

---

**Sent:** 21 September 2021 13:28  
**To:** LocalPlan <LocalPlan@Enfield.gov.uk>  
**Subject:** FW: Draft Local Plan

Dear Strategic Planning and Design Team,

I thought I sent through Sport England's comments to the Draft Local Plan on 10<sup>th</sup> September but I mistyped the email address and I only received the delivery failure last Tuesday (see attached). Unfortunately I have only returned to work after leave today so I am only just aware of this. I apologise for the delay but please find Sport England's comments below.

Kind Regards

**Mark Furnish** Planning Manager **T:** 020 7273 1631 **M:** 07920560435

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

---

**Sent:** 10 September 2021 11:55

**Subject:** Draft Local Plan

Dear Strategic Planning and Design Team,

#### **ENFIELD LOCAL PLAN – MAIN ISSUES AND PREFERRED APPROACHES**

Thank you for consulting Sport England on the draft document. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national and local policy as well as supporting Local Authorities in developing their evidence base for sport.

Sport England aims to ensure positive planning for sport by enabling the right facilities to be provided in the right places based on robust and up-to-date assessments of need for all levels of sport and for all sectors of the community. To achieve this aim our planning objectives are to PROTECT sports facilities from loss as a result of redevelopment, ENHANCE existing facilities through improving their quality, accessibility and management and to PROVIDE new facilities that are fit for purpose and meet demands for participation now and in the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found via the following link:

<https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/>

Sport England has reviewed the draft in light of these planning objectives and national planning policy set out in the National Planning Policy Framework (NPPF) and does not consider that the draft complies with this policy framework. Sport England therefore does not consider the document to be sound and objects to the draft. These objections, and some other comments, relating to the document are detailed below:

## Evidence Base

The National Planning Policy Framework (NPPF) requires each Local Planning Authority to produce a Local Plan for its area that should be based on an adequate, up-to-date and relevant evidence base. Paragraph 98 requires that:

*“Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”*

Sport England consider that specific policies relating to indoor and outdoor sport facilities, including playing fields, should be included within the Draft Local Plan and these should be based on a robust and up-to-date evidence base, such as the Playing Pitch Strategy (PPS) and indoor/built sport facility strategy, that would steer which types of indoor and outdoor sports facilities need protecting, enhancing and where new facilities, if any, are needed to meet current demand and the demand from future growth. These strategies would provide a clear strategy and action plan with delivery priorities for playing pitches and built sport facilities within the borough and therefore should direct the objectives and policies of the Draft Local Plan. Sport England is aware that the Council have a Playing Pitch Strategy but this has not been updated/reviewed annually since its completion in 2018 so could shortly be considered out-of-date. Sport England is also unaware if a robust indoor/built sport facility strategy has been developed to inform the Local Plan.

Notwithstanding the above, the PPS is not included within the list of evidence base documents stated to inform the Local Plan, although Sport England does appreciate that there are some references to the PPS in the draft and that some elements have been referred to in the Blue and Green Infrastructure Strategy. The Local Plan also appears to suggest different recommendations/actions than what appears in the Draft Local Plan, particularly in relation to identifying a hierarchy of sporting hubs, including sites that do not appear in the PPS, such as the Tottenham Hotspur Training Ground and allocating sites for development that the PPS clearly seeks to protect and enhance, such as the Church Street Recreation Ground. As a result, Sport England has no alternative than to consider that the policies that relate to sport facilities are not informed/justified by robust and up-to-date strategies therefore consider that the policies are not sound at this point in time. Sport England, therefore, strongly recommend that the Council, at least, undertake an review of the PPS and develop an indoor/built facility strategy to inform the Local Plan to ensure that the next draft (Regulation 19) is in sound.

## Active Design

Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements of the Draft Local Plan. Active Design is also mentioned specifically in Strategic Policy SP SC1 which is supported by Sport England.

