

Enfield Draft Local Plan

**Enfield Ignatians Rugby Football Club
Representations September 2021**



Contents

0 Summary

1 Introduction

- 1.1 Historic Context
- 1.2 Current Context
- 1.3 Protect Enhance and Improve
- 1.4 Policy Framework
 - 1.4.1 Playing Pitches Strategy
 - 1.4.2 Blue and Green Strategy
 - 1.4.3 Infrastructure Delivery Plan
 - 1.4.4 Draft Local Plan

2 Accessibility

- 2.1 Walking Catchment – Local
 - 2.1.1 Protect and Enhance
- 2.2 Public Transport Catchment – Borough
- 2.3 Drive Time Catchment – Sub-regional
- 2.4 Accessibility Conclusions

3 Draft Local Plan- Detailed Comments

- 3.1 DLP *Draft Policies Map*
- 3.2 DLP *Southbury Section 3.2*
- 3.3 DLP *Section 3.2.3*
- 3.4 DLP *Southbury Placemaking Vision*
- 3.5 DLP *figure 3.3*
 - 3.5.1 Sports Excellence Symbol
 - 3.5.2 Improvements to Open Space
- 3.6 Enfield Playing Fields to be Included in *Southbury Place Making Area*
 - 3.6.1 Call for Sites
- 3.7 *SPCL4 Promoting Sporting Excellence*
 - 3.7.1 *Hierarchy*
- 3.8 DLP *12.4.5 and 6*
- 3.9 Site Allocation
- 3.10 *Development Management Considerations*
 - 3.10.1 *Draft CL4 3.*
- 3.11 Economy
- 3.12 Culture and Tourism
- 3.13 Delivery
 - 3.13.1 “Essential”
- 3.14 Timing of the Sports Village Development
- 3.15 DLP *SP D1*

Appendices

- 1 Walking Catchment
- 2 Public Transport Catchment
- 3 Drive-time Catchment
- 4 FaulknerBrowns Enfield Sports Village, Aug 2020

Summary

In these representations to the Enfield Draft Local Plan EIRFC argue:

The Sports Village should be elevated as an “essential” element of the Boroughs infrastructure Plan delivered by the Council using innovative funding models in the early stages of the Plan period. (1.4.3; 3.13; 3.14)

- works of protection and enhancement being refunded by S.106 contributions from neighbouring developments in Southbury and Enfield Town, **(1.3; 2.1; 2.1.1; 3.14)**
- and improved sports facilities by CIL payments from developers across the Borough, sports bodies, lottery and other sources **(3.14)**

The Sports Village will be a catalyst for sustainable mixed use and residential redevelopment within the Southbury and Enfield Town placemaking areas. By bringing greater certainty to the delivery of the urban growth the Council will be seen to be proactive, protecting the Green Belt. (1.4.4; 3.13)

- The sports Village is within walking distance of sites allocated in the Draft Local Plan to deliver 5,000 new dwellings, almost all flats, and in a post pandemic era, provides quality active open space and sports facilities to support the existing and expanding population. **(2.1)**
- Sport will help define the Southbury and Enfield Town placemaking areas, creating a persona unique to North London and beyond. It will attract residents of all ages seeking healthy active sporting lifestyles. **(3.4)**
- Through the multiple use of the sports facilities the Sports Village will create a theme to encourage the co-location of organisations within the commercial and education sectors, focussed upon sports and life sciences. **(3.2; 3.4; 3.11)**
- Most obviously the Sports Village will deliver publicly accessible facilities of sporting excellence, the Council will honour commitments within the adopted Playing Pitches Strategy and numerous elements of the adopted Blue and Green Strategy. **(1.4.1; 1.4.2)**
- In particular the layout will create safe active East West links, and alternative cycling jogging and walking routes to those of the congested and polluted Great Cambridge and Southbury Roads. **(1.4.2; 3.6; 3.10.1)**



Located centrally, accessible within 20 minutes by public transport from most of the Borough, the Sports Village will be a real demonstration of the Council's efforts to address inequality, provide opportunity and inclusivity across the community. (2.2)

The site is accessible to over 2.63 million residents within 30 minutes drive. The world class facilities will be of subregional importance creating opportunities for sporting tournaments and cultural festivals in the summer months. The Sports Village will therefore contribute to the visitor/ tourist economy and should be an acceptable location for ancillary uses such as hotel, cafes creche. (2.3)

The Sports Village encapsulates much of the vision of the Draft Local Plan and EIRFC representations seek to ensure:

- Consistency in the visual and written presentation of the Sports Village in various maps and plans. **(3.3; 3.5; 3.5.1; 3.5.2; 3.7; 3.8; 3.9; 3.10)**
- EIRFC strongly believe Enfield Playing Fields should be included within the boundary of the Southbury place making area to provide for the master planning of the Sports Village, the integration of other Council assets such as the Southbury Leisure Centre Kingsmead school, QEI Stadium and David Lloyd Centre; and to identify connections with and through neighbouring sites and to public transport. **(3.4; 3.6)**

Within CL4 Enfield Playing Fields is placed in a hierarchy behind Tottenham Hotspur's training centre and Picketts Lock. EIRFC understand this order is intended to refer to the importance or status of the facilities on the sites in a national, regional and subregional context. (3.7.1)

- The explanatory text should make it clear that the hierarchy is not the Council's preference for the order of delivery or allocation of funds. The Tottenham Hotspur's training centre and Picketts Lock are commercial private sector proposals in peripheral locations. By contrast the Sports Village is an inclusive community project, publicly accessible by foot from key growth areas and by public transport benefits much of the Borough **(2.1; 2.2.1)**
- The proposals for the allocated land north of White Webbs Lane are not published, yet development management considerations are included for this site within CL4 2. These should be extended to prohibit the development of publicly accessible community or commercial sports facilities at THTC which should be directed to Enfield Playing Fields with its better connections and accessibility to public transport, thereby protecting the viability of the Sports Village proposal. **(3.10)**



Enfield Playing Fields should be included as a Site Allocation policy within the Local plan.

- EIRFC have made a Call for Sites submission during the course of this consultation period. **(3.9)**
- EIRFC propose an initial draft of the development management considerations for the site; these encapsulate the importance and scale of the opportunity. **(3.10.1)**

In general, the Draft Local Plan does not adequately reaffirm its support for the provision of community sports facilities, the role sports clubs play in the Borough, or the opportunity presented by sport, and the Sports Village in particular, for the Council to demonstrate a coordinated commitment to the delivery of its services and objectives.

