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Strategic Planning and Design
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Dear Sir/Madam

Draft Local Plan (New Enfield Local Plan, Regulation 18 – June 2021)

We act on behalf of Tottenham Hotspur Football Club (“THFC”) in relation to their land interests in the Borough. These include their existing Training Centre at Hotspur Way, land to the north of Whitewebbs Lane and land to the west of the Training Centre, including both the land referred to as the Western Field and the former Whitewebbs Golf Course on which THFC are shortly to take a long lease.

THFC welcome the opportunity to engage in the Local Plan process and are supportive of Enfield Council’s desire to ensure that their Development Plan is up to date, reflects both current government guidance and seeks to address positively the development needs of the Borough.

THFC do not wish to comment specifically on development management policies, except in the cases outlined below, although no comment on these matters does not necessarily demonstrate their support or objection to the policies where no comment is made at this stage. THFC’s interests are most specifically concerned with the effect of the New Enfield Local Plan (“NELP”) on their land in the north of the Borough and, notably, those covered by Site Allocations SA57 and SA62.

In making the following comments on the Plan, THFC have had regard to both the draft NELP, published on 21 June and the draft Local Plan Errata issued in August 2021.

THFC Land Interests in Enfield Borough

Attached to this correspondence is a separate document (Policy Designation for Tottenham Hotspur Football Club Training Centre and Surrounding Land, August 2021, Version 3) which explains the THFC’s interest in four specific parcels of land, which are shown on Figure 2.1 of the document, namely:

- The existing Training Centre for THFC.
- The Western Field and adjoining Dickinsons Meadow.
- Whitewebbs Park and Golf Course.
- Land to the north of the Training Centre.





A full explanation of the Club's interest in the above 4 components of land is outlined in Section 2 of the Document.

The site is the subject of several planning designations within the NELP, some of which have been carried over from the existing Local Plan or reflect statutory designations. These include:

- Local Plan designations for the following:
 - Sporting/leisure uses.
 - Conservation Area.
 - London National Park.
 - Site of Metropolitan Importance for Nature Conservation.
 - Local Open Space.
 - Area of Special Character.
 - Nature Recovery.
 - 40 Hall Conservation Area.
 - Area of Archaeological Importance.
 - Scheduled Monument and Local Heritage Asset.
 - Registered Parks and Gardens (40 Hall and the Lee Valley Regional Park, to the south – the latter incorporates the south each of the Training Centre).
 - Flood Zones 2/3.
 - Northern Thames Basin National Character Area.

The attached document provides the environmental and planning context for these Representations and demonstrate the appropriateness of the 4 components of land outlined above, for professional sport, recreation and community sport/leisure uses, as well as ancillary related facilities, and how such development can be accommodated within the local environment without harm and with the prospect of improvement, to local environmental conditions.

It is in the above context, and that contained in the attached document, that the following representations to specific aspects of the Plan are made.

Policy Specific Comments

Outlined below are THFC's comments on specific policies (and reasoned justification) of the NELP.

Draft Strategic Policy SP CL4 (Promoting Sporting Excellence)

This Policy sets an objective of contributing to the growing reputation of the Borough as a sporting and recreational hub of national and international importance for a range of sporting activities. This contributes to the objectives set out in EC's *Enfield Health and Wellbeing Strategy*.



Policy SP CL4 supports THFC's Training Centre and adjoining land as a key facilitatory and contributor towards the development of "first class" strategic sport and leisure facilities. THFC supports this aspect of the Policy.

The Policy, however, suggests that the strategic sport and leisure facilities should be publicly accessible. It is outlined in the attached Policy Designation Document that the existing Training Centre provides community access to the Training Centre in a variety of forms and THFC will continue to provide such community access both as part of the existing operations and future development. However, in order to protect professional sporting environment, any public access must be managed in an appropriate manner. Therefore, whilst THFC support public access, this can only be on the basis of its compatibility with the professional sporting environment that is the main focus of the Training Centre use.

Consequently, in the case of the THFC Training Centre designation, it is necessary for the Policy to recognise that public access should be managed in a way that is compatible with the professional sporting function of the training centre.

Similarly, the Policy requires optimising access to, and through the designated site by pedestrian and cycle. Again, THFC are supportive of ensuring appropriate access to the site, and support improvements to such, although access through the site by the public will need to be managed where such is required beyond any existing public rights of way. This again is to protect the professional sporting function of the area.

As noted above, THFC respectfully request modifications to Criterion B to clarify that public access should be managed. In addition, the Criterion should remove the Training Ground from the hierarchy of public sporting locations as presently drafted the Policy suggests that THFC's Training Centre is a key public sports facility and will be so in the future.

Turning to the geographical coverage of the Policy, it is noted this refers solely to the area shown on Site Allocation SA62, which currently excludes the former Whitewebbs Golf Course. For the reasons explained below and as agreed with Officers in discussions on the emerging Local Plan, the former Whitewebbs Golf Course Site (currently shown as draft designation SA57) should be incorporated into the new SA62 Allocation.

Finally, under the Development Management criteria of the Policy where they relate to the Site Allocation, the matters raised after the 2 x bullet points covering heritage issues within the Policy, ie, Criterion (vi), should be identified as separate Criterion, as they are unrelated to the heritage matters covered by Criterion (vi).

The above comments have been incorporated into suggested amendments to Policy SP CL4, which are attached (Enclosure 2) separately to these Representations.



Explanatory Text – Paragraph 12.4.1

Paragraph 12.4.1 refers to various sporting attractions within the Borough. The paragraph references golf courses, and specifically Whitewebbs Park. This Golf Course is closed and should be removed from the explanatory text.

