



**PUBLIC CONSULTATION PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) TRAVELLER LOCAL PLAN (REGULATION 18 - PART 2) FOR ENFIELD**

**Friends of Firs Farm**

**Objection to the Enfield Draft Traveller Local Plan: November 2024 Prepared by Chris Ferrary BA, BTP, MSc (Trustee)**

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## **Introduction**

The Friends of Firs Farm (FOFF) (Registered Charity No. 1177069) has the objective to provide or assist in the provision of facilities for recreation and other leisure time occupation in the interests of social welfare with the object of improving the conditions of life of the public in North London/Enfield by supporting the preservation, promotion and improvement of Firs Farm wetlands park and playing fields.

We wish to object to the proposed Traveller Transit Site near Firs Farm. As a vital community hub, Firs Farm provides wetlands, sports facilities, and volunteer spaces that benefit both local residents and visitors. It is essential that we safeguard the area and ensure it remains a safe and welcoming environment, while also supporting the Council's efforts to meet its obligations.

In responding to the current statutory consultation on the Council's draft Traveller Local Plan, we first set out our understanding of the planning context. We then turn to set out our objections to the specific proposal to locate a Transit Site adjacent to Firs Farm Wetlands, and why we believe this proposal should not be included in the Plan to be adopted by the Council.

In summary, FOFF's basis for objection to this proposal are:

- The site is designated as Metropolitan Open Land (MOL), and this proposed use is contrary to the policies set out in the London Plan and the New Enfield Local Plan.
- The site proposed is inadequate for the number of caravans which the Council indicates that it is intended to accommodate.
- The access to the proposed site is unsafe because of its location on the Great Cambridge Road (A10) and its proximity to the nearby signalled junction and bus stop.



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- The location of the site on the A10, and the noise and air pollution resulting from this makes it an unsuitable site for a residential location for Travellers, as it may have an adverse effect on their health.
- The proposed Transit Site is in close proximity to the vulnerable ecosystems of Firs Farm Wetlands. We believe that the proposal is likely to have an adverse impact on this fragile environment, and potential will cause irreparable damage to this important local resource.
- The proposal will adversely affect existing commercial activities at Firs Farm and the surrounding areas, and may lead to a reduction in the facilities and amenities available to the local community.

### Planning Context

The **“Consultation on a New Plan for Enfield 2017-2032”**, published by Enfield Council in November 2015, made no specific reference to needs of or provisions for the Gypsy or Traveller communities.

The **“Enfield: Towards a New Local Plan 2036 - Issues and Options”** document was published for consultation in December 2018. This set out in its H8 Draft policy approach: Gypsy and traveller accommodation that:

*‘The Council will give careful consideration to the needs of gypsies and travellers. We will achieve this by:*

*a) Supporting appropriate accommodation where it meets an identified need as evidenced in the Council’s up-to-date housing need assessment and ensure requirements are planned for accordingly.*

*b) Ensuring development fully satisfies the criteria in this draft policy; and*

*c) Working in partnership with the Council’s Housing Department;*

*Development of any additional temporary or permanent Gypsy and Traveller accommodation will be supported where:*

- *The site is suitable for residential development and has good access to services and facilities to meet the needs of residents;*
- *Development does not have a detrimental impact on the natural environment;*
- *Development does not have a detrimental impact on the amenity of neighbouring and nearby residents and businesses; and*
- *The site is located in Flood Zone 1 or exceptionally in Flood Zone 2, and is otherwise suitable for development.”*



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The *“Enfield Local Plan: Main Issues and Preferred Approaches”* was published by the Council for consultation in June 2021. This further stated Draft Policy DM H10: Gypsy and Traveller accommodation that:

- “1. The Council will address the need for Gypsy and Traveller accommodation through the proposed Gypsy and Traveller Local Plan.*
- 2. Proposals brought forward for transit and permanent pitches over will be required to demonstrate the following:*
  - a. the site is in an area suitable for residential occupation and suitably connected by sustainable modes of transport with health care, retail and school facilities with capacity;*
  - b. the impact of the development would not harm the landscape, heritage assets, biodiversity or visual character and amenity of the area, particularly the green belt;*
  - c. the site is suitable where required for the undertaking of occupants’ employment and entrepreneurial activities without detriment to adjacent occupiers’ amenity;*
  - d. the site can be safely accessed by pedestrians, vehicles and caravans;*
  - e. be laid out and incorporate boundary treatments that seek to positively integrate with the adjacent townscape/ communities; and*
  - f. adequate on-site utilities, including water resources and supply, waste disposal and treatment, are provided for the benefit of residents and in order to avoid adverse impacts on the natural environment.*
- 3. Due to the nature of this housing need, there will be continuing cooperation with neighbouring local planning authorities to ensure that the appropriate demand is identified and provision made.”*

Paragraph 8.10.1 of this consultation document also noted that a separate Local Plan was being developed to focus on the needs of Gypsies and Travellers, which would be informed by the Gypsy and Traveller’s Accommodation Assessment (GTAA) 2020 to identify the need of 21 pitches over the plan period.

