction. As a total, commuting to places of work results in an overall negative flow of people in Enfield of -32,154. This is illustrated below in **Figure 3.4**.



Figure 3.4: Commuting Totals for Enfield – Inflows and Outflows<sup>100</sup>



### Likely future changes without the Traveller Local Plan

**3.92** Commuting trends are likely to continue as they are, although there may be a greater increase in people commuting out of the Borough as the UK continues to recover following the COVID-19 pandemic. As described above, in the last few years there has been a lot of investment in public transport, in particular the opening of Meridian Water railway station in 2019. Around one third of residents in Enfield own a vehicle, which is considerably lower than the London average. It is therefore likely that without the Traveller Local Plan, use of public transport will continue and maybe increase with further investment. Without the Traveller Local Plan, Traveller sites may be in inaccessible locations with no easy access to public transport, as the location of development within close proximity to existing services and facilities can influence use of public transport, and more active modes.

## Water

**3.93** The River Lea is the most significant watercourse running through the Borough. It is the easternmost tributary to the Thames, joining it at Tower Hamlets. The Borough has over 100km of rivers and waterways. The Pymmes Brook, Salmon Brook and Turkey Brook are the main River Lea tributaries that make up LBE’s water network. The Water Framework Directive requires all EU watercourses to achieve a ‘Good’ overall (ecological and chemical) status by 2027. However, as of 2019, the Lea Navigation (Enfield Lock to Tottenham Locks) achieved a ‘Poor’ overall status classification. The classification of other watercourses within Enfield remained the same.<sup>101</sup>

**3.94** The adopted Thames Water WRMP notes that the Thames Water supply area is “designated as seriously water stressed” meaning that demand is very high in relation to available supply. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage. Whilst it also notes that

<sup>100</sup> Nomis (2011). Location of usual residence and place of work by sex. (see <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>)

<sup>101</sup> Environment Agency (2020). Lee Lower Rivers and Lakes. (see <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3275>)

approximately 25% of the water put into supply is lost through leakages. The WRMP estimates that by 2045 there will be a shortfall of 387 million litres of water per day for the Thames Water supply area, and that by 2100 this will rise to 688 million litres of water per day.<sup>102</sup>

**3.95** Regarding wastewater, services for Enfield are provided by Thames Water. The Borough is served by the Deephams Sewage Treatment Works (STW), this serves Enfield as well as the neighbouring Boroughs of Epping, Waltham, Forest, and Haringey. This will need significant upgrade in order to continue to service a growing population.

**3.96** Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, in accordance with the 2015 Nitrate Pollution Prevention Regulations. Waters are defined as polluted if they contain nitrate concentrations greater than 50mg/l. The entirety of the Borough is covered by the Lee NVZS443.

**3.97** Part of the Borough is a Drinking Water Surface Water Protected Area, this is an area where 'raw' water is extracted from rivers or reservoirs. Raw water requires protection to ensure that it is not polluted which could lead to additional purification treatment. As with the majority of the south east of England, LBE is located over a principal aquifer (Chalk), this is also protected for drinking water purposes under the WFD.<sup>103</sup>

#### Likely future changes without the Traveller Local Plan

**3.98** The Borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include transport drainage and wastewater discharged. Without the Traveller Local Plan, it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. However, existing safeguards such as the Water Framework Directive would help to reduce the potential for this to occur. Without the Traveller Local Plan, it is likely that the Thames Water supply area will continue to be seriously water stressed.

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<sup>102</sup> Thames Water (2019). Water Resources Management Plan 2019. (see <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>)

<sup>103</sup> British Geological Survey (2020). Principal aquifers in England and Wales. (see <https://www2.bgs.ac.uk/groundwater/shaleGas/aquifersAndShales/maps/aquifers/home.html>)

## Chapter 4

### Key sustainability issues and opportunities for the Traveller Local Plan to address them

**4.1** Schedule 2 of the SEA Regulations requires the IIA to report on:

"Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC."

**4.2** Analysis of the baseline information has enabled a number of key sustainability issues facing the London Borough of Enfield to be identified. Key sustainability issues for Enfield Borough were previously identified through the Scoping process for the IIA of the emerging Local Plan in 2020, undertaken by AECOM. These issues were reviewed, revised, and supplemented in light of updates to the baseline information, as set out in the June 2021 IIA of the Enfield Local Plan: Main Issues and Preferred Approaches. This chapter draws on this information with specific consideration given to Travellers.

**4.3** By identifying these problems, the IIA can, as a minimum, help the Traveller Local Plan to avoid exacerbating these, and ideally highlight opportunities for the Traveller Local Plan to help to solve them. Such opportunities are also presented within this chapter.

Table 4.1: Key sustainability issues in Enfield and opportunities for the Traveller Local Plan to address them

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
<b>Air Quality</b>		
<p>The London Borough of Enfield experiences problems with air quality, particularly between the east and west of the Borough, and to the south. The entire Borough has been declared an AQMA since 2001 and there are concerns the Ultra-Low Emission Zone in the south of the Borough could potentially result in traffic re-routing in the Borough, which could contribute towards air pollution issues elsewhere. Of particular concern is the effect future development in LBE could have on the Epping Forest SAC.</p>	<p>There is an Air Quality Management Area that covers the Borough, which was designated because the area exceeds thresholds for nitrogen dioxide and PM<sub>10</sub>. Through the site allocation process, the Traveller Local Plan presents the opportunity to effectively locate sites for Travellers at the most appropriate locations to limit reliance on private cars and other contributors to these air emissions. This would in turn promote travel via public transport or active travel modes.</p>	<p>IIA objective 11: Air pollution</p>
<b>Biodiversity</b>		
<p>A 2020 study by Essential Living found that Enfield ranked as the 4th greenest borough in London. However, the Borough contains a number of designated and non-designated biodiversity assets which are experiencing recreational use pressures, as well as poor air quality, particularly the Epping Forest SAC. Habitats and species have the potential to come under increasing pressure from the provision of new housing, employment and infrastructure in Enfield, including at designated sites. This could include through increased disturbance (from recreation, noise and light) and atmospheric pollution as well as the loss of habitats and fragmentation of biodiversity networks. Habitat loss and fragmentation could be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats. Whilst there have recently been several network-led nature conservation efforts set out for the Borough, the Mayor of London classifies 22% of the Borough's population as having a lack of access to nature. Ecological connectivity across the Borough could therefore be improved, in addition to the ecological status of watercourses. Responsible management of sensitive wetlands is required at Lee Valley Regional Park, in addition to improved access.</p>	<p>The Traveller Local Plan presents an opportunity to manage the sensitivities of the sites and biodiversity networks, for example by locating sites away from the most sensitive locations and ensuring that sites are not allocated in areas that affect their current condition. It also provides the opportunity to further promote Lee Valley through new access points, in addition to improving existing ones, whilst also working on improving the ecological status of watercourses. The Local Plan can also promote sustainable drainage and green/blue infrastructure that enables natural cleaning processes to take place (e.g. reed beds) while also serving as a habitat for wildlife.</p>	<p>IIA objective 13: Biodiversity</p>
<b>Climate change adaptation</b>		

