



**Our ref:** Q230291.EIA Screening.0.1  
**Email:** [lewis.jenkins@quod.com](mailto:lewis.jenkins@quod.com)  
**Date:** 6 October 2023

Lap-Pan Chong  
Principal Planning Officer  
Development Management (Strategic Applications)  
Planning and Growth  
Enfield Council  
Silver Street  
EN1 3XE

By email

Dear Mr Chong,

## **Former Whitewebbs Park Golf Course, Enfield**

### **Request for an EIA Screening Opinion under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) – Regulation 6**

Tottenham Hotspur Football Co. Limited (the 'Applicant') intends to submit three separate but linked planning applications to redevelop land at the Former Whitewebbs Park Golf Course in the London Borough of Enfield (the 'Site'):

1. Former golf course: full planning application for the formation of the women's training centre, restoration of historic parkland and all associated works.
2. Toby Carvey car park: Full planning application for a small area of works necessary to connect the historic carriageway with the existing Toby Carvey car park.
3. Western Field: modifications to the extant Western Field planning consent to continue the operational link.

On behalf of the Applicant, we write to request an Environmental Impact Assessment ('EIA') Screening Opinion from the London Borough of Enfield Council ('LB Enfield') in accordance with Regulation 6(1) of the Town and Country Planning (EIA) Regulations 2017<sup>1</sup> (as amended<sup>2</sup>) ('EIA Regulations').

To assist LB Enfield in its adoption of a Screening Opinion, we enclose figures at Annex 1 and an EIA Screening Appraisal at Annex 2 which satisfy Regulation 6(2) as follows:

- A plan sufficient to identify the Site;

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<sup>1</sup> Her Majesty's Stationary Office (HMSO), 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. May 2017.

<sup>2</sup> HMSO, 2018. The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. November 2018.



- A description of the development, including physical characteristics of the development and, where relevant, of demolition works;
- A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- A description of the aspects of the environment likely to be significantly affected by the development;
- A description of the likely significant effects of the development on the environment resulting from expected residues and emissions and the production of waste, where relevant; and the use of natural resources, in particular soil, land, water and biodiversity; and
- Measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

## Existing Site and Setting

The Site is located off Whitewebbs Road (which becomes Whitewebbs Lane to the east of the private access road junction), approximately 3.2 km north of Enfield town centre. It extends to approximately 54 ha and is centred at National Grid Reference TQ 32694 98839. The Site is in an area of Whitewebbs Park leased from LB of Enfield which comprises a disused 18-hole golf course with two associated buildings; the locally listed 'Northern Clubhouse' and the 'Southern Clubhouse'. The golf course closed permanently in 2021. The Site includes an area of ancient woodland which is also part of Whitewebbs Park. The Site is wholly within the administrative boundary of the LB Enfield.

A Site boundary plan is provided in Annex 1 (Figure 1).

The Site is bounded by Whitewebbs Road / Whitewebbs Lane to the north, a public bridleway and site known as Dickenson's Meadow the east, Turkey Brook to the south and Whitewebbs Park woodland to the west. Access is provided via private access road off Whitewebbs Road/ Whitewebbs Lane. Annex 2 provides a more detailed description of the Site and the surrounding area.

The is also accessible by Public Rights of Way (PRoW) and permissive paths.

## Planning Context

The Site is currently unallocated within the adopted LB of Enfield Local Plan<sup>3</sup> and the new draft LB Enfield Local Plan (2021)<sup>4</sup>, and is designated as Metropolitan Green Belt.

The Site was used as a golf course since the early 1930's until it closed in 2021. The following historical applications were identified at the Site based on a search of LB of Enfield planning portal:

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<sup>3</sup> <https://www.enfield.gov.uk/services/planning/adopted-plans>

<sup>4</sup> London Borough of Enfield Draft Local Plan (June 2021)



- [OA/91/0017](#) - Change of use to sports development including golf driving range, golf cubicles, driving range, ancillary building, football pitches, tennis and associated parking/access
- [TP/96/1099](#) - Conversion of vacant stable block into a golf clubhouse involving the demolition of single storey extension, demolition of existing depot and erection of new shed for ancillary storage purposes, together with extension to existing golf course involving landscape work, formation of car parking and new access road.
- [TP/99/1463](#) - The conversion of first floor into three one-bedroom flats.
- [TP/99/1463/1](#) - The conversion of first floor into three one-bedroom flats (Renewal of unimplemented permission).
- 16/01811/FUL - Erection of a freestanding single storey Kiosk Cafe (A3).
- P12-01430LDC - Use of buildings as an office, mess room, workshop and store Approved 29th August 2012 This permission relates to the two buildings on the western part of the site.
- 15/02222/LBC - Demolition of existing extension and erection of a replacement single storey extension, including restoration and refurbishment of building Approved 5th April 2016 This permission relates to the North Lodge building itself. This is a listed building consent.
- 15/02221/FUL - Demolition of existing extension and erection of a replacement single storey extension, including restoration and refurbishment of building Approved 5th April 2016 This permission relates to the North Lodge building itself.