Sport England recommend, however, that the links between the proposed draft and Active Design can be developed and strengthened, especially given the Council's intention to improve the health and wellbeing of the borough's population. In this respect Sport England have the following comments in relation to Active Design that could be considered:

- Vision - Table 2.1 mentions the Strategic Objectives with Strategic Objective 2 seeking to reduce health inequalities and seeking to use good design to create walkable connected communities and supporting active and socially connected lives. This is important to reduce inactivity and encourage movement however improving health does not solely rely on walkable communities. For instance, Strategic Objective 5 seeks to deliver a liveable, inclusive and a connective network public realm and Strategic Objective 11 seeks to protect Green Belt, MOL and open spaces. These fall within the principles of Active Design therefore linking the principles within the Objectives could be of some benefit to help achieve these strategic aims
- Strategic Policy SP SS2 – Sport England welcome that the policy seeks large scale developments to create healthy places which promote active and healthy lifestyles however to fully embed healthy design Sport England recommend that this is amended to encourage all developments to be designed with consideration to the Active Design Principles.
- Places – Chapter 3 sets out growth that would be directed throughout the borough with specific visions and policies relating to key placemaking areas. Each of the placemaking policies mention one or more principles of Active Design, most notably Active Travel, but Sport England considers that the policies could

go further by fully embedding all the principles within the placemaking policies so that these areas are designed with health and activity at the forefront.

- As noted above, Strategic Policy SP SC1, which seeks to improve the health and wellbeing of Enfield's diverse communities, does specifically state that proposals will be expected to incorporate Active Design principles. Sport England, however, recommend that the supporting text elaborates on the principles and provides links to the guidance to assist developers and planning officers. It would also recommend to fully embed the principles by requiring planning applications, in addition to Health Impact Assessments, to include a completed Active Design Checklist that demonstrates how the principles were incorporated within a proposals' design.
- Strategic Policy SP DE1, or within the supporting text (for example paragraph 7.1.2), could also include reference to incorporating the Active Design Principles within proposals so that developers are aware of requirements of Strategic Policy SP SC1.

More information on Active Design, including the guidance, checklist and a model Active Design policy can be found via the following link;

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

### Key Spatial Issues

Since the PPS identifies deficits that needs addressing to meet current and future needs and that there is a focus throughout the Draft Local Plan to improve the health and wellbeing of the borough's population, Sport England questions why ensuring there is sufficient sport facilities to meet local need is not a specified issue.

### Vision

Sport England welcome that Strategic Objective 18 states that sports facilities would be protected and new homes should be supported by high quality sports facilities although facilities should be protected and provided based on current and future identified needs set out in a robust and relevant sport facility strategy/strategies. The Objective's stance partly aligns to Sport England's policy however this should be extended to include enhancing existing facilities since the best option to accommodate the impact of local growth could be improvements/expansion of existing facilities.

### Draft Strategic Policy SP SS2

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment. As a result, Sport England support that the policy requires developments to contribute to social infrastructure, on the basis that social infrastructure includes sports and recreation facility provision.

### 3. Places

In addition to the comments relating to Active Design above, Sport England has some concern that, with the exception of the placemaking vision/policies relating to Angel Edmonton, Meridian Water, New Southgate, Rural Enfield and Crews Hill, there is no reference to the need to enhance or provide sports facilities to meet current deficits or address future strategically identified need. As noted above, there is considerable growth proposed and it's likely that this would detrimentally affect the availability and quality of sports facilities if not fully mitigated. This illustrates the importance of having up-to-date and robust Playing Pitch and Built/Indoor Sport Facility Strategies that informs the Local Plan. It also raises questions, again as highlighted above, as to whether the Local Plan was based on the PPS and any other sport facility strategy that the Council has developed.

Sport England also has concerns with the areas where sports facilities were referred to as follows:

- Angel Edmonton Vision mentions the provision of new sports and recreation facilities but Strategic Policy SP PL4 appears silent on sport and recreation facilities therefore would the policy be sufficient to achieve the vision? In addition, as noted above, Sport England considers that the vision/policy makes clear that any new/improved sport facility provision should be directed by the Council's robust sport facility strategy/strategies.
- Meridian Water supporting paragraph 3.5.11 states that appropriately located sports facilities can provide

invaluable social space for older children and teenagers, help to alleviate antisocial behaviour, reduce levels of crime and can enrich the urban landscape. Sport facilities would not just benefit older children and teenagers but the whole community by providing facilities that enable them to engage in sport and physical activity. Sport England suggests that this paragraph is re-considered so it indicates that sport facilities are inclusive and benefits the whole of the community.