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
<p>Climate change is likely to increase temperatures and the subsequent risk of flooding and summer droughts. This is particularly the case in the Borough, where the urban heat island effect results in summer temperatures up to 10°C warmer than more rural areas around Greater London, with the effects of heat more pronounced in the east of LBE, which could worsen as a result of increased urbanisation. Fluvial flood risk provides the greatest flood risk concern and is concentrated in the east of the Borough along the River Lee.</p>	<p>Hotter, drier summers are expected as a result of ongoing and accelerating climate change. Whilst the Traveller Local Plan will not influence extreme weather events, it can build upon the approach of current planning policy to ensure adaptation through design and better respond to current circumstances. This is likely to include protection against extreme weather events, the use of SuDS and green infrastructure as well as promotion of water conservation and recycling. There are opportunities for the Traveller Local Plan to consider adaptation through design to better respond to the extreme weather conditions as described.</p>	<p>IIA objective 2: Climate change adaptation IIA objective 17: Flooding</p>
<b>Climate change mitigation</b>		
<p>While CO<sub>2</sub> emissions have fallen in LBE, the Council has declared a climate emergency and will become a carbon neutral organisation by 2030, and a carbon neutral Borough by 2040. To meet this, the Borough will need to minimise the need to travel and reduce emissions associated with the built environment.</p>	<p>The Traveller Local Plan provides an opportunity to help limit the need to travel in the Borough through the appropriate siting of new sites, in addition to designing buildings in a way that ensures high levels of energy efficiency. Climate change is, however, likely to have ongoing effects regardless of the Traveller Local Plan, considering the scale of the challenge this issue poses.</p>	<p>IIA objective 1: Climate change mitigation IIA objective 12: Sustainable transport</p>
<b>Communities</b>		
<p>In addition to the Borough being characterised by an east-west divide in terms of inequality and deprivation, there are issues around social inclusion with regards to the Gypsy and Traveller community.</p>	<p>There are significant issues around social inclusion within Gypsy and Traveller communities, with many experiencing hate crimes, discrimination in the workplace, and prejudice within the education system. Baseline information suggests these issues are fed by the tensions that arise between Enfield's residential community and Gypsy and Traveller community, that are in of themselves generated by the prominence of unauthorised sites and pitches that lead to public concerns for sanitation, pressure on public services, and disrupting access to certain facilities.</p> <p>The Traveller Local Plan therefore presents an opportunity to have an indirect effect on reducing discrimination and hate crimes towards the Gypsy and Traveller community by assisting in the allocation of authorised sites and pitches that in turn reduce tensions within the community and pressures on services. This may be achieved by ensuring authorised sites are well-integrated into the local community, well located to avoid the aforementioned concerns, and well positioned to foster social inclusion. Without the Traveller Local Plan it is less likely that these issues would be resolved in an effective</p>	<p>IIA objective 6: Social inclusion IIA objective 4: Health and wellbeing</p>

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
	manner that accounts for the baseline information to inform the decision making process.	
<b>Crime and community safety</b>		
Crime is a problem experienced across the Borough and within the Gypsy and Traveller community, hate crimes and discrimination remain prevalent issues.	Within the Gypsy and Traveller community, hate crimes and discrimination remain an issue. The Traveller Local Plan presents the opportunity to have an indirect effect on reducing discrimination and hate crime towards the Gypsy and Traveller community through greater and more sensitive integration within existing communities. This may be achieved through effective site allocation processes, by ensuring sites are sensitively located within the local community, with equal access to necessary facilities to promote inclusion.	IIA objective 7: Crime and community safety
<b>Economy and employment</b>		
Education and skills provision could further meet the needs of Enfield's existing and future labour market, improving life chances for all, including Travellers. This is contributed to, particularly in Enfield, by the lack of authorised sites and pitches for residency.	The Traveller Local Plan presents the opportunity to address this inequality in the educational attainment Travellers and settled communities in the Borough. For example, the allocation process for new authorised pitches and sites can seek to locate these new sites closer to existing or planned educational facilities, or closer to suitable transport networks to these facilities. This would help to encourage young Travellers to attend school and achieve qualifications. As such, it is likely that the evolution of this issue would not be addressed effectively without the Traveller Local Plan.	IIA objective 5: Services and facilities
As the number of unemployed people within the Traveller community is higher than the UK average, it is likely that there are higher levels of unemployment within the Gypsy and Traveller Community in Enfield.	The Traveller Local Plan will not allocate employment sites, but it can promote the allocation of Traveller sites near to areas of employment or within areas where there are good transport links for accessing employment opportunities, thereby promoting access and opportunities for all.	IIA objective 5: Services and facilities
<b>Health</b>		
LBE experiences flagship health issues revolving around air quality, obesity and food deprivation, in addition to access to green spaces. There are also deficiencies in the Borough's health infrastructure with inadequate GP facilities, cross boundary pressure on health services and issues around primary health services.	The provision of improved accommodation through the Traveller Local Plan should support improvements in health, as will siting new pitches in close proximity to essential community provisions such as parks, greenspaces, and healthcare facilities. Without the Traveller Local Plan it is likely that this	IIA objective 4: Health and wellbeing IIA objective 6: Social inclusion

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
	could still be improved, however, improvements may be less targeted and generally less effective without clearly evidenced baseline information.	
<b>Heritage and townscape</b>		
LBE has a rich variety of designated heritage assets, all of which are continuously facing pressures for change, often indirectly, and from inappropriate development and activity affecting their setting and context.	There are many sites, features and areas of historical and cultural interest in the LBW, a number of which (20) are at risk, and which could be further adversely affected by poorly planned development. The Traveller Local Plan presents the opportunity to guide new sites and pitches for Travellers to locations which are less sensitive in terms of their impact on heritage assets (also with consideration for other sustainability issues) through the IIA process.	IIA objective 14: Historic environment
<b>Housing</b>		
No authorised pitches or sites for Travellers exist within Enfield. There is an immediate need for 9 pitches (from existing households wanting to move onto a pitch) and an additional need from emerging households for 7 pitches within five years.	The Traveller Local Plan offers the opportunity to facilitate and expedite the delivery of appropriate homes and allocated sites to meet the changing housing needs of the community.	IIA objective 3: Housing IIA objective 6: Social inclusion
<b>Landscape and green infrastructure</b>		
There are a number of valued landscapes within LBE that fall within the Green Belt, including designed landscapes and extensive semi-rural landscape character areas, all of which need to be protected.	The Traveller Local Plan presents an opportunity to manage the sensitivities of the Boroughs landscapes and greenspaces to reach this goal, for example, by locating sites away from the most sensitive locations and ensuring that sites are not allocated in areas that restrict green infrastructure networks or affect their condition.	IIA objective 15: Landscape and townscape IIA objective 16: Efficient use of land and materials
<b>Transport</b>		
The majority of residents in Enfield use a private car. The Traveller community across the UK has a higher number of people without access to a car. There are no available statistics for this in Enfield but given the size of the Gypsy and Traveller population (just 0.1% of the Borough) it is unlikely that the data would be significantly different.	Through the site allocation process, the Traveller Local Plan can promote the development of Traveller sites and pitches in close proximity to suitable and sustainable transport links to promote equality and sustainable transport modes in tandem. This will help to ensure residents of all communities have equal access to services and facilities further afield.	IIA objective 12: Sustainable transport IIA objective 11: Air pollution IIA objective 1: Climate change mitigation