## Description of Development

The Applicant intends to submit three planning applications to provide a new football training centre for Tottenham Hotspur Football Club ('THFC') Women and girl's teams, as well as restoration and enhancement of historic parkland landscape for public use ('Development').

The proposals are not yet finalised and are subject to ongoing design development, however they will comprise works including the creation of training pitches with associated fencing (approximately 17.5 ha), conversion of the Northern Clubhouse to provide the main building for the football training centre, restoration and enhancement of the historic parkland landscape, renovation/partial demolition of the Southern Clubhouse to form a new café and public toilets, demolition of the existing grounds maintenance buildings, southern café and WC blocks and construction of a security lodge, gatehouse and replacement maintenance building, and new and modified vehicular and pedestrian accesses, including the reinstatement of a historic carriageway in Whitewebbs Woods. The Conduit House on Site will also be resorted to form a bird hide and bat roost.

The historic drive to Whitewebbs House in the west of the Site will provide a new access to the Toby Carvery public house as a consequence of introducing vehicular management measures on the existing access road (for future access to the Development and adjacent residential property, the Limes).



A link is proposed between the Development and the THFC Men's Training Centre to the east. This link would convert an existing lay-by that has been temporarily stopped up, to a route for Pedestrians, Equestrians and Grounds Maintenance Vehicles with a new hedge to separate this link from the highway.

## EIA Context

The Development does not fall within any of the descriptions of development listed in Schedule 1 of the EIA Regulations and is therefore not a 'Schedule 1 development'. The proposals do fall within Category 10(b) of Schedule 2 of the EIA Regulations, which is applicable to 'urban development projects'. Schedule 2 development means development of a description referred to in Column 1 of the table in Schedule 2 where:

*“a) Any part of that development is to be carried out in a sensitive area; or*

*b) Any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met in relation to that development.”*

No part of the Development is to be carried out in a 'sensitive area' as defined in Part 1 of the EIA Regulations (i.e. a Site of Special Scientific Interest, National Park, Area of Outstanding Natural Beauty, World Heritage Site, Scheduled Monument or European Site<sup>5</sup>).

The screening thresholds for Category 10(b) projects is:

*“(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*

*(ii) the development includes more than 150 dwellings; or*

*(iii) the overall area of the development exceeds 5 hectares.”*

The Development is above this threshold and therefore EIA Screening is required.

## Potential for Likely Significant Effects

The Government's online EIA guidance<sup>6</sup> for considering Schedule 2 development and the need for EIA states, *“Only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment”* (Paragraph 018). The key stage in the screening process is to consider whether the Development is *‘likely to have significant effects on the environment by virtue of factors such as nature, size or location’*. As required by Regulation 5(4)(c), where a relevant planning authority has to

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<sup>5</sup> Now known as the national Site network (NSN), as defined by the Conservation of Habitats and Species Regulations 2017 (as amended).

<sup>6</sup> Department for Levelling Up, housing and Communities and Ministry of Housing, Communities and Local Government, (2020). Environmental Impact Assessment: Guidance. Available at: <https://www.gov.uk/guidance/environmental-impact-assessment>



decide whether Schedule 2 development is EIA development, they must take into account the relevant selection criteria set out in Schedule 3.

An EIA Screening Appraisal has been prepared by EIA specialists within Quod's Environmental Planning team with input from technical specialists (Annex 2), which considers the characteristics of the Development and the potential for significant effects, including the potential for cumulative effects with other existing and approved developments. The Appraisal has had regards to the relevant criteria of Schedule 3 of the EIA Regulations and has been prepared to inform LB Enfield's screening opinion.

## Mitigation Measures

The EIA Regulations allow mitigation measures, that would avoid or prevent what might otherwise have been significant adverse environmental effects, to be taken into account by the decision maker when considering whether a development is an EIA development. A summary of standard mitigation measures considered appropriate to mitigate effects with respect to this Development is provided below.

### Construction

- Construction Environmental Management Plan (CEMP) (to be secured via a planning condition);
- Construction Traffic Management Plan (CTMP) (to be secured via a planning condition);
- Contamination site investigation and remediation strategy (if required via a planning condition).

### Design

- Design which positively contributes to the Site's setting and surroundings;
- Restoration of the historic parkland;
- Incorporation of appropriate climate change adaption measures designed to address the potential risks associated with climate change, including allowance for storm events in drainage design, use of durable materials, solar shading and glazing to avoid overheating, and renewable energy generation.
- Development of a Travel Plan;
- Surface Water Drainage Strategy including Sustainable Urban Drainage features (SuDS);
- Landscape Strategy to achieve biodiversity net gain, including retention and enhancement of habitats of highest importance, creation of more diverse grassland, additional wetland features, new tree planting (including as woodland and parkland trees) and enhancement of existing woodland;
- Sensitively designed lighting strategy in order to avoid disturbance effects; and
- Public access strategy to benefit local communities.