Table 8.5 of the document identified the Council’s preferred policy option was meet the needs of the Gypsy and Traveller accommodation through the proposed Gypsy and Traveller Local Plan. This, they believed, would positively plan and manage development to meet the needs for this group of the community. This would be informed by the Gypsy and Traveller’s Accommodation Needs Assessment (GTANA) 2020, which identifies a need of 21 pitches over the plan period.

Following this, in September 2023, Enfield Council published it’s *“Traveller Local Plan (TLP), Issues and Options (Regulation 18)”* Consultation document. This noted again that the GTANA published in October 2020 found that the overall need for Traveller sites in the borough is for 23 pitches. Provision of a transit site/stop over site for 6 pitches was also



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recommended (to accommodate up to 12 caravans at one time). However, as an Issues and Options consultation, this document did not at this stage identify specific sites for the main Gypsy or Traveller site, or the Transit site.

The consultation document did note (p22) that the transit site provides for the needs of Gypsies and Travellers who are on the move and may be used for a few days or a few weeks at a time. It should not provide permanent accommodation although there is a danger of this happening if there is a shortage of permanent sites. A transit site may require a resident site manager to ensure that the site is used correctly. It needs to have the same services as a permanent site and would therefore need land drainage, sewerage, water supply, electricity, refuse collection, utility buildings, and safe access onto a metalled road. Electricity can be provided on a metered basis. This would leave the Council with the cost of setting up and equipping the site and thereafter maintaining it and possibly paying for water and refuse collection which could be reimbursed by charging a usage fee.

Subsequently, London Borough of Enfield's "**New Local Plan 2019-2041**" published under Regulation 19 for consultation in March 2024, states at **Policy H10: Traveller Accommodation**:

*"1. The Council will meet the identified need of at least 21 pitches over the plan period, for Traveller accommodation through the Traveller Local Plan.*

*2. Proposals for both transit and permanent provision including plots for Travelling Showpeople, will be required to demonstrate the following:*

*Location and connectivity*

- a. the site is in an area suitable for residential occupation and is well connected by sustainable modes of transport;*
- b. the site provides convenient access to health care, retail and education school facilities with available capacity;*

*Impact on environment and heritage*

- c. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;*

*Occupational suitability*

- d. the site is suitable where required for the undertaking of occupants' employment and entrepreneurial activities without detriment to adjacent occupiers' amenity;*

*Safe access*

- e. the site can be safely accessed by pedestrians, caravans and other vehicles;*  
*Integration with surrounding area*



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*f. the layout and boundary treatments of the development aim positively integrate with the adjacent townscape/communities; and*

*On site utility provision*

*g. The development ensures the availability of on-site utilities, including water resources and supply, waste disposal, and treatment. These utilities are provided for the benefit of residents while avoiding adverse impacts on the natural environment.*

*3. Due to the nature of this housing need, the Council will maintain continuing cooperation with neighbouring local planning authorities to identify the appropriate need and facilitate necessary provision.”*

Most recently, the **“Traveller Local Plan (TLP) Draft Plan”** was published under Regulation 18 for consultation in September 2024. This reported (p.9) that a comprehensive internal review by Enfield Council’s Property Services had identified nine council-owned sites that have been put forward and assessed specifically for Gypsy and Traveller provision. This includes Land adjacent to the A10, currently used as a Skate Park (N21 2PS) (see para 18-19).

## **FOFF’s response to the Draft Traveller Plan Proposals**

While we understand the Council’s responsibility to provide sites for the traveller community, including transit sites, we would like to express concerns regarding the potential impact this proposal could have on Firs Farm and the surrounding community, based on previous experiences.