Key sustainability issues in Enfield	Opportunities for the Traveller Local Plan to address the key sustainability issues	Relevant IIA objectives
Water		
<p>LBE is located within an area of water stress where demand is high and supply is subject to constraints. The Borough is serviced by the Deephams Sewage Treatment Works, which will need significant upgrade in order to continue to service a growing population.</p>	<p>The Traveller Local Plan provides an opportunity to for more specific policy wording that addresses the insufficient supply of water in the Borough and the provision of water infrastructure and upgrades to water resource services, specifically Deephams Sewage Treatment Works.</p>	<p>IIA objective 18: Water</p>
<p>There are a number of water quality issues that impact the Borough, with none of the main watercourses currently meeting the Water Framework Directive (WFD) required ecological status of 'Good'. The Borough is also covered by a number of Source Protection Zones (SPZs) that may be at risk of potential contamination.</p>	<p>The Borough contains waterbodies of poorer water quality which do not meet 'Good' status. Pollution sources responsible for this include agricultural waste and wastewater discharges.</p> <p>Without the Traveller Local Plan it is possible that unplanned development could be in areas that could lead to further water quality issues and risks to the natural environment. The Traveller Local Plan provides an opportunity to ensure that sites for Travellers are located and designed to consider the sensitivity of the water environment and water-dependent protected sites, to plan for adequate wastewater infrastructure, to incorporate sustainable drainage systems (SuDS), and to promote water efficiency and grey water recycling within the Gypsy and Traveller community.</p>	<p>IIA objective 18: Water</p>



## Chapter 5

# Integrated Impact Assessment framework

**5.1** The development of a set of IIA objectives (known as the IIA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

**5.2** The proposed IIA framework for Enfield's Traveller Local Plan is presented overleaf in **Table 5.1**. It is based on the IIA framework used to appraise Enfield's Local Plan; however it has been revised following the analysis of international, national and sub-national plans and programmes, the baseline information, and the key sustainability issues identified for Traveller communities in the Plan area in preceding chapters. The following IIA objectives contained within the IIA framework used to appraise Enfield's Local Plan have been scoped out, as they were considered to be outside the scope of the Traveller Local Plan:

- IIA objective 8: Focus on delivering the 'Vision Zero' target for road safety – the Traveller Local Plan does not intend to address the 'Vision Zero' target for road safety.
- IIA objective 9: Support a strong, diverse and resilient economy that provides opportunities for all – the Traveller Local Plan does not intend to deliver employment; access to existing employment for Travellers is covered under IIA5: Services and facilities instead.
- IIA objective 10: Support the vitality of the Borough's town and local centres – the Traveller Local Plan does not intend to specifically support development within town and local centres

**5.3** The Traveller Local Plan has therefore not been appraised against these three objectives. The numbering of the remaining IIA objectives that the Traveller Local Plan has been appraised against has not changed.

**5.4** The IIA objectives and accompanying questions set out in the IIA framework are subject to change, following feedback collated during consultation on this Scoping and Initial Options Appraisal Report with the three statutory consultees (Environment Agency, Historic England and Natural England) under Regulation 12(5) of the SEA Regulations and other stakeholders.

Table 5.1: IIA framework for the London Borough of Enfield's Traveller Local Plan

IIA Objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
IIA objective 1: Ensure the Traveller Local Plan helps Enfield become a carbon neutral Borough by 2040.	<p>Ensure sites are in sustainable locations that minimise the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Increase the proportion of journeys made via public transport, on foot or by cycle?</p>	<p>Climatic factors</p> <p>Air</p>
IIA objective 2: 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.	<p>Require the incorporation of sustainable design and construction techniques in sites?</p> <p>Ensure that sites are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?</p> <p>Reduce the risk of damage to people and property from extreme weather events?</p>	<p>Climatic factors</p> <p>Human health</p> <p>Biodiversity, flora and fauna</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>
IIA objective 3: Deliver the sites needed to meet the accommodation needs of Gypsies and Travellers, supporting an appropriate mix of permanent sites and transit sites.	<p>Provide an adequate supply of sites to meet the needs of Gypsies and Travellers?</p> <p>Help reduce the number of unauthorised sites and encampments?</p> <p>Ensure sites are managed appropriately?</p> <p>Provide good quality pitches and plots for Gypsies and Travellers?</p> <p>Provide a decent home for all?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 4: Improve the physical and mental health and wellbeing of Gypsies, Travellers and Travelling Showpeople, whilst also reducing health inequalities	<p>Improve access to healthcare?</p> <p>Improve access to outdoor and indoor sport and leisure facilities, in addition to recreation facilities?</p> <p>Improve access to open space and the countryside, including Lee Valley Regional Park, recognising its sensitivity to human disturbance?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>

IIA Objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
between travelling and settled communities.	<p>Limit the risk of air, noise and light pollution on both Gypsies, Travellers and Travelling Showpeople and settled communities, from occupation of and travel to/from sites?</p> <p>Ensure an amenity block is provided at each pitch with access to mains water, electricity, a toilet/bathroom, a kitchen and dining area?</p>	
IIA objective 5: Support good access to services, facilities and wider community infrastructure, for new and existing travelling communities, mindful of the potential for community needs to change over time.	<p>Ensure sites are in sustainable locations that minimise the length of journeys to services and facilities, in addition to employment opportunities?</p> <p>Improve access to good quality services and facilities?</p> <p>Improve access to community facilities?</p> <p>Encourage increased engagement and improved access to leisure and cultural opportunities for Gypsies and Travellers?</p> <p>Locate pitches and plots close to education facilities, so as to support raising attainment and the development of skills, leading to a work ready population of school and college leavers?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 6: Encourage social inclusion, promotion of equality and a respect through diversity.	<p>Develop social cohesion through the appropriate siting of pitches and plots?</p> <p>Help improve access to employment opportunities for Gypsies and Travellers?</p> <p>Facilitate access to community services and facilities?</p> <p>Ensure sites are located within close proximity to open space, encouraging interaction between travelling and settled communities?</p>	<p>Population</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p> <p><i>Equalities Impact Assessment</i></p>
IIA objective 7: Reduce crime and increase community safety.	<p>Support targeted interventions to reduce crime and increase community safety, guided by LBE's Crime and Community Safety team?</p> <p>Reduce levels of crime, anti-social behaviour and the fear of crime through intervention, e.g. public space provision, passive surveillance, lighting, etc.?</p> <p>Help improve access to community and youth facilities in areas where Gypsies and Travellers are based?</p>	<p>Population</p> <p>Human health</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p> <p><i>Community Safety Impact Assessment</i></p>

IIA Objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered (and coverage of HIA, EqIA and CSIA)
	<p>Increase the perception of safety from crime?</p> <p>Promote design of buildings and public spaces to reduce the potential of crime?</p>	
<p>IIA objective 11: Minimise air pollution.</p>	<p>Locate sites away from existing air pollution hotspots?</p> <p>Minimise air pollution caused by traffic and commercial vehicles?</p>	<p>Air</p> <p>Human health</p> <p><i>Health Impact Assessment</i></p>
<p>IIA objective 12: Minimise the need to travel and support a modal shift away from the private vehicle.</p>	<p>Make provision for safe and easy access to public transport services?</p> <p>Promote and facilitate the use of electric cars and sustainable modes of transport?</p> <p>Locate sites in areas with walking and cycling links to more built-up areas with everyday amenities?</p> <p>Provide good access to services and facilities via active travel and public transport?</p>	<p>Population</p> <p>Air</p> <p>Human health</p> <p>Climatic factors</p> <p>Material assets</p> <p><i>Health Impact Assessment</i></p>
<p>IIA objective 13: Avoid/mitigate impacts to valued habitats and ecological networks.</p>	<p>Maintain the integrity of the Epping Forest SAC?</p> <p>Protect locally designated and non-designated biodiversity sites from both the direct and indirect adverse effects of development, including recreational pressure?</p> <p>Avoid impacts of development and human disturbance on Lee Valley Regional Park?</p> <p>Safeguard and strengthen local ecological/green infrastructure networks that contribute to ecological connectivity both within Enfield Borough and their links with ecological networks in neighbouring boroughs?</p> <p>Take into account opportunities to enhance biodiversity in the layout and design of development, including allowing species to adapt to climate change?</p>	<p>Biodiversity, flora and fauna</p>
<p>IIA objective 14: Sustain and enhance the significance of heritage assets.</p>	<p>Support the integrity, special interest, character, appearance and historic setting of historic settlements and heritage assets, both designated and non-designated?</p>	<p>Cultural heritage including architectural and archaeological heritage</p>

