



Enfield Draft Local Plan,

I am writing to provide comments on the draft Local Plan, on behalf of Enfield Sport.

As you can see I have attached a number of detailed comments on various aspects of the Plan, which Enfield Sport would expect to see addressed in the final version of the document..

The attached comments reflect a number of concerns, but there is one concern that I would wish to highlight in this letter; which is the concern I have that the Plan does not confirm the Council's already agreed commitments to protecting sports facilities and playing fields, as set out in the Enfield Playing Fields Strategy.

As you will be aware, the Local Plan policies will take precedence over the Playing Pitch Strategy, when proposed developments are considered by the Planning Committee; so if the Playing Pitch Strategy commitments referred to above are not restated in the Local Plan then they are likely to be overridden or ignored.

In view of the above Enfield Sport would expect to see at least one very clear statement in the Plan that the commitments included in the Enfield Playing Pitch Strategy are confirmed as commitments in the Local Plan. I think that this is perfectly reasonable given that the Playing Pitch Strategy has been agreed by the Council and the Council must therefore be committed to its contents.

Can you please directly respond to this key issue and confirm whether the Council's Local Plan will confirm the commitments set out in the Enfield Playing Pitch Strategy.

yours sincerely

Enfield Local Plan

Detailed Comments on the draft Local Plan, submitted by Enfield Sport

	Plan Reference	Comments
1	1.6.1	<p>The importance of sport and culture needs to be recognised, by including the words "sport" and "culture" in the list of "messages" that are included in this paragraph.</p> <p>The 7th bullet point should be amended to state: "Ensuring easy access to health, education, training provision, sports and cultural facilities for all", or a new bullet point should be added, such as:</p> <p>"Ensuring access to sports and cultural facilities for all"</p> <p>This would be a simple way of stating the Council's commitment to sport and cultural facilities and remove any doubt that the Council is not committed to such facilities .</p>
2	1.11.2	<p>The words "sport and culture" should replace the word "leisure" and be included in the 6th bullet point in the paragraph..</p> <p>The reference to "Provide for new and improved open space and green and blue infrastructure" (9th bullet point) needs to be replaced by:</p> <p>"Protect existing open space, sports facilities and green and blue infrastructure; as well as providing new and improved open space, sports facilities and green and blue infrastructure, where opportunities arise".</p> <p>If the above change is not made the document will not have a clear commitment in paragraph 1.11.2 (an important paragraph) to protecting existing sports facilities and open space. Hence the need for the above amendment.</p>
3	1.11.2	<p>This paragraph should include an additional bullet point:</p> <p>"Supporting the voluntary sector, at a time when it is facing increasing financial pressures"</p> <p>as a challenge and in relation to the Council working in partnership to achieve strategic objectives. The Council cannot hope to achieve its strategic objectives if it doesn't work in partnership with the voluntary sector (providing a library service is just one example), so that should be recognised in para. 1.11.2.</p>

4	2.5	<p>In the draft Vision for Enfield, the section that sits under the heading "A Place for Diversity and Equality" should refer to sports and cultural facilities, in the final paragraph.</p> <p>The words "improvements to sports and cultural facilities" should be included in the relevant paragraph, as follows::</p> <p>"Residents will have improved health and wellbeing and quality of life, improvements to public spaces, improvements to sports and cultural facilities; as well as employment opportunities,".</p>
5	2.6	<p>In Objective 3 the reference to "manage open space deficiency" should be replaced by the words "address open space deficiencies, where opportunities arise".</p> <p>"Managing" open space deficiencies doesn't mean anything and conveys a sense that open space deficiency in certain areas of the borough will be allowed to continue.</p>
6	2.7.1	<p>This paragraph should also refer to residents having access to "sports and culture" .</p>
7	Map on page 62	<p>This Map should include reference to open space and playing fields that are protected by King George IV and QE2 Status, given there are covenants in place that provide protection to these sites.</p>
8	Figure 7.2 on page 130	<p>Given that there are proposals to develop a significant number of new houses / dwellings in Enfield Town, the "St Anne's School Playing Fields site" should be protected as open space and playing fields, to meet the needs of the increasing population living immediately in the vicinity of Enfield Town station. The Playing Fields should therefore not be identified as a development site.</p>
9	7.2.5	<p>The definition of what constitutes Healthy Town Centres needs to include reference to access to sport and culture facilities.</p>
10	7.2.9	<p>The Plan should include a commitment to altering the A1 Class designation, where appropriate and where opportunities arise to do so; so that sports, cultural and other uses can be facilitated. The vague references to new policies being needed are not strong enough.</p>
11	8.1.1	<p>The definition of "community facilities" needs to include reference to sports facilities.</p>
12	8.1.4	<p>The definition of "social infrastructure needs" needs to include reference to "Sport and cultural" facilities.</p>
13	8.1.9	<p>This paragraph provides the Council with the ability to move a community facility from its existing location, to another location in the borough. This should only happen where it has been demonstrated there is no longer a need for such a community facility, taking account of current and future</p>