- The Local Plan should restate the policies set out in the adopted Playing Pitch Strategy to protect and enhance playing fields and sports facilities. **(1.4.1)**
- The Local Plan should emphasis the major role sport and community clubs have in promoting health and wellbeing, social inclusion and equality across the Borough. **(3.13.1)**
- In the post pandemic era and in providing for sustainable growth, the Local Plan should reassess the need and standards to provide accessible well managed quality open active spaces in proximity to high density residential and mixed-use development. Over 5,000 flats are proposed in Southbury and Enfield Town. **(3.4; 2.1)**
- The Sports Village proposal presents the Council with a unique opportunity within a single project to address a wide range of policy objectives as a catalyst to regeneration, and thereby protecting the green Belt; the delivery of infrastructure; to provide longer term health, economic and social benefits across the Borough and in the deprived wards in particular; to be seen to be proactive and have a coordinated “joined up” approach. **(1; 1.4.1; 1.4.2; 1.4.3; 3.11; 3.12; 3.13; 3.13.1;**



1 Introduction

These representations to the Draft Enfield Local Plan are made by Enfield Ignatians Rugby Football Club and specifically relate to the proposal to create a Sports Village upon Enfield Playing Fields. The Club seeks to consolidate the existing policy support for the project within the Local Plan and comment upon the delivery of this essential infrastructure.

The Sports Village encapsulates the vision of the Draft Local Plan. Centrally located with good public transport and active links it connects and provides equality and opportunity across the Borough. The high-profile location will project the image of an active, healthy, inclusive community. The Village, quality open space and design will attract the colocation of business within the sports sector, residents and visitors. Sport will define and distinguish the Southbury mixed use placemaking area across London.

1.1 Historic Context

Enfield Playing Fields are owned by London Borough of Enfield. In 1939 in memory of King George V the first patron of the National Playing Fields Association the Borough entered a Trust with the NPFA (now Fields in Trust) to protect the fields for sports use.

The land is allocated as Metropolitan Open Space.

Both the Trust and the Metropolitan Open Space policies contemplate the loss of playing fields to provide improved sports and ancillary facilities.

1.2 Current Context

Enfield Playing Fields is one of the largest expanses of pitches in London, second to Hackney Marshes. The pitches are popular and well used. The predominant use of the pitches is for soccer. Enfield Ignatians is the largest single user; it leases adjacent land from the Council upon which it built its club house. The existing pavilions are now close to functional and economic obsolescence.

1.3 Protect Enhance and Improve

The playing fields are under threat from casual leisure use of the open space from existing and new residents. In September 2020 the Council resolved to grant permission for 1,800 residential units on Colosseum Retail Park and there is an expectation, reflected in the Draft Local Plan that other neighbouring sites in Enfield Town and Southbury will be brought forward for residential and mixed use development.



There are currently around 7,800 household units within a 20 min walk of the Southbury Road entrance to the Playing Fields. The Draft Local Plan Allocated Sites within walking distance of the Playing Fields have capacity for around 5,000 units; a 63.7% increase in the number of local households; almost all flats with no or limited quality open space.

On one hand it is critical that the playing fields are protected from dog walking and casual use of the open space and enhanced to provide for all users of the Playing Fields ahead of these developments. On the other, there is an exciting opportunity to develop a Sports Village, integrating a number of council assets, in a central accessible location, delivering Borough wide benefits, most obviously in Sport, Health and Wellbeing, key elements of the Blue and Green Strategy, and with careful master planning and design encouraging the multiple use of the facilities creating opportunities in Education, Business development, Tourism, and Community, Social and Cultural benefits.

1.4 Policy framework

There is already strong policy support for a Sports Village on Enfield Playing Fields.

1.4.1 Enfield's Playing Pitches Strategy April 2018 to March 2023

Identifies the need for better playing facilities and the creation of hubs for both Soccer and Rugby.

The Strategy is to be updated every 3 to 5 years to fit in with planning policy reviews. Cabinet on 18th April 2018 approved the formation of a steering group chaired by the Council's Sports and Physical Activity Team to meet biannually to review and update the Playing Pitch Strategy in line with Sport England's guidance.

The Strategy needs to be refreshed; in particular to address the growing profile and demand of the women's games and to provide a modern evidence base to masterplan the Sports Village.

1.4.2 Enfield's Blue and Green Strategy was adopted in June 2021.

Strategic Programme 2 recognises the unique and exciting opportunity to deliver world class facilities at Enfield Playing Fields, with hubs recognised as centres of excellence enhancing Enfield's reputation as a premier sports destination.

Programme 2 identifies the following projects and initiatives:

- Intensification of outdoor sports and leisure activities (this could include skateboarding and climbing)



- Phased protection and enhancement of existing facilities, including new all-weather pitches/courts, upgraded changing rooms, drainage improvements, lighting and car parking resurfacing.
- Introduction of ancillary complimentary uses (e.g. creche café).
- Integration of neighbouring assets (e.g. Southbury Leisure centre) and new connections to neighbouring residential areas, greenways (e.g. New River) and public transport routes (e.g. Southbury Road)

1.4.3 Draft Infrastructure Delivery Plan published June 2021

At 5.6 recognises as significant boroughwide shortfall of outdoor rugby and football pitches (especially at a junior level) and associated changing facilities. Enfield Sports Village is identified as an “important” project.

1.4.4 Draft Local Plan published June 2021

The Draft Local Plan was adopted by Cabinet in June 2021. SP CL4 Promoting Sporting Excellence recognises the adopted policies in the Playing Pitch and Blue and Green Strategies and identifies Enfield Playing Fields within a hierarchy of priority locations.

The dominant feature of the Draft Local Plan is the provision of new and affordable housing. 10 place making areas are identified across the Borough with sites allocated for 4,320 new residential units in Southbury and 1,297 in Enfield Town. However Enfield Playing Fields is not included within the either place making area.

We believe the Sports Village should be seen as a catalyst for the sustainable redevelopment of the surrounding sites by creating a unique active sporting persona for Southbury and Enfield Town; taking pressure off the Green Belt. The Sports Village is required to support and deliver growth within the Borough. A failure to invest could delay the delivery of the neighbouring sites in Southbury and Enfield Town; increasing the pressure on the Green Belt.

In the following sections we make representations to:

- consolidate and prioritise the proposed Sports Village at Enfield playing Fields within the policies and visual presentation of the Local Plan;
- seek to include Enfield Playing Fields within the Southbury Place Making Area;
- promote Enfield Playing Fields and the Sports Village as a Site Allocation.
- identify Development Management Considerations relating to the Sports Village,



- promote the use of innovative delivery structures to fund the construction of the Sports Village as a catalyst for regeneration, an essential project required to support and deliver growth
- to include Sports and Leisure as a priority for Community Infrastructure Levy contributions.

Before doing so it is important for us to underline the significance of the Sports Village proposal.

The need to protect and enhance the playing fields from running into disrepair and being unsafe due to increased casual leisure use generated by the proposed neighbouring developments; to create a physical environment which the Council will be able to manage efficiently.

The need to advance the quality of the playing pitches and ancillary facilities in line with the existing and to be review Playing Pitch strategy.