IIA Objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered ( <i>and coverage of HIA, EqIA and CSIA</i> )
	<p>Facilitate enhancements to the fabric and setting of the historic environment?</p> <p>Support access to, interpretation and understanding of the historic environment (including through investigations and studies which better reveal the significance of archaeological assets)?</p> <p>Protect, maintain and enhance scheduled monuments and archaeological sites, and their setting?</p> <p>Protect, maintain and enhance registered parks and gardens, and their settings?</p> <p>Improve participation in cultural activities?</p> <p>Promote greater understanding and enhancement of the Borough's historic environment, such as parks and open spaces, and areas with a particular heritage significance?</p>	
<p>IIA objective 15: Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes.</p>	<p>Protect and enhance the landscape and townscape through the appropriate location, layout and design of sites, including the preservation of important open gaps and key views?</p> <p>Protect and enhance the local distinctiveness and contribution to a sense of place?</p>	<p>Landscape</p> <p>Cultural heritage including architectural and archaeological heritage</p>
<p>IIA objective 16: To achieve efficient use of land and materials.</p>	<p>Avoid locating sites on high quality agricultural land?</p> <p>Ensure the re-use and redevelopment of brownfield sites?</p> <p>Encourage minimisation, reuse and recycling of waste?</p>	<p>Soil</p> <p>Material assets</p>
<p>IIA objective 17: To manage and reduce the risk of flooding</p>	<p>Minimise the risk of flooding to people and property from rivers?</p> <p>Avoid allocating sites in locations at risk from flooding or which could increase the risk of flooding elsewhere, taking into account the impacts of climate change?</p> <p>Support the incorporation of Sustainable Urban Drainage Systems (SUDS) (including their long-term maintenance) to reduce the rate of run-off and the risk of surface water flooding and combined sewer overflows?</p>	<p>Human health</p> <p>Water</p> <p>Climatic factors</p> <p><i>Health Impact Assessment</i></p>

IIA Objective	Appraisal questions - Will the Traveller Local Plan...?	Relevant SEA topics covered ( <i>and coverage of HIA, EqlA and CSIA</i> )
IIA objective 18: Minimise water use and protect water quality.	<p>Ensure that development does not lead to the deterioration of groundwater, surface water or river water quality?</p> <p>Locate development where adequate foul drainage, sewage treatment facilities, adequate potable water supply and surface water drainage can be made available?</p> <p>Require the incorporation of SuDS?</p> <p>Increase water efficiency, particularly in new developments through innovative design measures?</p>	Water

## Chapter 6

### Integrated Impact Assessment findings

6.1 This chapter presents the IIA findings of the Issues and Options version of the Traveller Local Plan.

#### Aims and Objectives

6.2 This section presents the IIA findings of Chapter 3 (Aims and Objectives) of the Traveller Local Plan.

#### Aims

6.3 The proposed aims of the Traveller Local Plan are:

1. 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.
2. 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.
3. To reduce the number of unauthorised developments and encampments, and increased integration between the Traveller communities and the settled community.
4. To protect and enhance the special built and natural character of the Borough, including its countryside, open space, Green Belt, and historic environment.

6.4 The likely sustainability effects of the four aims of the Traveller Local Plan in Chapter 3 of the Traveller Local Plan are set out in **Table 6.1** and described below the table.

**Table 6.1: IIA findings for the Traveller Local Plan Aims**

IIA objective	Aim 1	Aim 2	Aim 3	Aim 4
IIA1: Climate change mitigation	0	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	++?	0	+	0
IIA4: Health and wellbeing	+	+	0	0
IIA5: Services and facilities	0	+	0	0
IIA6: Social inclusion	0	+	++	0
IIA7: Crime and community safety	0	0	+	0
IIA11: Air pollution	0	+	0	0
IIA12: Sustainable transport	0	+	0	0
IIA13: Biodiversity	0	0	0	+
IIA14: Historic environment	0	0	0	+
IIA15: Landscape and townscape	0	0	0	+

IIA objective	Aim 1	Aim 2	Aim 3	Aim 4
IIA16: Efficient use of land	0	0	0	0
IIA17: Flooding	0	+	0	0
IIA18: Water	0	0	0	0

**6.5** Aim 1 of the Traveller Local Plan seeks 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. This Aim is therefore likely to have a significant positive effect in relation to **IIA3: Housing**. The effect is recorded as uncertain as it is not clear from this objective whether "assessed accommodation needs" refers to the Planning Policy for Traveller Sites (PPTS) definition of need or the cultural need (see Question 7 of the Issues and Options version of the Traveller Local Plan). The provision of high quality sites as sought by this aim could meet the requirements of a range of user types, including those with protected characteristics and so has the potential to promote personal and social wellbeing. This Aim is therefore also likely to have a minor positive effect in relation to **IIA4: Health and wellbeing**.

**6.6** Aim 2 seeks to provide Traveller sites in areas that provide protection from flooding and enable adequate access to public transport, community facilities such as schools, health centres and shops. This could include facilities that support meetings related to pregnancy or maternity and faith groups, and so will have beneficial effects on those protected characteristics. Overall, the Aim is likely to have minor positive effects in relation to **IIA17: Flooding, IIA6: Social inclusion, IIA4: Health and wellbeing** and **IIA5: Services and facilities**. The Aim will ensure that sites are placed in locations where services and facilities are likely to be accessible, which has potential to reduce reliance on private vehicles and associated CO<sub>2</sub> emissions, whilst also helping to minimise air pollution. This will result in minor positive effects in relation to **IIA12: Sustainable transport, IIA1: Climate change mitigation** and **IIA11: Air pollution**. Reducing reliance on private vehicles will have beneficial effects on public health, including those vulnerable to air pollution, therefore contributing towards the minor positive effect already recorded in relation to IIA4.

**6.7** Aim 3 seeks to reduce the number of unauthorised developments and encampments, in addition to increasing integration between Traveller communities and settled communities. As unauthorised sites and encampments are a source of tension between Traveller and settled communities, this Aim is expected to have a significant positive effect in relation to **IIA6: Social inclusion**, particularly as it seeks to increase integration. A minor positive effect is expected in relation to **IIA3: Housing**, as this Aim will help reduce the number of unauthorised sites and encampments. A minor positive effect is also expected in relation to **IIA7: Crime and community safety**, as this objective seeks to reduce unauthorised developments and encampments.

**6.8** Aim 4 seeks to protect and enhance the special built and natural character of the Borough, including its countryside, open space, Green Belt and historic environment. As no further details are provided, minor positive effects are expected in relation to **IIA15: Landscape and townscape, IIA13: Biodiversity** and **IIA14: Historic environment**.

**6.9** The aims are unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the contribution of the four aims to the achievement of the following IIA objectives is likely to be negligible: IIA2: Climate change adaptation, IIA16: Efficient use of land and IIA18: Water.

### Recommendations

- Aim 1 could be reworded to make clearer whether the Traveller Local Plan seeks to meet the accommodation needs of the PPTS definition of Gypsies and Travellers or the cultural need.
- The relevant aims could be broadened to help achieve IIA2: Climate change adaptation through reference to sustainable design and construction techniques and adaptation to extreme weather events through things like building orientation.
- The relevant aims could be broadened to help achieve IIA16: Efficient use of land by avoiding development on high quality agricultural land, promoting development on brownfield sites and waste management.
- The relevant aims could be broadened to help achieve IIA18: Water through things like protecting water quality, sewerage and the incorporation of Sustainable Drainage Systems.



