



Enfield RoadWatch Response to the Regulation 18 Traveller Local Plan Consultation

Enfield RoadWatch Response to the Regulation 18 Traveller Local Plan Consultation

25 October, 2024

Submitted by email to: travellerlocalplan@enfield.gov.uk

This response is provided on behalf of Enfield RoadWatch

NEED AND PROPOSED PROVISION

The needs assessment forecasts that Enfield will require 30 permanent Gypsy and Traveller pitches, as well as a transit pitch to accommodate at least 15 caravans simultaneously, during the plan-period i.e. up to 2041.

Eleven sites within Enfield were considered, from which five have been selected as preferred sites in the Regulation 18 TLP.

The LPA suggests these five sites can deliver a combined total in excess of 52 permanent pitches, considerably more than the 30 needed.

Question 1: Do you support the proposed site allocations, and the approach to potential pitch delivery at Chase Park and Crews Hill, as set out in Policy TLP-1? Please mention the site allocation you're commenting on and explain your answer.

TLP-01 (Bulls Cross Nursery)

No, we do not support this allocation because of its impact on the Forty Hall Conservation Area. Although the site is at present relatively well screened by deciduous trees and there are currently railings that fit the character of the Conservation Area, the site's adaptation for use as a Traveller site could well result in the removal of both. The generic wording in draft Policy TLP2: Design and Site Layout would not provide enough protection for this part of the Conservation Area and therefore site-specific policy protections would have to be applied.

TLP-03 (Land Adjacent to the Ridgeway)



Enfield RoadWatch Response to the Regulation 18 Traveller Local Plan Consultation

The site is in the Green Belt and the designated Area of Special Character (DMD84). Exceptional circumstances are required to justify its use for traveller pitches, which are unlikely to be justified because there is capacity available at other sites.

In addition, Enfield RoadWatch objects to the allocation of this site, which, sitting on high ground, can be seen from long distances and forms part of the green gateway into the borough.

Ingress and egress would be problematic as that section of The Ridgeway is busy and fast. This would create increased highway safety issues in an area known for crashes. Mitigating this issue would require infrastructure investment which could then cause traffic flow problems on The Ridgeway.

Importantly, the site is not in a sustainable area, being isolated with little access to public transport and no amenities, such as schools, GPs or shops, nearby. This would increase car use from the site.

TLP-09 (Land at A10)

We object to this allocation, which is a small area that forms part of the A10 Edmonton Skate Park. It is proposed as a transit site with capacity for 12-18 caravans.

We note that the skate park is well used and would be negatively impacted by the proposed change of use. In particular, the increase in traffic entering and leaving the site would create a safety issue for skate park users, most of whom are young.

Increased traffic, including large caravans, leaving and entering the A10 could also cause issues on the A10, which is a busy major road with high accident rates.

The site users would be subject to considerable noise and pollution throughout the day and night because of its proximity to the A10.

Additionally, the site forms parts of a wider area of designated Metropolitan Open Land.

TLP-10 (Chase Park)

The proposals for PL10 as a whole are unsound and not consistent with the London Plan. Reasons for this are set out in our response to the Regulation 19 Local Plan consultation.



Enfield RoadWatch Response to the Regulation 18 Traveller Local Plan Consultation

Specifically responding to the TLP Consultation, the TLP says permanent pitches could be provided within two of the placemaking areas: Crews Hill (PL11) and Chase Park (PL10). However, the location of the pitches within these large sites is not specified so the site allocations cannot be adequately assessed.

It must be noted that Traveller sites are not included in the outline plans for PL10 Chase Park or accounted for within the Whole Plan Viability Update (2023) and that the landowner of Chase Park (PL10) has not agreed to accommodate traveller pitches. This Traveller site is dependent on the proposed PL10 development happening. All this casts doubt over the location's deliverability as a Traveller site.

We therefore suggest Chase Park be removed as a potential site.

TLP-11 (Crews Hill)

The TLP says permanent pitches could be provided within two of the placemaking areas: Crews Hill (PL11) and Chase Park (PL10). However, the location of the pitches within these large sites is not specified so the site allocations cannot be adequately assessed.

Given that the Council owns land within the Crews Hill placemaking area, much of which is not dependent on the rest of the area being developed, it is surprising that locations for traveller pitches have not been identified in advance of the consultation. Some sites would probably be met with little opposition.

As it is, we have to object to this site allocation because the PL11 proposals for development in open countryside are unsound and not consistent with the London Plan for the reasons set out in our Regulation 19 consultation response.

Question 2: If you do not support the proposed approach taken in Policy TLP-1, what alternative approach and/ or alternative sites would you suggest to help meet Traveller needs?

We question why Gypsy and Traveller accommodation needs were not addressed through the main Local Plan currently at examination. Addressing the matter in a separate DPD is not justified and closes off potentially suitable alternative sites which might arise during the examination process.



Enfield RoadWatch Response to the Regulation 18 Traveller Local Plan Consultation

We also question why the authority has proposed traveller pitches at two of the three main strategic sites proposed in the Regulation 19 Local Plan 2019-2041 - Crews Hill and Chase Park – but not Meridian Water. The Council has considerable control over when and where a traveller site could be delivered at Meridian Water, which is, unlike Crews Hill and Chase Park, close to the strategic road and public transport networks and close to existing and proposed amenities.

We therefore suggest land at Meridian Water be considered as a location for permanent pitches and/or a permanent or temporary transit site.

In addition, there are other large sites in the draft Local Plan that could accommodate Traveller sites. For instance, Southbury [PL2], a placemaking area, with large brownfield sites, close to the road network, public transport and amenities, should be included.

The council owns a lot of sites, including land in Brimsdown that should also be included for the same reasons.

We consider Policy TLP2: Design and Site Layout to be too generic to apply to all the proposed traveller site allocations. A single generic policy approach is unlikely to be justified or effective or consistent with national policy. Site specific policy requirements are necessary, particularly in the case of sites where there are landscape and heritage sensitivities.

Submitted by Ian D'Souza

Chair

Enfield RoadWatch

End.