The breadth of the opportunity to deliver a wide range of policies and aspirations across the Borough; and that can be said with some confidence based upon the based upon the central location of the site, the accessibility to the surrounding neighbourhoods, the wider Borough and the subregion; as demonstrated by the catchment analysis and site selection of leading national retailers and leisure operators to locate within the Great Cambridge Road Retail cluster.



2. Accessibility

As an appendix we attach 3 reports analysing the demographics of the walking, public transport and car borne catchments of the proposed Sports Village measured from what is anticipated to be the main vehicular and pedestrian entrance on Southbury Road.

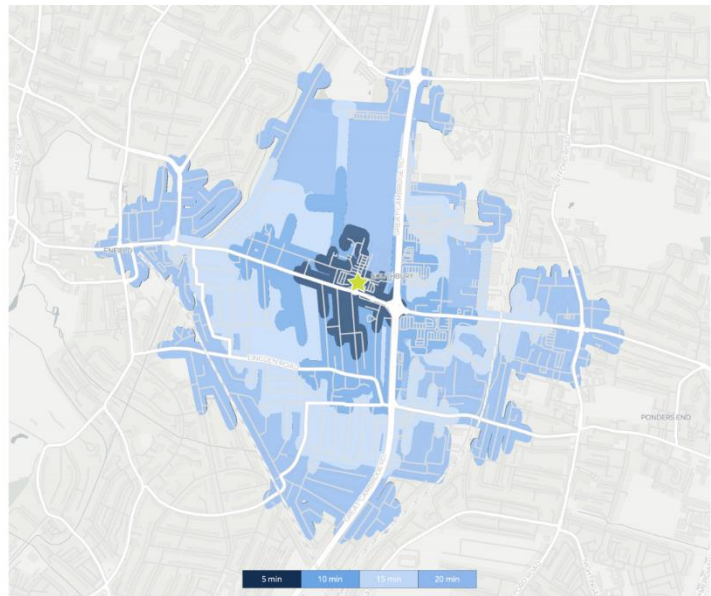
2.1 Walking catchment – Local

MAP: ENFIELD

Walk-Time	Population
10 minutes	3,960
15 minutes	10,153
20 minutes	19,998

Walk-Time	Households
10 minutes	1,461
15 minutes	3,916
20 minutes	7,807

Walk-Time	Workforce
10 minutes	1,829
15 minutes	5,210
20 minutes	10,744



The isochromes demonstrate that Enfield Playing Fields and the Sports Village would be accessible by foot within 20 mins from Southbury and Enfield Town. For Enfield Town residents the Sports Village would present a very different alternative active open space environment to those of the Town Park and New River; and for some of the sites Tesco SA6 and Civic Centre SA5 is arguably closer.

Currently within 20 mins walk there are approximately 7,807 households. Of these some 3,018 are flats around 23.6%

The Southbury and Enfield Town Site Allocations within approx. 20 mins walk have the following residential capacity:

Site Allocation	Capacity	Total
Southbury		
SA8 Sainsburys Crown Road	1,041	
SA9 Colosseum Retail Park (resolution to grant 1,800)	1,587	
SA10 Morrisons Southbury Road	892	
SA11 Southbury Leisure Park	450	
SA 12 Tesco Ponders End	350	4,320
Enfield Town		
SA4 Enfield Town Station	100	



SA5 Civic Centre	150	
SA6 Tesco Enfield Town	350	
SA7 43 Baker Street	55	655
		4,975
Enfield Town + 20 mins		
SA1 St Anne's School	236	
SA2 Palace Gardens Shopping Centre	350	
SA3 100 Church Street	56	642

Without further site allocations or windfall sites or losses the number of households within 20 mins walk of Enfield Playing Fields is projected to increase in the plan period by 4,975 units around 12,782 a 63.7% increase; assuming these all to be flats and apartments with no or very limited open space the proportion of the flats in the housing stock rises to 62.53%.

In addition, there are a further 642 units proposed in Enfield Town in the plan period.

2.1.1 The Need to Protect and Enhance

This large increase in household numbers, and in particular the nature of the new stock will place significant pressure upon Enfield Playing Fields through informal leisure activities and dog walking. The playing surfaces are unprotected presenting a health hazard to players. We are aware of Inner London Clubs who face this problem with matches cancelled abandoned or relocated, clearly impacting upon their on-field success and their ability to attract and retain players.

As a Club we objected to the Colosseum Retail Park application on the basis that there was insufficient financial commitment from the developers to mitigate the impact upon the Playing Fields.

We are concerned that there appears to be an acceptance of the concept of "pocket parks", landscaped spaces between large scale buildings, a belief, in a post pandemic world, that they provide adequate open space for both residents and workers within the mixed-use developments. Whatever the academic conclusion, surely the practical reality is that many will choose the alternative large expanse of open space offered by the Playing Fields for their picnic lunch, breath of fresh air, or some exercise. Similarly, dog walkers and those seeking informal exercise.

Putting aside the opportunity to create a Sports Village it is essential that the playing surfaces are protected; and recognising the pressure from significantly more casual leisure users of the playing fields, to enhance the pitches with better drainage, all weather surfaces capable of more intense use, framing blocks of pitches with active routes to differentiate dog walking and picnic areas and provide for the wider neighbouring community.

These mitigation works need to be master planned, costed and funded through developer contributions from the Southbury and Enfield Town development projects. The works should be completed ahead of the commencement of development projects.



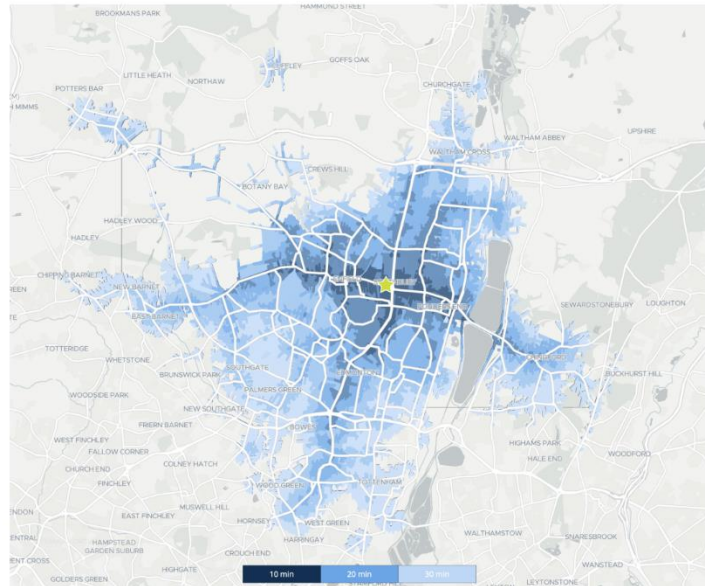
2.2 Public Transport Catchment – Borough

MAP: ENFIELD

Public Transport-Time	Population
10 minutes	24,731
20 minutes	211,397
30 minutes	506,767

Public Transport-Time	Households
10 minutes	9,767
20 minutes	82,399
30 minutes	199,723

Public Transport-Time	Workforce
10 minutes	16,822
20 minutes	66,629
30 minutes	174,207



The second report considers the accessibility of the Proposed Sports Village by public transport; again taken from the Southbury Road entrance to the Leisure Centre.