## Objectives

**6.10** The proposed objectives of the Traveller Local Plan are:

1. 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.
2. 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.
3. 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.
4. A clear framework will be provided for making decisions on future planning applications for Traveller sites within the Borough.

**6.11** The likely sustainability effects of the four objectives of the Traveller Local Plan in Chapter 3 of the Traveller Local Plan are set out in **Table 6.2** and described below the table.

**Table 6.2: IIA findings for the Traveller Local Plan Objectives**

IIA Objective	Objective 1	Objective 2	Objective 3	Objective 4
IIA1: Climate change mitigation	0	+	0	0
IIA2: Climate change adaptation	0	0	0	0
IIA3: Housing	++/-	+	0	+
IIA4: Health and wellbeing	+	+	+	0
IIA5: Services and facilities	0	++	0	0
IIA6: Social inclusion	0	+	+	+
IIA7: Crime and community safety	0	+	+	0
IIA11: Air pollution	0	+	0	0
IIA12: Sustainable transport	0	+	0	0
IIA13: Biodiversity	0	0	0	0
IIA14: Historic environment	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0
IIA16: Efficient use of land	0	0	0	0
IIA17: Flooding	0	0	0	0
IIA18: Water	0	0	0	0

**6.12** Objective 1 of the Traveller Local Plan seeks to provide at least 21 permanent Traveller pitches and a transit / stop over site during the plan period to meet the identified Borough need. This will ensure an adequate supply of pitches is provided to meet the needs of Gypsies, Travellers and Travelling Showpeople. Therefore, a significant positive effect is expected in relation to **IIA3: Housing**. The effect is coupled with a minor negative effect, as the 21 permanent Traveller pitches would meet the need of the Planning Policy for Traveller Sites (PPTS) definition of Gypsies and Travellers but not the cultural need. With regard to **IIA4: Health and wellbeing**, the provision of a stop-over site would allow Travellers to stop off on a temporary basis, and this

would therefore be likely to have minor positive effects in relation to this objective, as it would give them more stability which in turn promotes wellbeing.

**6.13** Objective 2 seeks to deliver sites in sustainable, suitable and safe 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. The provision of sites in sustainable, suitable, and safe locations within Enfield would help meet the requirements of a range of user types, including those with protected characteristics, and help to promote personal and social wellbeing. The delivery of sites with high quality on-site provision specifically designed for Gypsy and Traveller use, and good access to facilities and services is therefore likely to have a significant positive effect in relation to **IIA5: Services and facilities** and a minor positive effect in relation to **IIA3: Housing**. With regard to IIA5, this could include access to community facilities such as schools, health centres and shops, as well as facilities which support meetings related to pregnancy or maternity and faith groups, and so will have beneficial effects on those protected characteristics. Access to services and facilities will help to support the needs of the Traveller community in a variety of ways, which will enhance their wellbeing, and therefore a minor positive effect is anticipated in relation to **IIA4: Health and Wellbeing** and **IIA6: Social Inclusion**. Furthermore, this objective is likely to have minor positive effects in relation to **IIA12: Sustainable Transport**, **IIA1: Climate Change Mitigation** and **IIA11: Air pollution** as high quality on-site provision and placing sites where services and facilities are likely to be accessible has the potential to reduce reliance on private vehicles which would reduce CO<sub>2</sub> emissions thus helping to minimise air pollution. This will also have beneficial effects on the protected characteristics, particularly to those vulnerable to air pollution. This objective is likely to have minor positive effects against **IIA7: Crime and community safety** as sites will be placed in safe locations, which will help to increase the perception of safety from crime.

**6.14** Objective 3 seeks 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. Therefore, a minor positive effect is expected in relation to **IIA7: Crime and community safety**. The provision of a negotiating stopping policy will help to reduce the number of unauthorised sites and encampments, as it will allow Travellers to negotiate to remain where they are or move to an alternative location nearby. This is likely to have a minor positive effect with regard to **IIA4: Health and Wellbeing** as Travellers will be much less likely to be evicted or prosecuted for roadside stopping, which gives Travellers more stability and reduced stress at the threat of eviction. This objective is also likely to have a minor positive effect in relation to **IIA6: Social Inclusion** as unauthorised sites can be a source of tension between Traveller and settled communities. Minimising these could therefore have beneficial effects on social cohesion.

**6.15** Objective 4 seeks to provide a clear framework for making decisions on future planning applications for Traveller sites within the Borough. Uncertain minor positive effects are recorded in relation to **IIA3: Housing** and **IIA6: Social Cohesion** as the provision of a clear framework may ensure Traveller sites are provided where and when needed. However, uncertainty is recorded as no further details have been provided.

**6.16** The aims are unlikely to have any adverse effects in relation to the IIA objectives. Due to the fact they are not specifically mentioned or indirectly affected, the contribution of the four objectives to the achievement of the following IIA objectives is likely to be negligible: IIA2: Climate change adaptation, IIA13: Biodiversity, IIA14: Historic environment, IIA15: Landscape and townscape, IIA16: Efficient use of land, IIA17: Flooding and IIA18: Water.

#### Recommendations

- Further detail could be added in relation to Objective 4, as at present it is lacking in detail.

### Issues and Options

**6.17** This section presents the IIA findings of Chapter 4 (Issues and Options) of the Traveller Local Plan.

#### Question 7

Q7: Should the Traveller Local Plan 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.

- **Option 1:** Provide for the 'cultural' need (23 pitches)

■ **Option 2:** Provide for the Planning Policy for Traveller Sites need (21 pitches)

**Table 6.3: IIA findings for Q7**

IIA objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Housing	++	++/-
IIA4: Health and wellbeing	+	+/-
IIA5: Services and facilities	0	0
IIA6: Social inclusion	+	+/-?
IIA7: Crime and community safety	0	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

**6.18** The Gypsy and Traveller Accommodation Needs Assessment 2020 establishes an overall 'cultural' need for 23 pitches, which is a slightly higher than the Planning Policy for Traveller Sites definition of need at 21 pitches. The PPTS 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. Option 2 which utilises this narrower definition receives a mixed significant positive and minor negative effect in relation to **IIA3: Housing**. The significant positive effect acknowledges the fact that the needs of the PPTS definition of Gypsies and Traveller would be met, whilst the minor negative effect acknowledges the fact that the needs of those who no longer travel would not be met. Option 1 is expected to have a significant positive effect only, as it meets the accommodation needs of all, including those who no longer travel and which is likely to include older people.

**6.19** Option 2 receives a mixed minor positive and minor negative effect in relation to **IIA4: Health and wellbeing**, as while it will meet the needs of the PPTS definition of Gypsies and Travellers, it will not meet the cultural need and so could have an adverse effect on personal and social wellbeing. Option 2 also receives a mixed minor positive and minor negative effect in relation to **IIA6: Social inclusion** as not meeting the cultural need would not accord with the Council's wider obligations to meet all needs, and may contribute to an increase in unauthorised developments and encampments which can be a source of tension between Traveller communities and settled communities, although this is uncertain. Option 1 receives minor positive effects in relation to IIA2 and IIA6, as it will contribute to the needs of all Gypsies and Travellers, including those who have ceased to travel.

**6.20** Negligible effects are expected against the remaining IIA objectives.

## Recommendations

- No recommendations.

## Question 9

Q9: Which of the identified policy options above are most appropriate for the Traveller Local Plan? Please explain your answer.

