To whom it may concern

## Draft Local Plan - Consultation Response

I am writing in relation to Enfield's Draft Local Plan.

I have recently published research which investigates the number and area of golf courses within Greater London. My work shows that there are currently 94 active golf courses within London, occupying an area greater than the whole of Brent – a total of 4.331 hectares. Seven of these courses are in Enfield.

I am fully supportive of the principle of de-designating green belt land for housing, provided that this is undertaken in a sensitive, sustainable and compact way. It is my opinion that the choice between "green fields" and "concrete" is not a binary one, as is often presented by special interest anti-development groups, but rather should be seen as an opportunity to improve access, provide enhanced biodiversity, increase areas for leisure, recreation and exercise and install new social infrastructure and housing; all whilst maintaining the integrity of open space which residents value.

Golf courses, by the nature of the game, are limited in their capacity to provide many of these things. The density of occupation of golf courses is limited by the area required to play safely: our research indicates that each individual player requires more than one hectare of land – and while some courses benefit from public rights of way running across them, deviation from these paths can be dangerous.

Most golf courses in London are protected from development by the planning status of the land on which they sit. Four of Enfield's courses lie within the green belt, the remainder are designated as Metropolitan Open Land. I believe that this designation is largely erroneous.

Under the 2021 London Plan, land to be designated as MOL should comply with at least one of the following four criteria:

- 1. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
- 2. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- 3. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value

4. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

In most cases, it cannot reasonably be claimed that golf courses meet criteria two, three and four – they neither provide facilities serving "either the whole or significant parts of London", nor do they contain features of particular heritage importance. As largely monocultural landscapes, requiring frequent maintenance and significant water use, their biodiversity contribution is limited, with wildlife habitats pushed to the perimeter of the fairways.

While some courses are distinguishable from the built-up areas around them, their frequent location within low-density suburban neighbourhoods must call into question their value in respect of the first criteria also. In any case, appropriate development could still be achieved in such a way that the integrity of these green spaces is maintained: clusters of high-density development, including housing and social infrastructure, sitting within a rewilded landscape, linked by cycleways, parkland and allotments, for instance.

Golf courses require very large areas of land. Over 328 hectares of Enfield are taken up by its seven courses – around 4% of the borough's total area. Although golf courses tend to be located away from public transport, some areas of these courses are actually very well connected. Bush Hill Park golf course, for example, is entirely within the London Plan's Policy H2 zone (ie. either 800m from a station, town centre boundary or with a PTAL of 3 or more). Around half of Enfield Golf Course's area – approximately 19 hectares – achieves the same criteria. The freehold of this course is owned by Enfield Council, yet it receives only £13,500 per annum in rent from the club which occupies it.

I believe that it is now time to question whether golf courses represent an equitable use of land when the city is under such pressure to deliver new homes, open space and social infrastructure. In addition to the proposed removal of green belt land around Crews Hill and Chase Farm, I would advocate for a thorough assessment of the golf courses within Enfield that benefit from MOL designation, and whether the residents of the borough might be better served by these pieces of land having their protection removed with a view to future development.

As a rough estimate, building homes at 60 dwellings per hectare on the H2 zone of each of Enfield's publicly-owned golf courses alone would yield homes for around 25,000 people.

You can find out more about my research at the following address:

## https://golfbelt.russellcurtis.co.uk

Please do not hesitate to contact me should you require any further information on the above.