		needs and where a replacement facility adequately serving the same community can be provided.
14	8.1.14	The weak reference to protecting "open space, sports and leisure facilities" needs strengthening. The best way of doing this is to include a clear commitment to supporting the commitments and levels of protection included in the Council's already agreed Playing Pitch Strategy.
15	Page 148, section 8.1.4.	<p>The section of the report that sits under the heading "Open Space, sports and leisure facilities, community halls and libraries" does not have any further analysis of sports provision in the borough (in the following two pages of the Plan.</p> <p>The paragraphs that describe the services that fall under the heading "Open Space ...etc" doesn't include any reference to sports facilities, including Council owned facilities and facilities run by the voluntary sports sector; or the wide range of sports development activities that happen in the borough.</p> <p>There is therefore a need to add in an extra paragraph about sports provision in the borough.</p>
16	Policy SI 1	<p>Section a) of the Policy needs to include reference to "sport".</p> <p>An additional section needs to be added in the Policy, after the existing section e), as follows:</p> <p>"e) Supporting the protection of sports facilities and playing fields, as set out in the Council's Playing Pitch Strategy".</p>
17	8.3.1	Whilst the value of sport is recognised, the following paragraphs (after 8.3.1) don't include any description of sports provision in the borough.
18	Policy SI 2	Paragraph h) within the policy is welcomed and provides further justification for increasing the profile of sport and recreation in the rest of the document.
19	8.3.5	The sentence "First and foremost, these facilities must be protected" is welcomed, although this aim should be extended to all sports facilities that protected in the Council's Playing Pitch Strategy".
20	Policy SI 3	The title of the Policy needs to include reference to "sport", not just "arts and cultural facilities"; given the whole chapter has been about a range of cultural activities, including sport.
21	Policy SI 3	The reference to "supporting the continued presence ofsport and recreation venues..." is a weak way of explaining the Council's ambition to protect such facilities. Instead, there should be a clear commitment to supporting the commitments and levels of protection included in the Council's already agreed Playing Pitch Strategy.
22	Policy SI 3	Section c) of the Policy is very worrying as it will allow the loss of facilities

	c)	<p>where there is evidence that they are not "economically viable". With the Council adopting a market based approach to providing sports and recreation facilities (income generation is now the main aim for Council managed cultural services); this could result in the loss of sports facilities that require a subsidy (eg swimming pools), even though subsidies can be justified because such facilities provide many other benefits to the local community (eg. improving quality of life, keeping people fit and active, promoting social cohesion, reducing crime and anti social behaviour, supporting economic regeneration etc etc). Some of these benefits result in reduced social care, NHS and Policing costs, which should also be considered alongside what appears to be a very limited and blunt way of assessing the economic value of such facilities.</p> <p>In view of the above, the reference to allowing facilities to close because they are not "economically viable" should be removed from the Policy.</p>
23	Page 160	<p>One of the circles on page 160 refers to "Any loss of sports provision should be justified and considered through the plan making process". This sentence should be amended to read:</p> <p>"Any proposed loss of sports provision should be considered in the light of commitments made to protect playing fields and sports facilities in the Council's Playing Pitch Strategy and resisted unless it can be shown there is no current or future demand for such facilities".</p> <p>If the above change is not made the Council is effectively encouraging proposals to come forward that will result in the loss of sports provision.</p>
24	9.2	<p>The reference to "local" needs to be taken out of the existing sentence "Protecting and enhancing local open space", to ensure that sites of a strategic, cross borough importance (eg Enfield Playing Fields and Firs Farm Playing Fields) are given the same level of protection as a local park. Again, a cross reference to the protection included in the Council's Playing Pitch Strategy would be appropriate.</p>
25	9.2.4	<p>The reference to "Sport and Recreation uses are an integral part of the borough infrastructure and contribute to the health and well-being of residents" is welcomed; but this doesn't stop the loss of specific sites. The above proposed references to the Enfield Playing Pitch Strategy will address this issue.</p>
26	9.2.7	<p>There is an important reference to "Enfield adopted its Playing Pitch Strategy for the period 2018-33..." in this paragraph; but, again, there is no reference to the Council being committed to the protection that is included in this document, even though it has been agreed by the Council. This needs addressing.</p>
27	Policy GI 1	<p>The opening comment in this Policy is welcomed, but section a) is too weak and vague, talking only of reviewing open space etc. Either this section a) needs amendment, or a new section needs to be added, to ensure there is</p>

		reference to the Council being committed to the protection of sports facilities and playing fields, as set out in the Council's Playing Pitch Strategy".
28	Policy GI 1	It should be made clear, somewhere in the document, where the "policies Map" referred to in section c) can be viewed; as well as the relationship between this Map and the Plan.