- **Option 1:** Allocate small new sites
- **Option 2:** Allocate one large site
- **Option 3:** Provide pitches as part of large housing developments
- **Option 4:** Liaise with neighbouring local authorities to address the identified need
- **Option 5:** Do nothing

Table 6.4: IIA findings for Q9

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA1: Climate change mitigation	+?/-?	-?	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0
IIA3: Housing	++/-?	++	++	+++?	0
IIA4: Health and wellbeing	+?/-?	+?/-?	+++/-?	+?/-?	0
IIA5: Services and facilities	+?/-?	+?/-?	+++/-?	--?/+?	0
IIA6: Social inclusion	+?/-?	-?	+?/-?	+?/-?	0
IIA7: Crime and community safety	0	0	0	0	0
IIA11: Air pollution	+?/-?	-?	0	0	0
IIA12: Sustainable transport	+?/-?	-?	0	0	0
IIA13: Biodiversity	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land	+	0	0	0	0
IIA17: Flooding	0	0	0	0	0
IIA18: Water	0	0	0	0	0

**6.21** Options 1 to 4 are expected to have significant positive effects in relation to **IIA3: Housing** as they will all deliver the identified permanent need for pitches. The significant positive effect for Option 1 is, however, coupled with an uncertain minor negative effect, as it is possible that due to the size of the sites, they are more likely to be privately owned and therefore not affordable, although this is uncertain. The significant positive effect for Option 4 is recorded as uncertain, as neighbouring authorities may not have the capacity to take on additional need from elsewhere, which could potentially result in a shortfall in sites.

**6.22** A mixed uncertain minor positive and uncertain minor negative effect is expected in relation to **IIA5: Services and facilities** for Option 1. This is because the small new sites could be allocated in urban areas or rural areas, and therefore depending on their location may have good or poor access to existing services and facilities. For this reason, Option 1 is expected to have mixed uncertain minor positive and uncertain minor negative effects in relation to **IIA4: Health and wellbeing** and **IIA6: Social inclusion**, as these objectives cover things like access to healthcare and community facilities which can have positive effects on people's health and wellbeing. A mixed uncertain minor positive and uncertain minor negative effect is also expected in relation to **IIA12: Sustainable transport**, as Option 1 could either increase or decrease reliance on private vehicles. Option 2 is likely to have an uncertain minor negative effect in relation to IIA5, in addition to IIA4 and IIA6 as according to the Traveller Local Plan, the site would likely be located in a rural area, outside of settlements and so in a less accessible location. Therefore, Travellers would have poor access to everyday amenities, in addition to things like employment opportunities. This would also increase reliance on private vehicles, resulting in an uncertain minor negative effect in relation to IIA12. The increased reliance on private vehicles has the potential to contribute towards air pollution, in addition to greenhouse gas emissions, and so an uncertain minor negative effect is also expected for Option 2 in relation to **IIA11: Air pollution** and **IIA1: Climate change mitigation**. As Option 1 could either increase or decrease reliance on private vehicles, it is expected to have mixed uncertain minor positive and uncertain minor negative effects in relation to IIA11 and IIA1. Option 2 does, however, propose the allocation of one large site, and it is more viable for larger sites compared to smaller sites (Option 1) to incorporate amenities like sewerage, water supply, electricity and utility buildings. The uncertain minor negative effects Option 2 has in relation to IIA4 and IIA5 are therefore mixed with uncertain minor positive effects.

**6.23** Option 3 is expected to have an uncertain significant positive effect in relation to **IIA5: Services and facilities**, as the pitches would be integrated into large housing developments and therefore contribute towards creating sustainable, mixed communities. According to the Traveller Local Plan, larger schemes like this would most likely be located in areas with good access to existing services and facilities. This could include facilities that support meetings related to pregnancy or maternity and faith groups. However, large schemes can take a long time to be delivered, which could result in new services and facilities not being delivered until development is almost complete. Therefore, the effect is coupled with an uncertain minor negative effect. Option 3 is also expected to have a mixed uncertain significant positive and uncertain minor negative effect in relation to **IIA4: Health and wellbeing**, as pitches would most likely be located close to existing healthcare facilities and other services within new developments, and could therefore be accessed more easily by walking or cycling, which has beneficial effects on people's health and wellbeing. However, large schemes as proposed under this option can take a long time to be delivered and therefore may not initially meet people's everyday needs. A mixed uncertain minor positive and uncertain minor negative effect is expected for Option 3 in relation to **IIA6: Social inclusion**, as it would contribute towards the creation of mixed communities. However, integrating pitches into large new housing developments could generate some issues with social cohesion between Traveller and settled communities. Option 4 is expected to have a mixed uncertain significant negative and uncertain minor positive effect in relation to IIA5, as although sites may be allocated near settlements with good access to services and facilities, some (or all) of them could be located in neighbouring boroughs, which is unlikely to be convenient for most people whose need for accommodation arises in the Borough. For this reason, mixed uncertain minor positive and uncertain minor negative effects are also expected in relation to IIA4 and IIA6. Travellers may feel isolated from others and introducing them into existing communities elsewhere could be contentious and cause conflict.

**6.24** Option 1 is expected to have an uncertain minor positive effect in relation to **IIA16: Efficient use of land** as the allocation of small new sites, particularly within urban areas, could encourage the utilisation of brownfield sites, although this is uncertain. Negligible effects are expected against the remaining IIA objectives.

**6.25** Option 5 (Do nothing) represents the baseline against which the effects of the Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objectives.

### Recommendations

- No recommendations.

### Questions 12 to 13

Q12: 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.

Q13: If allocating more than one site to meet the identified permanent need, how many pitches should be allocated per site? Please explain your answer.

- **Option 1:** Allocate a larger number of smaller sites
- **Option 2:** Allocate a smaller number of larger sites

Table 6.5: IIA findings for Q12-13

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Housing	++/-?	++
IIA4: Health and wellbeing	+/-?	+?/-
IIA5: Services and facilities	-?	+?
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	0	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	+?	-?
IIA17: Flooding	0	0
IIA18: Water	0	0

**6.26** Option 1 seeks to allocate a larger number of smaller sites, whilst Option 2 seeks to allocate a smaller number of larger sites. Both options are likely to have a significant positive effect in relation to **IIA3: Housing** as they both seek to provide sufficient pitches to meet the assessed accommodation needs of the Traveller communities. However, smaller sites are more likely to be privately owned, which may result in pitches not being affordable. As such, the significant positive effect against IIA3 for Option 1 is coupled with an uncertain minor negative effect.

**6.27** Options 1 and 2 are both expected to have minor positive effects in relation to **IIA4: Health and wellbeing**, as ensuring all Travellers have a pitch will have beneficial effects on their health and wellbeing. With regard to Option 2, it is more viable for larger sites to incorporate everyday amenities like sewerage, water supply, electricity and utility buildings, which would help contribute towards this minor positive effect. It would, however, add some uncertainty as it is unknown whether these amenities would be delivered or not. As Option 1 proposes smaller sites it is unlikely that everyday amenities would be provided, and so the minor positive effect is mixed with an uncertain minor negative effect. The Issues and Options version of the Traveller Local Plan acknowledges that stakeholders prefer smaller sites as this is a more comfortable environment and so while this would contribute to the minor positive effect already recorded for Option 1 against IIA4, it would result in the minor positive effect for Option 2 being coupled with a minor negative effect.