This location has a PTAL score of 4, most of Southbury Road is 3.

2.2.1 Improvements serve the Borough

It can be seen that a significant area of the Borough is located within 20 mins, particularly the East of the Borough and the North South axis of the A10 with 211,397 residents and 66,629 workers within the 20 minute isochrome. Whilst recognising that some of the catchment is in Chingford this represents around 2/3rds of Enfield residents.

The catchment at 30 minutes is 506,767 residents and a further 174,207 workers.



Buses from Enfield Retail Park

Route finder

Bus route	Towards	Bus stops
721	Enfield Lock	Enfield Lock, Turnpike Lane, Brimsdown, Edmonton Green
191	Turnpike Lane	Turnpike Lane, Waltham Cross, Enfield Chase
217	Waltham Cross	Waltham Cross, Turnpike Lane, Enfield Chase
251	Enfield Chase	Enfield Chase, Turnpike Lane
307	Barnet Hospital	Barnet Hospital, Brimsdown, Chingford, Potters Bar, Enfield Town, Waltham Cross
513	Chingford	Chingford, Potters Bar, Enfield Town, Waltham Cross
517	Waltham Cross	Waltham Cross, Enfield Town, Potters Bar, Chingford

Other Buses

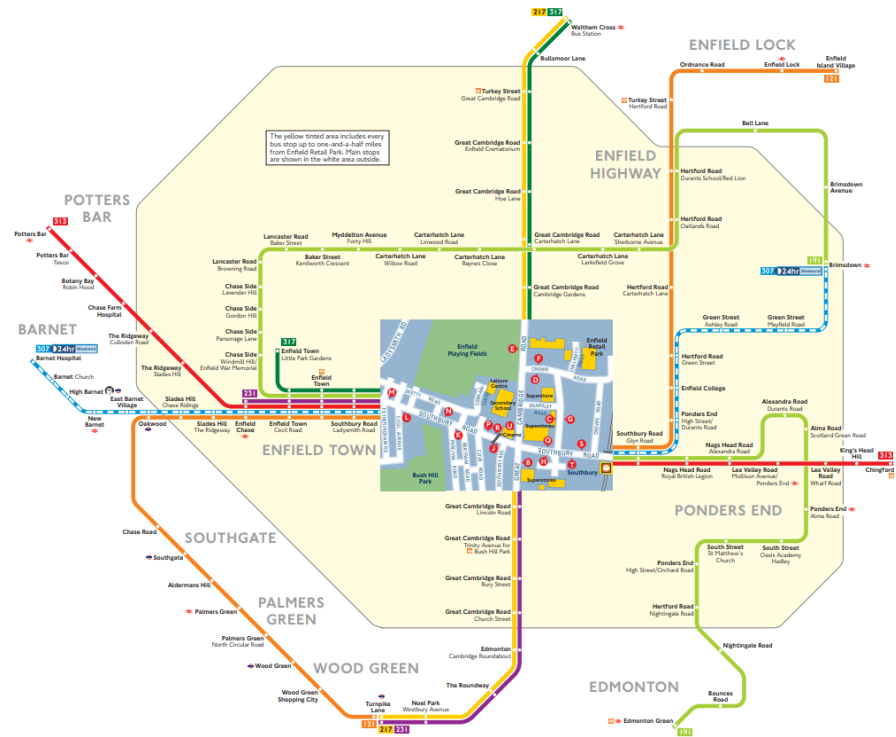
Bus route	Towards	Bus stops
617	Turkey Street Sch	Turkey Street Sch
629	Turkey Street Sch	Turkey Street Sch

Key

- Connections with London Underground
- Connections with London Overground
- Connections with National Rail
- School journeys only
- Operates daily with 24-hour service Friday and Saturday nights
- Tube station with 24-hour service Friday and Saturday nights

Ways to pay

- Use your contactless debit or credit card. It's the same fare as Oyster and there is no need to top up.
- Top up your Oyster pay as you go credit or buy Travelcards and bus & tram passes at around 4,000 shops across London.
- Sign up for an online account to top up online and see your travel history and spending



The existing bus routes serving the location are identified upon London Transport’s Enfield Retail Park bus route map. Enfield Town and Southbury stations provide additional access to the placemaking areas of Silver Street and Edmonton Green, as a consequence with the possible exception of the peripheral locations of Crews Hill- where public transport will evolve, Hadley Wood, New Southgate and Meridian Water; Enfield Sports Village is accessible by bus and train from each of the placemaking areas and the areas of intensification around public transport nodes identified in the Draft Local Plan.

The masterplanning of the Sports Village, as identified in the Blue and Green Strategy should seek to exploit the existing public transport connections to the South.

By contrast the SP CL4 priority locations for sporting excellence; Tottenham Hotspurs training centre (PTAL 0) and Picketts Lock (PTAL 1b), are poorly served by public transport and peripheral to the Borough.

Enfield Playing Fields and the proposed Sports Village present the opportunity to provide high quality sports facilities easily accessible by public transport from most areas of the Borough, particularly the disadvantaged wards to the East and South of the Borough.



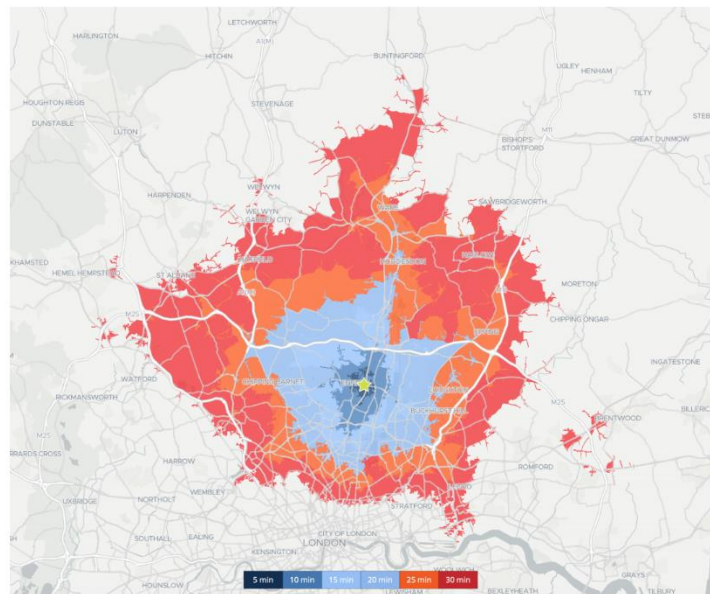
2.3 Drive Time Catchment – Sub-regional

MAP: ENFIELD

Drive-Time	Population
10 minutes	214,936
20 minutes	939,987
30 minutes	2,633,072

Drive-Time	Households
10 minutes	82,855
20 minutes	369,971
30 minutes	1,042,252

Drive-Time	Workforce
10 minutes	67,474
20 minutes	285,134
30 minutes	844,919



The third report identifies the catchment within 10, 20 and 30 mins drive from the Southbury Road entrance. Not surprisingly given the proximity of the A10 which links the M25 and A 405 North Circular Road the location is very accessible by car, with a resident population of 214,936 within a 10 minute drive; 939,987 people within 20 mins and 2,633,072 people within 30 minutes drive.