The Trustees of FOFF believe that the proposal for the Traveller Transit site set set out in the current consultation document issued by the council (as shown in Site Allocation Proforma – TLP\_09 in Appendix D to the document) should not be taken forward in the final version of the Plan to be adopted. The reasons for this are:

- 1. The site is designated as Metropolitan Open Land (MOL), and this proposed use is contrary to the policies set out in the London Plan and the New Enfield Local Plan.**

The proposed site is designated as MOL, forming part of a wider area encompassing Firs Farm Park and Wetlands, Edmonton Cemetery and Church Street Recreation Ground.

Policy G3 of the **Greater London Plan** regarding MOL affords this the same status and level of protection as Green Belt, and this is therefore protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. It also notes that London borough councils should work with partners to enhance the quality and range of uses of MOL. A transit site for Travellers is not specifically identified in the **National Planning Policy Framework** (NPPF) or the London Plan as a use that is appropriate on MOL.



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Enfield Council has also failed to demonstrate that this proposal would constitute the very special circumstances necessary for this proposal to be identified in the Local Plan and/or granted planning consent.

*Policy BG1 of the New Local Plan also states that “Proposals will be expected to contribute to the creation of a more integrated, multi-functional and accessible blue and green infrastructure network... This will be achieved through... protecting and enhancing areas of... Metropolitan Open Land to maintain their function, quality and Openness”. Policy BG5 of the New Plan states further that “Inappropriate development within ... Metropolitan Open Land will not be permitted”.*

On this basis, we believe that the proposal for the Transit site at this location is inappropriate, contrary to planning policy, and should not be taken forward into the final version of the Traveller Local Plan.

**2. The site proposed is inadequate for the number of caravans which the Council indicates that it is intended to accommodate.**

The area of the proposed Transit Site is reported as 0.72 ha. This is stated to be able to accommodate 6 traveller pitches, which in turn could accommodate between 12 and 18 caravans supposedly based on the Council’s **“Gypsy and Traveller Site Selection Methodology (SSM)”**, updated September 2023. This document, however, states (p.11) that for transit pitches, each individual pitch needs to contain space for two touring caravans only together with two car parking spaces. This contradicts the proposed capacity of 2-3 caravans per pitch indicated in the Traveller Plan document, and also takes no account of the need to accommodate larger trucks which travellers typically use to tow caravans and/or for activities associated with the businesses in which they engage. Together with the other requirements for onsite facilities and amenities, which are the same for Transit sites as for Permanent sites, we believe there is insufficient space to meet all these requirements. Unfortunately, we believe that this may lead to overcrowding at the site, and increase the difficulty of effectively managing the site for the benefit of Travellers and to minimise the effect on the local community more generally.

**3. The access to the proposed site is unsafe because of its location on the Great Cambridge Road (A10) and its proximity to the nearby signalled junction and bus stop.**

Access to the proposed Transit site is presumed to utilise the existing dropped kerb access from the A10, which is a dual carriageway road. As part of the Transport for London Road Network (TLRN), management of this road is the responsibility of Transport for London (TfL). The access is located only 50m from the junction of the A10 and Church Street, which is a signalled junction. It is also adjacent to a bus stop, where the 217, 231 and 617 services run northwards to Enfield Town or Waltham Cross.



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In published advice on access to residential sites, TfL states clearly that it is likely to object to accesses on dual carriageways or where the speed limit is 40mph or more on safety grounds, which is the case here. TfL also notes that it is likely to object where use of the crossover would interfere with, or be hazardous to, bus movements or a bus stop, which again is the case. This is presumably why the car parking spaces on the proposed site at present are not in use, and the gate across the access is chained shut.

Given that the use of the proposed Transit site would require access at all times, and would involve manoeuvring of large trucks often towing caravans in and out of the site, the high speeds of traffic on the A10, proximity to the nearby signalled junction and the adjacent bus stop, we believe that this proposal is unacceptable in road safety terms, and therefore should not be taken forward in the final version of the Traveller Local Plan.

**4. The location of the site on the A10, and the noise and air pollution resulting from this makes it an unsuitable site for a residential location for Travellers, as it may have an adverse effect on their health.**

Environmental conditions at the proposed Transit site are poor. Enfield Council's most recent ***Air Quality Annual Status Report***, published 17/06/2024 indicates that, together with Church Street in Enfield Town Centre, the nearby monitoring position on the A10 has consistently failed to meet the UK Air Quality Standard for nitrogen dioxide (NO<sub>2</sub>) over a number of years. Similarly, according to the baseline chapter of the ***"Draft Transport Plan 2019 and Local Implementation Plan Strategic Environmental Assessment – Environmental Report"***, the main areas affected by traffic noise in Enfield are along the main traffic routes through the Borough, in particular areas close the A10. Providing residential accommodation for Travellers at the Transit Site, albeit temporarily, is contrary to Enfield's New Local Plan policies to *"protect the amenity of occupiers of existing and proposed homes in terms of ... Noise"* and in an area of poor air quality. Policy TLP2 of the Local Traveller Plan requires that sites *"must embed noise mitigation measures into the site design"*, which we do not believe will be possible give the constricted nature of the site.