**6.28** Option 2 is expected to have an uncertain minor positive effect in relation to **IIA5: Services and facilities**, as it is likely to be more viable for larger sites to incorporate things like sewerage, water supply, electricity and utility buildings than smaller sites where this may not be viable. Conversely, Option 1 is expected to have an uncertain minor negative effect as it may not be viable for smaller sites to provide these sorts of amenities. It is unknown where sites proposed by these two options would be located.

**6.29** Option 2 is expected to have an uncertain minor negative effect in relation to **IIA15: Efficient use of land**, as larger sites may utilise more greenfield land, which may be high quality agricultural land. Conversely, Option 1 is expected to have an uncertain minor positive effect in relation to this objective as it may not utilise as much greenfield land as Option 2, and may in fact encourage utilisation of brownfield sites.

**6.30** Negligible effects are expected against the remaining IIA objectives.

### Recommendations

- No recommendations.

### Question 14

Q14: Should the Traveller Local Plan consider including a rural exception sites policy? If so, please explain your answer.

- **Option 1:** Include a rural exception sites policy
- **Option 2:** Do not include a rural exception sites policy

Table 6.6: IIA findings for Q14

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	-	0
IIA2: Climate change adaptation	0	0
IIA3: Housing	++	-
IIA4: Health and wellbeing	+/-	-
IIA5: Services and facilities	-	0
IIA6: Social inclusion	-	0
IIA7: Crime and community safety	0	0
IIA11: Air pollution	-	0
IIA12: Sustainable transport	-	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	-?	0
IIA16: Efficient use of land	-?	0
IIA17: Flooding	0	0
IIA18: Water	0	0

**6.31** Option 1 supports the inclusion of a rural exception sites policy, which would enable sites to come forward where Traveller sites would not normally be allowed and ensure that these sites remain affordable in perpetuity. This is likely to have a significant positive effect in relation to **IIA3: Housing** as this option would ensure there are affordable Traveller pitches. This option is also likely to have a minor positive effect in relation to **IIA4: Health and wellbeing** as housing is an important social determinant of health, and the provision of affordable pitches for Traveller accommodation would reduce accommodation insecurity which would in turn improve wellbeing and general health outcomes. The minor positive effect against IIA4 is, however, mixed with a minor negative effect, as a rural exception site could be located in an area with poor access to services and facilities, including healthcare, which could have adverse effects on people's health. Option 2 does not support the inclusion of a rural exception sites policy, and so is likely to have a minor negative effect in relation to IIA3, as well as IIA4, as the opportunity to provide permanent and genuinely affordable Traveller sites would be missed and potentially result in a shortfall of affordable Traveller pitches. This is likely to have implications for health and wellbeing as health outcomes and quality housing are interconnected; a lack of affordable housing / sites contributes to a myriad of mental health problems, such as stress, anxiety and depression.

**6.32** Option 1 is likely to have a minor negative effect in relation to **IIA12: Sustainable transport**, as rural areas tend to have poorer access to jobs, services and facilities than towns, and continue to lose services and facilities. By siting Traveller sites in rural areas where housing would not normally be allowed, it would encourage private vehicle use so as to reach essential services. Therefore, Option 1 is also expected to have minor negative effects in relation to **II1: Climate change mitigation** and **IIA11: Air pollution**, in addition to **IIA5: Services and facilities**. Travellers may also experience feelings of isolation being located in a rural area away from settlements, and therefore a minor negative effect is expected in relation to **IIA6: Social inclusion**. Uncertain minor negative effects are expected in relation to **IIA15: Landscape and townscape** and **IIA16: Efficient use of land**, as the allocation of sites in rural areas where housing development would not normally be allowed could have adverse effects on the landscape and agricultural land, although this is uncertain.

**6.33** Negligible effects are expected against the remaining IIA objectives.

### Recommendations

- No recommendations.

### Question 15

Q15: Which of these management options is preferred? Please explain your answer.

- **Option 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.
- **Option 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.
- **Option 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.
- **Option 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.
- **Option 5:** A variety of means of tenure could be spread across the allocated sites.

Table 6.7: IIA findings for Q15

IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA1: Climate change mitigation	0	0	0	0	0
IIA2: Climate change adaptation	0	0	0	0	0



IIA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
IIA3: Housing	+?/-?	++	++?/-?	+?/-?	+
IIA4: Health and wellbeing	0	+	+	+?/-?	0
IIA5: Services and facilities	0	+	+	+?/-?	0
IIA6: Social inclusion	0	+/-	0	-	0
IIA7: Crime and community safety	0	0	0	+/-	0
IIA11: Air pollution	0	0	0	0	0
IIA12: Sustainable transport	0	0	0	0	0
IIA13: Biodiversity	0	0	0	0	0
IIA14: Historic environment	0	0	0	0	0
IIA15: Landscape and townscape	0	0	0	0	0
IIA16: Efficient use of land	0	0	0	0	0
IIA17: Flooding	0	0	0	0	0
IIA18: Water	0	0	0	0	0

**6.34** Both Options 2 and 3 are anticipated to have significant positive effects in relation **IIA3: Housing**. Option 2 seeks to provide allocated sites which form part of the affordable housing provided on a private housing development, whilst Option 3 states that the Council or Registered Social Landlord will buy the allocated land and then sell or rent the site to occupants. Both options would ensure that there is sufficient supply of affordable sites to meet the needs of Gypsies and Travellers. However, the effect for Option 3 is coupled with a minor negative effect, with both effects recorded as uncertain. This is due to the fact the site could be sold to Travellers but it is unknown whether it would be affordable or not. Both options seek to make provision for facilities which include access, land drainage, sewerage, and water and electricity as a minimum. This will improve the quality of sites for Travellers. Minor positive effects are expected in relation to **IIA4: Health and wellbeing** and **IIA5: Services and facilities** due to good access and connectivity to essential facilities and services, which have clear health and wellbeing benefits. Option 4 is likely to have a mixed uncertain minor positive and uncertain minor negative effect in relation to IIA3, as well as mixed uncertain minor positive and uncertain minor negative effects in relation to IIA4 and IIA5, as the land allocated to Travellers will be privately owned and rented to the occupants with or without facilities. As the sites will be privately owned, they could be expensive, which could potentially see an increase in unauthorised developments and encampments which are a source of tension between Traveller communities and settled communities. This Option could therefore also have a minor negative effect in relation to **IIA6: Social inclusion**. Option 2 is expected to have a mixed minor positive and minor negative effect in relation to IIA6, as integrating affordable pitches into new housing developments could create tensions between Traveller and settled communities. Option 1 is expected to have a mixed uncertain minor positive and uncertain minor negative effect in relation to IIA3, as the land would be sold to Travellers who are then responsible for the site. However, it is unknown how affordable purchasing the site would be, which may not be viable for some.

**6.35** A mixed minor positive and minor negative effect is expected for Option 4 in relation to **IIA7: Crime and community safety**, as the sites would be privately owned, which could make them expensive and potentially result in an increase in unauthorised developments and encampments. However, the option also stipulates that the site owner is most likely to manage the maintenance of the site if it remains in his/her ownership. This would ensure that the site is effectively managed and maintained, which would discourage crime.

**6.36** Option 5 seeks to provide a variety of means of tenures to be spread across the allocated sites. An uncertain minor positive effect is therefore recorded in relation to **IIA3: Housing** as the addition of different means of tenures; socially-owned and managed-sites as well as scope to incorporate alternative methods of site management and ownership, for example in the

form of co-operatives, could provide innovative solutions to tackle deliverability. However, uncertainty is recorded as no further details have been provided.