As a central location within the Borough and at the junction of an Gt Cambridge Road A10 a North South arterial road and a key intersection with the East West A110 Southbury Road the location is easily accessed by car from all parts of the Borough within 10 to 20 minutes.

The 20 minute and 30 minute drive time catchment demonstrate the site is accessible to large parts of North London and beyond. With high quality world class facilities the Sports Village has the potential to serve a wider sub regional catchment; to be a visitor and tourist attraction generating income and employment.



2.4 Accessibility Conclusions

Enfield Sports Village is therefore perhaps uniquely located within the public transport and road network to serve both local, boroughwide and subregional catchments. It is both a “gateway” site given its profile to the A10 but by its central location; accessible by various modes of transport connects the Borough.

In earlier sections we have discussed the need to mitigate the impact of development and protect and enhance the existing playing fields; but given the accessibility of the site and the pressures for change within Southbury and Enfield Town there is now an outstanding opportunity to create sports facilities which benefit the whole of the Borough, and for the theme of sport to bring an identity and be a catalyst for the neighbouring residential and mixed use development, to encourage inward investment by sports related industries and attract residents seeking sporting active and healthy lifestyles,



3. Draft Local Plan Detailed Comments

In this section specific re-drafting proposals are highlighted in boxes, as below.

3.1 *Draft Policies Map*

Enfield Playing Fields should be designated as Sporting and Leisure on the Draft Policies Map cross hatched over Metropolitan Open Land.

3.2 DLP *Southbury Section 3.2*

This section completely ignores the existence of Enfield Playing Fields, adopted policies for improvements to the open space and the huge potential for the proposed Sports Village to be a catalyst for the mixed use regeneration of Southbury.

The delivery of world class sports facilities within the Sports Village will act as a draw for inward investment in a number of related sectors, such as sports science, media, education, leisure and tourism and attract residents in a post pandemic era seeking healthy active lifestyles with immediate access to quality open space and sports facilities, close to their place of work or with good public transport access across Enfield, to the City, West End or further afield.

The Blue and Green Strategy identifies the Sports Village as a key programme; and the need to integrate neighbouring assets and create new connections to residential areas, greenways and public transport.

There is a need to provide safe crossings of the A10; to establish attractive east west and north south active links away from the congested and polluted Gt Cambridge and Southbury Roads.

These requirements impact upon the masterplanning of the Allocated Sites within Southbury, most obviously SA11 Southbury Leisure Park and SA8 Sainsburys Crown Road and others. There is a need to masterplan the Sports Village itself; to improve pedestrian and vehicular access, to protect and enhance existing facilities, framed with jogging walking and cycling circuits; to consider the massing and location of new buildings and ancillary uses to encourage the multiple use of the assets; the location of all weather surfaces; to provide quality open space for all users of the Fields to serve the existing residents and proposed high density mixed use scheme and to consider the setting of the Listed QE Stadium.



3.3 DLP Section 3.2.3

Enfield Playing Fields are a defining characteristic of the Southbury area.

3.4 Southbury Placemaking Vision

The proposed Sports Village presents a huge opportunity to distinguish Southbury from other mixed use development quarters across London; the “go to” place for individuals and companies seeking to locate in an accessible healthy active sporting environment; and should be fully integrated within the Southbury placemaking vision.

With considered design and master planning the Sports Village facilities will be capable of multiple use and available to attract residential, commercial and education users.

The facilities would be attractive to all age groups, for senior living and care home operators; specialist providing accommodation for the disabled sectors, the young, students and traditional family units.

In the field of education, the facilities could be shared by preschool providers, be available to the neighbouring John Spicer Primary School and Kingsmead Secondary School. Opportunities may exist in higher education for a college presenting NVQ courses in sports and related topics, or to be the home of a sports science faculty of a university offering residential degree courses.

Similarly the sport and education facilities may attract the co-location of commercial organisations in sports and life sciences. Providing a core of occupiers for the mixed-use redevelopment.

This range of activity and vitality throughout the week requires the support of ancillary uses and creates opportunities for example for creches; cafes and potentially a hotel meeting demand from visitors to the Sports Village and the neighbouring mixed use development.

The Sports Village Improves the viability and prospects of the early delivery and completion of the Southbury and Enfield Town regeneration sites and thereby reduces pressure upon the Green Belt.

Pocket parks are surely inadequate to sustainably accommodate post pandemic expectations around open space. Notwithstanding the apparent academic justification for the acceptance of Pocket Parks the practical reality is the residents and workers will choose to use the neighbouring open space of Enfield Playing Fields for much of their informal leisure activities.

At the very least the master planning should recognise the pressure that will be generated upon the Playing Fields through the construction of over 5,000 flats and the intensification of employment in the area; providing safe links to the open space, protecting and enhancing the playing fields to create opportunities for local residents and workers to enjoy quality well managed open active space, and deliver key elements of the Playing Pitches and Blue and Green Strategies.



3.5 *Figure 3.3 Southbury placemaking vision*

3.5.1 Sports Excellence Symbol

Enfield Playing Fields is a key element of the Blue and Green Strategy and SP CL4. It should be notated with the symbol for Sports Excellence Area as it appears on the Figure 2.1 Key Diagram

3.5.2 *Improvements to Open Space*

The plan figure 3.3 indicates improvements to the boundary of the Enfield Playing Fields; however, the Blue and Green Strategy refers to the introduction of sports hubs, new sports such as climbing and skateboarding, new facilities and ancillary uses such as creche and cafes.

The mitigation of the impact of neighbouring mixed-use developments requires the protection and enhancement of the pitches; the introduction of active routes within the Playing Fields site.

SP CL4 promotes the development of first class publicly accessible strategic sport and leisure facilities.

The Playing Pitches Strategy will be subject to review throughout the Plan period and will recommend improvements to Enfield Playing Fields in line with the contemporary recommendations and guidance of Sport England and other bodies.

The Open Space within Enfield Playing Fields should additionally be notated as "Improvements to Open Space" (as is Town Park on the Enfield Town placemaking vision figure 3.2)

3.6 Enfield Playing Fields to be included in *Southbury Place Making Area*

The Southbury Placemaking area should be extended to include the Enfield Playing Fields. The playing fields are a defining characteristic of the Southbury area and with the Sports Village will continue to provide a vital component of the open space provision for Southbury.