The **Integrated Impact Assessment** published alongside the draft Traveller Local Plan does not identify these issues in the Health Impact Assessment reported and is therefore deficient in this respect.

Because of the potential adverse health impacts of the proposal for the Traveller community, we believe that this proposal should not be taken forward in the final version of the Traveller Local Plan.

**5. The proposed Transit Site is in close proximity to the vulnerable ecosystems of Firs Farm Wetlands. We believe that the proposal is likely to have an adverse impact on this fragile environment, and potential will cause irreparable damage to this important local resource.**



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Firs Farm is vitally important community resource. It provides a “green lung’ for the surrounding residential areas, with many opportunities for informal recreation and organised sports. The wetlands have an important role in flood alleviation in the area, allowing pluvial flooding to be avoided, particularly in the context of increasing areas of hard-standing from new development and paving front gardens, which has led to increased run-off during extreme weather events and an increased risk of flash flooding. The area also is important in maintaining and improving local biodiversity, and the award-winning wetlands are home to many species of animals, birds and insects. The area now provides an important educational resource for children through the activities of schools and other community groups.

FOFF works tirelessly alongside Enfield Council, the Environment Agency, Thames Water, Sport England and a range of other partners to maintain and improve the quality of Firs Farm and increase its value to the local community.

It is unfortunate, but on several previous occasions in recent years parts of Firs Farms have been occupied by travellers. On these occasions, the area has suffered significant damage, including fly-tipping, contamination of the water, and general degradation of the area. This not only harmed the local environment but also deterred visitors due to aggressive behaviour, which severely affected the wellbeing of the community and the safety of the site. The close proximity of the proposed transit site raises concerns about the preservation of Firs Farm’s facilities, which are crucial for the local community. Should the site lead to similar disturbances as previously experienced, it would present a direct threat to the safety of the area, local residents, and visitors. We do not believe that the Transit Site proposal at this location should proceed on this basis.

**6. The proposal will adversely affect existing commercial activities at Firs Farm and the surrounding areas and may lead to a reduction in the facilities and amenities available to the local community.**

The proposed Transit site will be located directly adjacent to the A10 Skatepark, which is a valuable local recreational facility. It is well used and very popular with those who use it and their parents. FOFF is very supportive of this facility, as it aligns well with our charity objectives. The Skatepark provides a Safe Training Environment and we understand that the group managing the facility is aiming to play a pivotal role in youth development and physical activity, providing a safe space for children to train, and Enfield Council is providing financial support for teaching at the facility. The Skatepark group aims to nurture future talent, with aspirations to train young people for Olympic-level competition. The location of the transit site so close to the skatepark risks compromising the safety and success of this initiative.





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More broadly, FOFF has a direct interest in the Firs Farm Community Hub, which we own. The Hub is managed on our behalf on a commercial basis, and the community activities and Leon's Café at the Hub provides income for the charity to support our work for the community and the environment. We fear that the proximity of the Transit site may deter people from using the area generally and the Community Hub in particular. This in turn would have an impact on the returns from the Hub and the charity's ability to continue its work. We are also concerned that the Tennis courts in Firs Lane operated by PH Tennis may be similarly affected.

Overall, we believe that the location of the Transit Site near to Firs Farm will have a significantly detrimental effect on the facilities offered there, with a consequent adverse effect on local communities in a number of ways. We therefore believe that the proposal for the Transit site at this location should not be taken forward in the final version of the Traveller Local Plan.

## Conclusions

FOFF's primary objective is to ensure that Firs Farm continues to serve the community as a safe and thriving space for residents, visitors, and young athletes alike.

FOFF is committed to working with the Council to explore solutions that address the needs of the traveller community whilst ensuring that Firs Farm and its residents are safeguarded. On this basis, we ask that the proposed Transit Site on the A10 is not taken forward in the Final Travellers Local Plan to be adopted by the Council. Failing this, we would welcome discussions on how the impact of a transit site could be mitigated, whether through enhanced security, stricter management of the site, or measures to protect community spaces such as the Skatepark, the Wetlands and the Community Hub.

4<sup>th</sup> November 2024