**6.37** Negligible effects are expected against the remaining IIA objectives.

### Recommendations

- Options 2 and 3 refer to various amenities that should be provided at all sites. In addition to these amenities, developers (including the Council or Registered Social Landlord) should ensure any building they provide meets high energy efficiency standards in line with the Council's commitment to be a carbon neutral organisation by 2030 and a carbon neutral borough by 2040. Consideration should also be given to adaptation through design (e.g. building orientation) to better respond to extreme weather conditions as a result of climate change.

### Question 16

Q16: Should the Traveller Local Plan contain a policy relating to design requirements for new Traveller sites? If so, what matters should be included?

- Option 1:** Include a design policy
- Option 2:** Do not include a design policy

Table 6.8: IIA findings for Q16

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	+?	0
IIA3: Housing	+	0
IIA4: Health and wellbeing	+?	0
IIA5: Services and facilities	0	0
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	+?	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	+	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

**6.38** Option 1 supports the inclusion of a design policy for new Traveller sites. This is likely to have a minor positive effect in relation to **IIA15: Landscape and townscape** and **IIA3: Housing**, as providing design requirements would help ensure that

there are consistently high-quality sites being designed and created for Travellers. This Option is also likely to have an uncertain minor positive effect in relation to **IIA2: Climate change adaptation**. Although the Option does not provide detail of what the policy would include, good design is understood as a key aspect of sustainable development, and therefore this policy could detail design which responds to climate change adaptation. Uncertain minor positive effects are also anticipated in relation to **IIA4: Health and wellbeing** and **IIA7: Crime and community safety**, as design requirements which promote well-designed sites will create safer and more sustainable Traveller sites, with beneficial effects on people's health. Negligible effects are expected against the remaining IIA objectives.

**6.39** Option 2 (Do not include a design policy) represents the baseline against which the effects of the Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objective.

### Recommendations

- A design policy should address climate change mitigation and adaptation by ensuring buildings are energy efficient and designed to respond to extreme weather events, respectively.

### Question 17

Q17: Should the Traveller Local Plan provide for a transit site / stop over site, and if so, what size is considered suitable?

- **Option 1:** Provide a transit / stop over site
- **Option 2:** Do not provide a transit / stop over site

Table 6.9: IIA findings for Q17

IIA Objective	Option 1	Option 2
IIA1: Climate change mitigation	0	0
IIA2: Climate change adaptation	0	0
IIA3: Housing	++	0
IIA4: Health and wellbeing	+	0
IIA5: Services and facilities	+?	0
IIA6: Social inclusion	0	0
IIA7: Crime and community safety	+/-?	0
IIA11: Air pollution	0	0
IIA12: Sustainable transport	0	0
IIA13: Biodiversity	0	0
IIA14: Historic environment	0	0
IIA15: Landscape and townscape	0	0
IIA16: Efficient use of land	0	0
IIA17: Flooding	0	0
IIA18: Water	0	0

**6.40** Option 1 is expected to have a significant positive effect in relation **IIA3: Housing**, as providing a transit / stop over site will accommodate the needs of Gypsies and Travellers on the move. For this reason, Option 1 is expected to have a minor positive effect in relation **IIA4: Health and wellbeing**, as the presence of a transit / stop over site would reduce accommodation insecurity which would in turn improve wellbeing and general health outcomes. A minor positive effect is expected in relation to **IIA5: Services and facilities**, as if a transit site is provided it should have the same services as a permanent site, such as water supply, electricity and refuse collection. The effect is uncertain as the actual effect is dependent on whether a transit site or stop over site would be provided (stop over sites do not need to be equipped to the same standard as a permanent or transit site). The presence of a transit / stop over site could reduce unauthorised encampments and therefore a minor positive effect is expected in relation to **IIA7: Crime and community safety**. The effect is coupled with an uncertain minor negative effect, as the site would not provide permanent accommodation but there is a danger of it being used permanently. Negligible effects are expected against the remaining IIA objectives.

**6.41** Option 2 (Do not provide a transit / stop over site) represents the baseline against which the effects of the Traveller Local Plan are being assessed by the IIA and so negligible effects are expected in relation to all the IIA objectives.

#### Recommendations

- No recommendations.

# Chapter 7

## Conclusions

**7.1** In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment agency, Historic England, and Natural England) are being sought in relation to the scope and level of detail to be included in the IIA Report.

**7.2** The consultees are in particular requested to consider whether:

- The scope of the IIA is appropriate, considering the role and priorities of the Traveller Local Plan.
- The key plans and programmes relevant to the Traveller Local Plan and IIA have been identified.
- The baseline information provides a suitable basis against which the Plan's effects can be assessed and monitored.
- Significant sustainability problems/issues of relevance to the Traveller Local Plan have been identified, focusing on aspects that the Plan can influence.
- The defined IIA framework is fit for purpose and includes a suitable set of IIA objectives for assessing the effects of the Traveller Local Plan and reasonable alternatives.

**7.3** Responses from consultees will be reviewed and appropriate amendments made to the scoping information, including to the baseline, policy context and IIA framework and accompanying appraisal questions where necessary. These will be reflected in the IIA report at the next stage of plan-making.

**7.4** This IIA report also provides an appraisal of reasonable alternative options for the policies to be included in the Traveller Local Plan. The results of these assessments and any identified recommendations will inform Enfield Council's Plan Making Team in their preparation of subsequent iterations of the Traveller Local Plan. Consultees views are welcomed on whether an appropriate range of reasonable alternatives has been considered by the Council and whether the IIA has correctly identified the likely significant effects.

### Recommendations

**7.5** The following recommendations have been made regarding the wording of options identified in the Traveller Local Plan:

**Table 7.1: IIA recommendations**

Option assessed	IIA recommendation
Aim 1	Aim 1 could be reworded to make clearer whether the Traveller Local Plan seeks to meet the accommodation needs of the PPTS definition of Gypsies and Travellers or the cultural need.
Aims generally	The relevant aims could be broadened to help achieve IIA2: Climate change adaptation through reference to sustainable design and construction techniques and adaptation to extreme weather events through things like building orientation.
Aims generally	The relevant aims could be broadened to help achieve IIA16: Efficient use of land by avoiding development on high quality agricultural land, promoting development on brownfield sites and waste management.
Aims generally	The relevant aims could be broadened to help achieve IIA18: Water through things like protecting water quality, sewerage and the incorporation of Sustainable Drainage Systems.
Objective 4	Further detail could be added in relation to Objective 4, as at present it is lacking in detail.
Q15 – Options 2 and 3	Options 2 and 3 refer to various amenities that should be provided at all sites. In addition to these amenities, developers (including the Council or Registered Social Landlord) should ensure any building they provide meets high energy efficiency standards in line with the Council's commitment to be a carbon neutral organisation by 2030 and a carbon neutral borough by 2040. Consideration

Option assessed	IIA recommendation
	should also be given to adaptation through design (e.g. building orientation) to better respond to extreme weather conditions as a result of climate change.
Q16 – Option 1	A design policy should address climate change mitigation and adaptation by ensuring buildings are energy efficient and designed to respond to extreme weather events, respectively.

### Next steps

**7.6** This Scoping and Initial Options Appraisal Report will be available for consultation alongside the Traveller Local Plan: Issues and Options (Regulation 18) in Autumn 2023.

**7.7** The consultation responses on the Regulation 18 Traveller Local Plan and this IIA: Scoping and Initial Options Appraisal Report will be taken into account in the next stages of the Traveller Local Plan preparation process.

**7.8** As the Traveller Local Plan is drafted, it will be subject to the later stages of the IIA using the IIA framework presented in **Chapter 5**. A full IIA report (incorporating the later stages of the IIA process) will then be produced and made available to other stakeholders and the general public.

LUC

July 2023