The improvements described above are significant and need to be master planned as part of the adopted SPD:

- within the site
- in relation to the integration of neighbouring sites such as Southbury Leisure Centre, Kingsmead school, and QEII Stadium;
- to create vehicular and pedestrian access and connections to public transport.
- The scale massing and location of new facilities is to be considered.
- Importantly the playing fields will deliver alternative east west and north south active routes away from the A10 and Southbury Road- these active routes need to be continued and protected through the Southbury development sites.
- The master planning should consider innovative above grade solutions to bridge the A10 (from a carpark deck or trading level on the East to a structure on the West?); separating vehicular from pedestrian and cycling movements.
- The master planning of the Enfield Playing Fields site- in particular the works of protection and enhancement; and improvement will inform costs estimates, the infrastructure delivery plan, CIL and s 106 considerations.

3.6.1 Call for Sites

EIRFC has made a submission in the current “Call for Sites” to include Enfield Playing Fields as an Allocated Site policy proposing improvements to the open space and sports facilities, the development of a Sports Village together with ancillary uses.

The proposed boundary includes adjacent Council landholdings such as Southbury Leisure Centre, QE11 Stadium, David Lloyd Centre and vacant land North of the EIRFC clubhouse

3.7 *SP CL4 Promoting Sporting Excellence*

The key policy statement regarding Enfield Sports Village

Given the adopted policy support in the Playing Pitches and Blue and Green Strategies the proposed Sports Village on Enfield Playing Fields is rightly identified as a priority location. The commentary above largely seeks to consolidate that position in the visual representation of the Draft Local Plan elsewhere in the document; and to extend the Southbury Placemaking area to integrate and masterplan this significant project.

CL4 raises 3 concerns; firstly CL4 1.b introduces a list, a hierarchy of priority locations in which Enfield Playing Fields sits behind Tottenham Hotspur’s training centre and Picketts Lock. Secondly both Tottenham Hotspur’s training centre (THTC) and Picketts Lock appear as Site



Allocation policy SA62 and SA56 respectively. Thirdly in CL4.2 development management considerations are identified for the THTC whereas non appear for Enfield Playing Fields.

3.7.1 *Hierarchy*

SP CL4 1.b. introduces the concept of a “hierarchy of priority locations” but neither the policy nor the explanatory text provides any guidance to interpret this phrase. We believe it is intended to suggest that the facilities at each of the locations have a national, regional, subregional or Borough wide importance due to the quality, scale and draw of the facilities; not ambiguously the order or preference of the Plan to allocate investment.

THTC is a private facility. It is understood to house some of the best training facilities in Europe and that the Club would wish to continuously enhance the centre to maintain a competitive advantage over its rivals. We have seen media commentary that the Club is keen to expand the facilities to the West over part of White Webbs golf course to accommodate the aspirations of their women’s team but can find no planning application or explanation of proposals to include a large area of land to the north of White Webbs Lane to the M25 allocated in the in the Draft Policies Map and SA62.

The site allocation at Picketts Lock SA 56 related to the land currently occupied by the multiplex cinema, freestanding restaurants and surface car parking. It is understood the proposal here is to introduce a wave park similar to those outside Bristol and Snowdonia which would be a private sector commercial attraction drawing customers from across London.

The Sports Village Proposals at Enfield Playing Fields are community led, accessible and inclusive to all and will house world class facilities with a sub regional draw beyond North London.

If we are incorrect and the term hierarchy is intended to present the order or preference for investment for example of CIL monies or other public sector support then we would contest that on the current evidence the Sports Village at Enfield Playing Fields should be the number 1 priority. We say this because:

And using the terminology of CL4 1.b. THTC is not currently publicly accessible and does not meet the needs of (the current or) growing population.

The proposals at THTC and Picketts Lock are both private sector commercial projects whereas the Sports Village will be a public sector led.

Both THTC and Picketts Lock are located on the periphery of the Borough with poor public transport provision or active travel connections to residential areas. From the TFL web site the PTAL rating for THTC is zero (not 1a/1.b as stated on the SA 62) and 1a at Picketts Lock. By contrast The Sports Village is centrally located with a PTA rating of 3 to 4 at the Southbury Leisure centre entrance. The attached demographic analysis has shown is accessible by foot from the urban place making centres of Enfield Town and Southbury and much of the Borough within 20 mins using public transport, especially among lower social economic groups (12.4.3) of the Eastern and Southern wards.



Enfield Playing Fields are already established as the largest centre for community-based soccer in the Borough. Despite the need for the significant improvement of the playing and changing facilities (identified as a soccer hub in the Playing Pitches Strategy) it would be inappropriate to shift the focus of community-based soccer to the land north of THTC allocated as CL4 on the draft policies map and Site allocation SA62; it has poor accessibility and by doing so would undermine the critical mass, viability and economies of scale in the construction, day to day management and multiple use of the Sports Village facilities.

More than any other site the proposed Sports Village on Enfield Playing Fields clearly addresses the bullet points of 12.4.4. We have highlighted the wide-ranging regeneration, socio economic, blue green environmental, community and cultural benefits of the Sports Village project elsewhere in these representations.

3.8 DLP 12.4.5 and 6

Should note outdoor sport and recreational uses are also deemed appropriate in Metropolitan Open Land.

3.9 Site Allocation

Tottenham Hotspur's training centre and Picketts Lock are both Site Allocation policies within the Draft Local Plan; SA62 and SA56 respectively. Enfield Playing Fields do not have a Site Allocation policy in the Draft Local Plan.

Enfield Playing Fields are owned by the Council, there is a strong adopted and emerging policy support for significant improvements including hubs for soccer and rugby within the Playing Pitches Strategy adopted April 2018 and for a Sports Village within the Blue and Green Strategy adopted June 2021. The site is identified as a priority location for Promoting Sports Excellence in the Draft Local Plan. The Sports Village concept, design and layout will evolve and we argue should form part of the master planning of Southbury place making area, but it is clear that over the plan period it is intended that significant improvements to the sports facilities at Enfield Playing Fields are both required and are intended to take place.

Enfield Ignatians Rugby Football Club as a key Stakeholder in the Enfield Playing Fields will submit a Call for Sites Submission within this stage of the Draft Local Plan Consultation process. If it were needed this would place the Playing Fields in the same standing as the THTC and Picketts Lock sites.

Consideration should be given to the extent of the boundary; for example the inclusion of the Councils other assets such as Southbury Leisure Centre, QEII football and athletics Stadium and the David Lloyd Centre.

The description of the proposed use to distinguish the nature of the project from the proposals at THTC and Picketts Lock; a Community Sports Village housing centres of excellence for a wide range of outdoor sports and leisure activities and complimentary uses.