- Strategic Policy SP PL7, relating to New Southgate, states that Arnos Pool has been identified as a facility that needs improving however Sport England is not clear how this has been identified, i.e. has it been identified that enhancements are need to accommodate a certain degree of growth? What improvements are required? etc.
- Rural Enfield placemaking vision and Strategic Policy SP PL8 encourages world class sporting facilities and cites sports such as wild swimming and mountain biking. Sport England support these aspects of the vision and policy as providing a range of sporting facilities/activities is important to allow communities various options to be active. Sport England, however, question the need for sporting hub at Tottenham Hotspur's Training Ground as this is not mentioned and, therefore, not strategically assessed, in the PPS (assuming that natural or artificial football pitches are proposed at the site). This again raises questions whether the PPS has informed the Local Plan and the requirement for a sports facility in location would be difficult to justify without it being strategically identified as required to meet existing or future local sporting needs in the PPS.

#### 5. Addressing equality and improving health and wellbeing

Sport England support the stance of Strategic Policy SP SC2 as it has some parallels with Sport England Policy and the NPPF however there are some elements that Sport England consider need amending to ensure that the policy fully aligns with national policy and, therefore, could be considered sound. These are as follows:

- Sport England is not clear if all the criteria in 1. would need to be satisfied for any loss or just one of the elements. If the latter, Sport England would object as only 1. b. would align with the NPPF, paragraph 99, and Sport England Policy. Sport England also notes that the NPPF, paragraph 99, also does accept the loss of sports facilities if it is caused by another sport facility the benefits of which outweigh the harm caused by the loss.
- 1. b. should indicate that any replacement provision should be of, at least, equivalent quantity, quality and accessibility for it to align with the NPPF, paragraph 99, and Sport England Policy.
- The policy would also appear to accept the loss of a sports facility to another community use, i.e. a gymnasium changing to place of worship, which Sport England would object to as a result it is recommend that the policy is amended to ensure that the type/function of the community use is retained/protected.
- Although it is likely that new sports facility are needed in designed centres as sought by 2. a. this not always the case/appropriate, for instance new playing field/artificial grass pitches location should be based on meeting identified local defects/needs that may not be in a centre or it could be inappropriate to put such a facility within a centre. Sport England also notes that the policy would appear to be at odds with the sporting hub at Tottenham Hotspur's training ground that appears to be outside an designated centre within the Draft Local Plan.
- Sport England is also concerned with 2. d. as often sports uses can effectively occupy unused employment buildings, for example gymnastic/climbing walls have used old industrial/warehouse buildings in the past.
- The policy does not mention that any new facilities should meet identified current or future local need.
- As highlighted above, additional homes generate greater demand for sport and recreation facilities that might not be able to be accommodated at existing facilities as a result Sport England questions why 3. and 4. do not seek contributions towards improving existing or new sport facilities.

Sport England also notes that paragraph 5.2.1 does not list sport and recreation facilities as a community facility, Sport England would like to clarify whether this an oversight or whether it is not intended that the policies within this section would apply to sport and recreation facilities, given that there is welcomed reference to Sport England guidance in paragraph 5.2.6 Sport England assumes that it is the former.

#### 6. Blue and Green Enfield

Parks and open spaces are often playing fields and sport is often undertaken on blue infrastructure therefore Sport England support the protection and enhancement stance in Draft Strategic Policy SP BG1, particularly in relation to a sites' function as this should prevent, for example, playing field being lost to more general open space. Sport

England, however, would like to highlight that private playing fields have an important role for the delivery of sport therefore these should have similar protection. It should be noted that the NPPF, paragraph 99 in particular, does not distinguish between public and private playing fields and sports facilities.

In addition, Draft Strategic Policy SP BG1 1. h. seeks to create and increase publicly accessible open space and outdoor sports, including playing pitches and ancillary sporting facilities, particularly in locations which experience the highest level of deficiency. Sport England support this stance and would like to highlight that the PPS would be able to direct what facilities/pitches are required and where. In relation to 2. b, the sport villages, and the facilities within them, should be informed by the PPS and other sport facility strategies to ensure that they meet identified needs. Although both Firs Farm and Enfield Playing Fields are mentioned as potential hub sites in the PPS, so could be argued the PPS steers towards a sports village of sorts, Hotspur Way is not.

Sport England recommends that Paragraph 6.1.2, which mentions shortfalls of playing pitches, could point to the PPS action plan (which although needs reviewing/updating) should provide a steer of what is required.