Similarly, the list of sporting attractions refers to “Training Grounds” and specifically THFC’s Training Ground. However, we would respectfully suggest that this is not an “attraction” but more a facility.

We, therefore, suggest modifications to the explanatory text as shown in the attached (Enclosure 2).

Draft Strategic Policy SP PL8 (Rural Enfield) – A leading destination in London’s National Park City

THFC supports this Policy which provides a positive approach to proposals which contribute positively to the delivery of the Rural Enfield objectives within the London National Park City.

Notably, the Policy supports proposals to improve the hub of sporting excellence at THFC’s training ground. For the reasons explained above and in the attached document, THFC support this aspect of the Policy, as well as the wider objectives of the Policy.

Draft Strategic Policy SP BG1 (Enfield’s Blue and Green Infrastructure Network)

THFC support the Plan’s protection, maintenance and enhancement of the blue and green infrastructure network and the long-term vision of EC to create a green and distinct place.

The Policy supports the provision of the “*World Class Sport Villages*” at Hotspur Way, along with other areas, notably Enfield Playing Fields and Firs Farm. There is, however, no definition within the Plan to the term “*World Class Sport Villages*”. To ensure consistency with other policies (namely, SP CL4) the Policy should be modified in its reference to the SA62 area (as proposed to be extended to include SA57) as “*professional and community sports, recreation and leisure facilities, including ancillary and related uses*” rather than “*Sport Villages*”.

THFC object to Criterion (j) where it relates to land at Hotspur Way and Whitewebbs Park. Notably, the Policy suggests that revitalisation of open spaces and leisure/recreational activities should take place in these two locations, along with other areas within the Borough. The Criterion appears to suggest that there is a need to improve open space and leisure/recreational activities in this area. The development management for these areas is contained in Site Allocation SA62 and draft Strategic Policy SP CL4. Together, the Allocation and Policy SP CL4, provide an appropriate development management approach to open space and recreation/leisure objectives for this site. We therefore respectfully request that Criterion (j) is removed from the Policy where it relates to SA62 (as proposed to be extended to include SA57).

Please see the attached proposed amendments to the Policy SP BG1 (Enclosure 2).



Explanatory Text Paragraph 6.5.5

THFC support the identification of land at Hotspur Way (site allocation SA62, as proposed to be extended to include SA57) as “major developed site” given it comprises substantial areas of previously developed land. It appears to suggest in the text that future development will only be countenanced where existing uses become redundant and, therefore, does not consider development proposals that are in addition to existing functions of the area. THFC respectfully request that this aspect of the Policy is clarified, and that it is made clear that the MDS designation applies to further development at the SA62 site, and not only in cases where the existing uses become redundant.

It is not necessary, however, for those cases where further development is proposed for a planning brief or masterplan to be prepared.

We respectfully request that modifications are made to this explanatory text, as shown in the attached.

Site Allocation SA62: Land at Tottenham Hotspur Football Club Training Ground

It is noted that the location plan supporting the allocation has been updated in the most recent errata (August 2021). THFC support this errata.

This Allocation which contains “*land use requirements*” for the provision of “*professional sport, recreation and community sports/leisure uses, including ancillary related facilities*” is supported by THFC.

Notably, the allocation specifically identifies the land as including the Golf Course, although erroneously that part of the site is dealt with under a separate draft allocation SA57. For the reasons previously identified, the SA57 land is being leased to THFC on a long lease, and therefore its inclusion within the overall allocation of SA62 would be appropriate. It appears that this was already anticipated in the Allocation SA62 where the existing use was described as “Golf Course”.

In terms of the site allocation’s implementation timeframe for delivery, the policy currently suggests that this is 5-10 years. However, it would be appropriate to identify the timeframe for delivery as being 0-5 years as THFC are currently considering early enhancement of their existing facilities, including the implementation of the Western Field development (referenced in the attached Policy Designation Document – Enclosure 1) and further professional training facilities on the former Whitewebbs Golf Course site.

The modifications to the Policy are shown on the attached (Enclosure 2).

Site Allocation SA57: Whitewebbs Golf Course

The Whitewebbs Golf Course designation should be incorporated into the SA62 Site Allocation and should also be extended to include land to the west, as shown on Figure 2.2 of the attached Policy Designation Report (Enclosure 1). There are no sound reasons for the exclusion of the western part of the site, as demonstrated in the attached document.



Presently, the NELP suggests that the site should provide Nature Recovery uses (as promoted under Policies SP SS2, SP PL8, SP BG1 and SP BG3). THFC support the promotion and enhancement of biodiversity within the wider designation of Site Allocation SA62 and as such, this is legislated for within the Criterion of Policy SP CL4. There is consequently no need to specify “nature recovery” as one of the land use requirements for the allocated site.

A range of proposed changes to the allocation are shown on the attached, although it is anticipated that these will be incorporated into the comprehensive SA62 Allocation.

Summary

For the reasons outlined above and in the attached, THFC support EC’s proposed identification of their Training Ground and adjoining land as being an area of sporting excellence where further associated development will be supported in principle, subject to a range of development management criteria. Notably, the land designated for sporting excellence should be extended to incorporate the former Whitewebbs Golf Course, creating a single site-wide allocation.

Subject to some modest changes to the policies and explanatory text of the draft NELP, as shown on the attached, THFC support the overall thrust of the NELP, and the Council’s intention to provide up to date planning policy reflective of current Government policy and best planning practice.

Yours sincerely