3.10 Development management considerations

SP CL4 2. Refers to Tottenham Hotspur’s Training Centre and surrounding land. The training centre is largely complete with applications for some improvements such as the addition of a media centre. There are reports of discussions with the Council to extend onto land on White Webbs golf course outside the Site Allocation. We can find no reports or applications relating to the land north of White Webbs Lane to the M25.

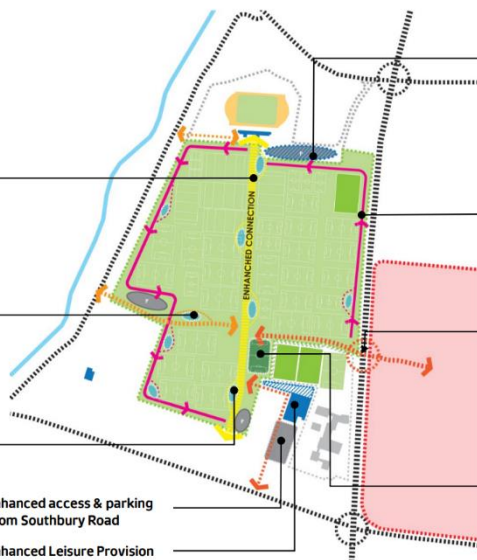
CL4 2 introduces the Green Belt policy background and identifies development management issues to be satisfied in the consideration of further applications in relation to SA 62. In addition, although it is to be hoped that greater clarity will emerge during the evolution of the Draft Local Plan in relation to the nature of the proposals beyond the existing training centre we believe it is important and to protect the adopted policies to promote and deliver the Sports Village at Enfield Playing Fields. For example, to construction of a “Goals Soccer Centre” at White Webbs Lane could undermine the viability of the Sports Village.

CL4 2 additional consideration: Ensure the development does not prejudice the vitality, viability, or delivery of the proposed Sports Village on Enfield Playing Fields by introducing competing community or commercial sports leisure or ancillary uses which should be located with better public transport and active travel connections to residential areas.

We have given some consideration to the development management considerations associated with the Sports Village and improvements to Enfield Playing Fields. These initial considerations flow from the site analysis contained in the attached FaulknerBrowns document, particularly page 18; and would inform and be supplemented by the Southbury Place making masterplan and SPD.

OPPORTUNITIES ACTIVITY STRATEGY

Enhanced Circulation Routes With Activity / Sports Feature



Possible Development Opportunities To North

Promote Activity Through Site Via Jogging/Walking Trails



Enhanced Connectivity From East , A10 & Proposed Residential Development Zone

Enhanced Support Facilities To Pitches





3.10.1 DLP *CL4 3*

Enfield Playing Fields [as shown on the Policies Map][and as Site Allocation policy SAXX] continues to be designated as Metropolitan Open Land and is identified for the potential development of community sports, recreation and leisure facilities , including ancillary and complimentary uses, in line with Metropolitan Open Land policies in this plan and the following development management considerations:

- I. Enhance and protect the beneficial existing sports recreation and leisure use of this land through positive management; and address deficiencies identified in the Playing Pitch Strategy and Blue and Green Strategy
- II. Provide new sports, recreation and leisure facilities designed and constructed in line with Sport England and relevant guidance from national sport governing bodies; which are open to the wider community; encouraging social inclusion and increased community safety and security.
- III. Seek to integrate with neighbouring sports, recreation, and leisure assets. Creating a sports hub to promote more active and healthy lifestyles.
- IV. Integrate with, and form part of the wider blue green infrastructure network contributing to East West connectivity and an alternative to the A10 cycle jogging and walking route
- V. Be well connected and way marked to other open spaces and routes, especially neighbouring public transport connections, residential areas and the place making areas of Enfield Town and Southbury.
- VI. Respect and enhance the setting of the Grade 2 Listed Queen Elizabeth Stadium
- VII. Be visible and accessible form the public realm surrounding the site.
- VIII. Ensure no unacceptable visual, landscaping, light, or noise impacts.
- IX. High quality design standards, including high sustainable construction and operational standards.
- X. All new landscaping to include appropriate species selection and management to provide biodiversity and climate change resilience.
- XI. Deliver community access, education, and socio-economic improvements.
- XII. Accord with other relevant policies of the Local Plan



3.11 Economy Chapter

Within these representations it has been argued that the creation of a Sports Village at Enfield Playing Fields has the potential to attract commercial organisations seeking to locate in an active, healthy sporting environment; and particularly an opportunity to encourage the co-location of business focussed upon sport and life sciences, perhaps sports media and other sectors.

The Sports Village and Improvements to Enfield Playing Fields will also have a positive impact helping to transform the Strategic Industrial Sites by creating better working environments for workers and attracting progressive businesses.

Within the Sports Village a variety of employment opportunities will be available throughout the working week, weekends, early mornings and in the evenings. These longer hours and peaks present varied hours suited to those with dependents; single parents and carers and others seeking flexible working hours to suit their domestic needs.

Elsewhere we have described the multiple use of the sports and active facilities within the Sports Village and Playing Fields which could attract specialist residential providers in the senior living and care sectors and education providers locating within or adjacent to the facilities, there will be ancillary uses such as creche cafes potentially a hotel, generating alternative employment opportunities for a variety of skills and groups.

In the accessibility section we have described the walking catchment and the good accessibility to Enfield Town and Southbury and the public transport accessibility to much of the Borough and in particular to the wards to the East and South. The Sports village and complimentary uses will generate opportunities and training for residents in these areas.



3.12 DLP Chapter 12 Culture, Leisure and recreation

Beyond Sport the Village and playing fields could make a significant contribution to Culture and Arts in the Borough.

CL1.3 The Enfield Playing fields and Sports Village presents an excellent opportunity for outdoor art culture and performance activities, for example sculptural waymarking on activity routes within the playing fields, and festivals.



Art commissioned by EIRFC for clubhouse by local artist

CL2 the Sports Village will attract visiting teams and supporters. The facilities could be used in the summer months to host various festivals

CL3 Enfield Playing Fields may present an opportunity for an appropriately located hotel serving the Sports Village and Southbury. At 12.2.2 major visitor accommodation (e.g. hotels) outside town centres will be subject to the sequential test. We are concerned that whilst an appropriately located hotel in walking distance to public transport within or adjacent to the Sports Village would meet the general description of both CL3 1 and CL3 2, such a beneficial proposal, potentially capable of cross funding the Sports Village or contributing to its revenue subsidy may fail the sequential test if an alternative site were available in Enfield town.

CL3 1 ...And other locations such as the proposed Sports Village at Enfield Playing Fields which are within walking distance...