In relation to Draft Policy DM BG 6, Sport England welcomes that facilities to support the sporting use of a site would be accepted, although to ensure this requirement aligns with national and Sport England Policy this should be on all land, i.e. MOL, as well as open space. Although Sport England would like to highlight that temporary facilities should be avoided on playing field, to ensure the plan aligns with national and Sport England Policy and to ensure the site would be fit for purpose, the requirement of 1. b. to restore open space to its original purpose should also include the site to be restored to its existing quality as well. Part 1. d. of the policy seeks replacement open space but Sport England would like to highlight that the replacement should be of equivalent quantity as well as quality and accessibly and be the same function, i.e. if a playing field is lost a playing field must be the replacement and not merely just open space. This would ensure that the policy complies with Sport England Policy and the stance of the NPPF.

Sport England supports the content of Paragraph 6.6.3 but encourages that this requirement is expanded to ancillary facilities as well, for example a loss of a cricket pavilion would significantly compromise cricket played at a site.

Finally, Sport England welcomes that sport and recreation activities within or adjacent to watercourse would be supported in Policy DM BG7.

## 9. Economy

Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:

In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting (*\*Economic value of sport in England June 2013 published by Sport England*).

- Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England.

Sport also generates a range of wider benefits, both for individuals and society:

- The benefits of playing sport include the well-being/ happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering.
- Consumption of sport benefits include the well-being/ happiness of spectators, and the national pride/feel good factor through sporting success/achievement.
- The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health.

Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.

It is Sport England's contention that Council should consider sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications. When sports facilities are designed in as part of an employment part e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to. Furthermore, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms, or commercial football, e.g. Football First, or a gymnastics club, than a 500,000m<sup>2</sup> B8 use. It appears that Draft Strategic Policy SP E3 would potentially allow sports facilities although Draft Policy DM TC3, in the Town Centre and High Streets chapter, could prevent such uses above ground floors. Sport England would encourage that the stance in the latter is amended as sports facilities not only generates employment but also encourages the public to visit such areas throughout the evening and at weekends.

## 12. Culture, Leisure and Recreation

Sport England welcomes the inclusion of Draft Strategic Policy SP CL4 but does not consider that some elements of the policy comply with national or Sport England's policy as currently drafted. Sport England's concerns at this stage are as follows:

- Given that the Council have a PPS, and should consider developing a robust indoor/built sports facility strategy, should 1. seek to also contribute to the actions in the PPS and any other sports facility strategy?
- 1. b. states publicly accessible strategic sport and leisure facilities would be provided to meet the needs of the growing population would be based on a location hierarchy however this hierarchy is not discussed in the PPS and could result in certain facilities being located in these location that are not strategically identified as required in these location. As noted above, the PPS does not recommend facilities are required at Tottenham Hotspur's Training Facility and only certain improvements are cited at Enfield Playing Fields and Firs Farm. It appears, therefore, that this element of the policy has not been informed by the strategy/evidence base.
- Sport England have concerns with section 2. since it is not clear if the expansion of the Tottenham Hotspurs Training Centre would meet locally identified needs as explained above. In addition, if the expansion results in the loss of sports facilities then in order to meet the NPPF, paragraph 99, and Sport England Policy it must be robustly demonstrated that the facility that would be lost is either surplus in an assessment or replaced, especially since the PPS does not highlight a community need for the proposed facility at present. Please note that lack of use should not be seen as necessarily indicating an absence of need for a specific sports facility in the locality. Such land can retain the potential to provide to meet current or future needs.

Sport England support the stance of Draft Policy DM CL5 but does note there appears to be a focus more on open space however sport is also played indoors. This appears to be acknowledged in the supporting text at Paragraph 12.5.1 but Sport England recommends this is highlighted more in the policy. Sport England also recommends that to ensure consistency with Draft Strategic Policy SP BG1, Draft Policy DM CL5 should make clear that ancillary facilities would be accepted. In respect of 12., Sport England would recommend that an additional criterion is added that requires new artificial grass pitches to meet a demonstratable local community need. This would ensure that there is not an over-proliferation of such facilities and that the facility can generate enough income to be sustainable in the long-term.

Sport England do not support a standards approach advocated in Table 12.1 in relation to playing pitches as this does not fully reflect the nuance of sport needs. As a result, as suggested in paragraph 12.5.4, developments should be assessed on a case by case basis and any sport facility requirements should be based on needs/issues identified in sport facility strategies and pre-application discussions. Therefore, Sport England recommends that Table 12.1 is amended to omit the requirements for playing pitches in the table and notes that sports provision would be considered on a case by case basis.

### Draft Strategic Policy SP ENV1

Sport England supports the inclusions of the agent of change principle as this would protect sport sites, for example from new dwellings sited next to artificial grass pitches without sufficient mitigation against noise or on the edge of cricket sites without mitigation from ball strike. Sport England suggest that the latter example is considered to be mentioned in policy, potentially under hazard/health and safety section, as it is often overlooked by developers.

### Draft Strategic Policy SP D1

Having regard to the stance on health and wellbeing throughout the whole document, Sport England questions why sport and recreation facilities are not listed as a priority, especially since other policies in the Draft Local Plan

seeks developments to contribute to sport facilities.

### Site Allocations

Sport England objects to the following allocations as follows:

- SA 1: St Anne's Catholic High School for Girls, Enfield – The allocation indicates that open space shall be provided in line with national policy however it is a playing field that is on the site therefore in line with national, Sport England and the other policies within the Local Plan the playing field must be replaced to, at least, the same quality, quantity and accessibility as the existing site. This should be made clear in the allocation. Sport England is unclear if there are indoor sport facilities at the school, such as a sports hall, but if there are then these should be replaced to ensure this allocation aligns with policy.
- SA13: Edmonton Green Shopping Centre – Sport England objects to the application as it appears to advocate the loss of the leisure centre without it being replaced. As result, this would not meet NPPF, paragraph 99 and Sport England Policy.
- SA27: Land at Crews Hill – The allocation proposes the loss of golf course. This loss would need to be justified in line with NPPF, paragraph 99, which, at present it appears not to be. Although not overly clear, the allocation appears to be adjacent to a cricket club therefore any scheme should ensure a ball strike risk assessment is undertaken and the mitigation it suggests is implemented. This burden would be on any developer.
- SA28: Land at Chase Park – The equestrian land would need to be strategically identified as surplus or must be replaced to comply with national policy. This is not currently clear to Sport England whether this is the case.
- SA40: Brimsdown Sports Ground – The allocation suggests that there could potentially be the loss of playing field land and associated facilities. The PPS clearly states that this site should be protected as playing field in the Local Plan.
- SA57: Whitewebbs Golf Course – It is not clear if the golf course is surplus or would be replaced therefore since the allocation suggest its loss it appears this allocation is contrary to the NPPF, paragraph 99, and Sport England Policy.
- SA58: Alma Road Open Space – Historic aerial photographs indicate that there were playing pitches on this site therefore it falls within the definition of a playing field. It does not appear, therefore, that the requirements of the NPPF, paragraph 99, would be met at this stage.
- SA59: Firs Farm Recreation Ground – Again, the allocation seeks the loss of playing field which the PPS states requires protection.
- SA61: Church Street Recreation Ground – Loss of playing field is proposed. Again, the PPS seeks the Local Plan to protect the site and advocates improvements. In addition, Sport England, ECB, Football Foundation and the Council have been working together to install an artificial cricket wicket in this location as part of recent mitigation package for approved development at the adjacent Latymer School.
- SA62: Land at Tottenham Hotspurs Football Club Training Ground – As mentioned above, it is not clear as to the extent of any loss of community facilities but this would need to be replaced or robustly identified as surplus. Sport England would expect that the new facilities, if they are strategically identified as needed to meet demand, to be available for community use during the peak period of community use and this community use is secured by a Community Use Agreement.

Sport England would also like to highlight that in relation to SA56: Land at Picketts Lock, any new sports and leisure facilities should meet a strategically identified need.

Please note that Sport England would object to any land allocation that seeks the loss or reduction in sport facilities, including playing field, which does not align with Sport England's Planning Policies or the NPPF, particularly paragraph 99. If there are site allocations that seek to do this which are not identified above could the Council please highlight these to Sport England at this stage.

### Conclusion

Overall, Sport England has concerns that the Draft Local Plan as it does not appear to be informed by an adequate evidence base, does not appear to take into consideration or is informed by the PPS, it seeks new sporting developments that may not meet current or future needs/demand and advocates the loss of playing field and other sports facilities. As a result Sport England does not consider the Draft Local Plan is justified, effective,

meets national policy contained in the NPPF nor does it meet Sport England's Policies. Sport England, therefore, object to the Draft Local Plan and strongly recommend that the Council consider amendments the various elements highlighted above.

If you have any questions or would like any further advice please do not hesitate to contact Bob Sharples or myself.

---