3.13 Delivery Chapter

In a sense we are posing a simple question: Are Southbury, the Borough and the Green Belt stronger or weaker with or without the Sports Village? We believe the answer is stronger. That the answers are interrelated in that Southbury in particular will be more a sustainable place of higher value with a unique persona attractive to business and residents; the more certain delivery of the urban placemaking sites will relieve pressure upon the Green Belt; the impact of the Sports Village will be Borough wide and not limited to the health and wellbeing agenda.

The key is the early delivery of the Sports Village.

The theme of sport generates a diversity of use and depth of occupational demand from a wide range of residential commercial education and ancillary uses within the Sports Village and surrounding mixed use sites. The early delivery of the Sports Village improves the viability and risk profile of the redevelopment since developers will expect a greater velocity of residential sales and lettings in a range of residential sectors and have a focus upon which to target and prelet commercial and other occupiers. This profile shortens the development programme, reducing holding costs and presenting opportunities to prefund significant elements of residential and commercial floorspace. It would be reasonable to argue that values would be greater where there is an immediate proximity to quality well managed active open space, sports and recreation facilities.

We are making representations to include the Enfield Playing Fields within the Southbury Placemaking area. The spatial framework or master plan should reveal an understanding of the measures and costs required to

- protect and enhance of the existing playing fields;
- integrate the blue and green strategies to create active links to neighbouring districts, urban greening etc
- understand the scale a nature of the Sports Village opportunity, identify the multi purpose facilities and integration of ancillary uses
- identify the infrastructure and services required to deliver the proposal.

These components of the whole project could with master planning potentially be delivered in phases; be the responsibility of different stakeholders; be funded through alternative structures. Some elements may be considered "critical"- protection and enhancement. Seen in the isolation of the Playing Pitches and Blue and Green strategies the Sports Village is "important" in the draft Infrastructure Delivery Plan but we would argue "essential" when the project is considered holistically with its regenerative impact and wide-ranging policy benefits.



3.13.1 *“Essential”*

The increased population requires additional sports facilities. The mixed use and residential developments of Southbury and Enfield Town cannot come forward in a sustainable way- in a post pandemic environment- without quality active open space provision. A failure to invest in the Sports Village could delay the delivery of the sites in Southbury, in particular, and Enfield Town- with lower residential and commercial values the redevelopment of the retail and leisure parks becomes more challenging. The Sports Village is required to support and deliver growth across the Borough.

Without an early intervention there is a significant risk that the existing pitches will be damaged to such an extent that the clubs using them, such as EIRFC, become unsustainable being unable to retain and attract players.

The Sports Village contributes to a wide range of Borough wide initiatives, for example delivering equality across the Borough with good access from the deprived wards of the East and South. Using the numbering of the Infrastructure Delivery Plan:

- 3.4 Important destination (interchange?) in North East Enfield Bus Network- links to wider industrial areas, Brimsdown and Enfield Lock Stations
- 3.5 Highway safety-potential new bridge construction over the A10.
- 3.6 Cycle Enfield/Healthy Streets- contributes to enhanced active links between East West Enfield Town Southbury and Ponders End and North South- as alternatives to the congested and polluted Southbury and Gt Cambridge Roads.

Enfield Playing Fields link to New River Loop.

- 4.4 Renewable Low Carbon Energy- Playing Fields are an open area- use of solar power- ground heat etc, Electric Charging- whilst vehicle owners enjoy the Sports Village facilities.
- 4.7 Digital- The Sports Village and playing fields should be an exemplar site. Using technology to improve personal safety, for bookings, performance analysis and more generally for users of the open space.
- 5.3 Publicly Accessible Green Spaces- Open space improvements to Enfield Playing Fields
- 5.5 Public Realm Improvements- Improvements to A10 Gt Cambridge Road and within Enfield Playing Fields
- 5.6 Improvements to Southbury Leisure Centre
- 5.8 Biodiversity and Urban Greening- enhance A10 frontage and within Enfield Playing Fields
- 6.5 Education- Pre school and or creche to support Sports Village users and Southbury residents/ workers with high quality setting and activities.



- 6.7 Education improved co-located and shared sports facilities with Kingsmead School.
Potential Sports Academy multiple use of sport and ancillary facilities.
Further or higher education: Potential Sports Science faculty- with teaching and student accommodation or on neighbouring mixed-use sites
- 7.2 Healthcare Infrastructure- Potential senior living accommodation-Retirement or Care Village? joint use of active and sports facilities
- 8.3 Community Facilities- multiple use community facilities within Enfield Sports Village
- 8.4 Culture- Enfield Sports Village as an Outdoor Arts Location and venue for carnivals and festivals particularly in the summer months

The above list underlines the need for master planning; the scale of the opportunity; social inclusion equality and opportunity; with activity, sport, health and wellbeing at the core of the community and available from cradle to grave. The multiple use of the sports and ancillary facilities delivers extraordinary “value for money” by contributing to so many policies and initiatives.

For these reasons we believe the Sports Village and improvements to Enfield Playing Fields should be seen as an “essential” priority within the Infrastructure Delivery Plan

3.14 Timing of the Sports Village development

The protection of the existing pitches needs to be early in the plan period and ahead of the occupation of large-scale developments in Southbury or Enfield Town. It is preferable that the protection is introduced simultaneously across the whole of the site; since to protect part will concentrate casual leisure and dog walking activities on the remaining pitches which will then deteriorate at a faster rate.

The Sports Village will have its greatest regenerative impact if delivered early in the Local Plan period. The Completed Sports Village will add value to the neighbouring sites; improving the viability and prospects of redevelopment. The project would be a clear statement of the Councils commitment not only to its active sport health and well being programme, but to the regeneration of Enfield Town and Southbury and to relieve pressure on the Green Belt.

The ideal scenario would be for the Council to commit to the project through a loan repaid over time through:

- S106 payments from neighbouring developers funding works to protect and enhance the Playing Fields mitigating the impact of their schemes
- CIL contributions from developers across the Borough to contribute to works of improvement
- Land Sales



- Pre funding of elements of the development; for example complimentary ancillary uses let on lease, for example creche, café, hotel, maybe student accommodation if it were possible to attract a university sports faculty. The investment sales are likely to generate a greater contribution if the Council were to “wrap” their covenant around the income streams.
- Grants/ loans from national sports bodies. Lottery.
- By alignment to funds available for specific strategies of central government and London Mayor

An alternative strategy would be to complete the development in phases; this would require harmonisation of the master planning with the financial model; would expose the Council to less risk, although it would still have to intervene with initial loans for some early phases of the project. The project would take an uncertain number of years to complete and would have far less regenerative impact.

We believe that the Sports Village should be seen by the Council as a catalyst for the regeneration of Southbury and for this reason should consider it to be an essential priority of the Infrastructure Development Plan.

The early delivery of the Sports Village will require the Council to consider a range of innovative funding models and seek boroughwide CIL contributions from developers given the wide ranging benefits and accessibility the project delivers.

3.15 DLP *SP D1*

Sports and leisure facilities should be included in the List of Other priorities