## Conclusion and Screening Opinion Request

Taking into account the above measures and the findings of our review of the emerging proposals, we find that the Development is unlikely to give rise to significant environmental effects and, as such, does not constitute an EIA development. We formally request LB Enfield's Screening Opinion.

As you will be aware, Regulation 5(5) requires that in their screening opinion, the local authority should state: *'the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3'*. If it is determined that proposed development is not EIA development, the local authority should also *'state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment'*.

We would be grateful if you could confirm receipt of this request and therefore the start date for the 21-day decision period and that you are satisfied you have sufficient information to make your screening opinion. Should you require any further information to prepare your screening opinion and reasons for your decision, please do not hesitate to contact me.

Yours sincerely,

Lewis Jenkins  
Associate

Encl. Annexes 1 and 2



## ANNEX 1

### Figures

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Figure 1: Site Boundary

Figure 2: Environmental Sensitivities

Figure 3: Indicative Development Layout

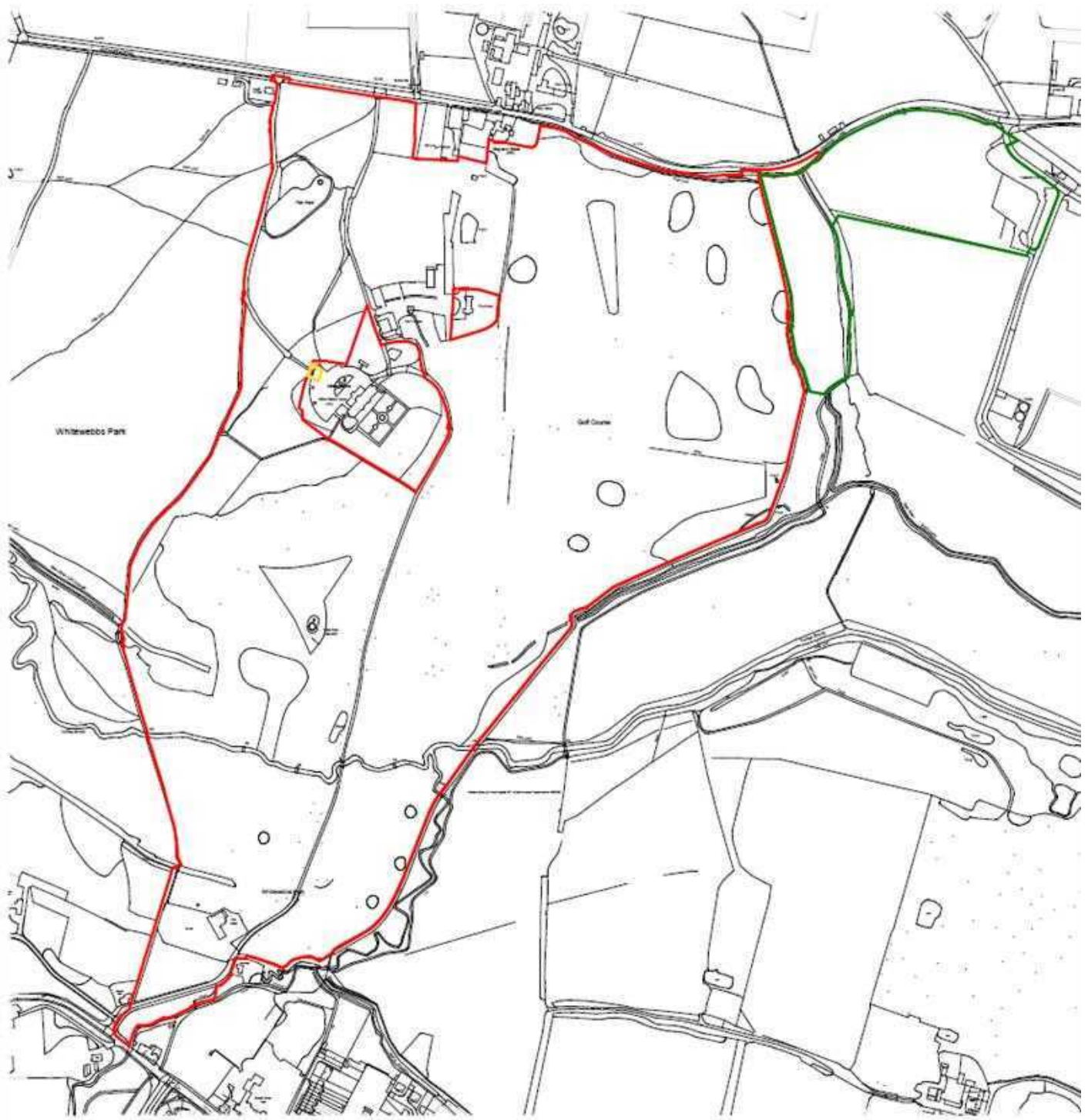
Figure 4: Phase 1 Habitat Plan

Figure 5: Photos of the Site from Various Viewpoints





Figure 1: Site Boundary Plan






-  Proposed TH Women's Training Centre Application Boundary
-  Proposed Whitewebbs House - Toby Carvery Carpark Works Application Boundary
-  Western Field Consent Boundary





Figure 2: Environmental Sensitivities

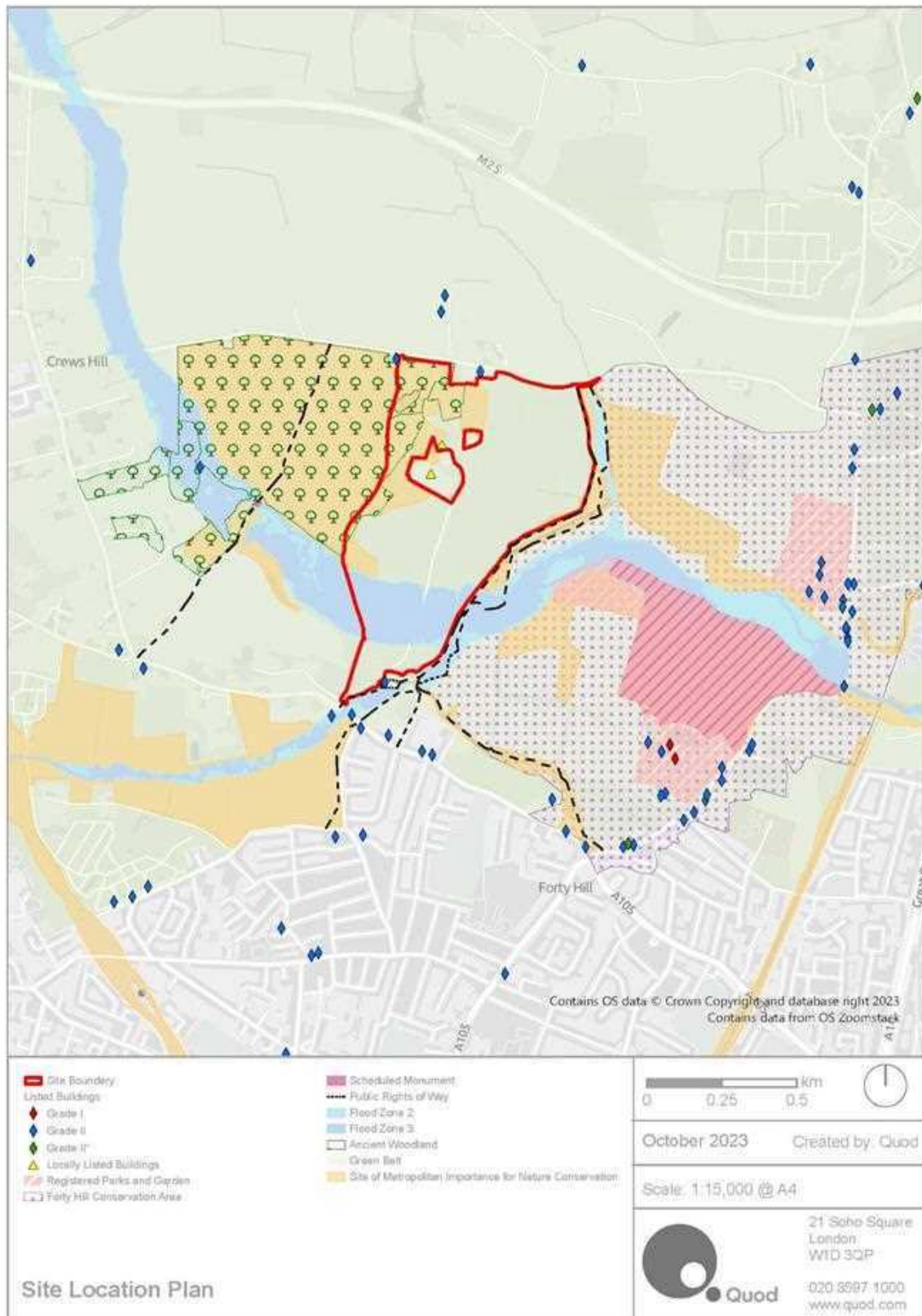




Figure 3: Indicative Development Layout Zones (Pre-Public Consultation)

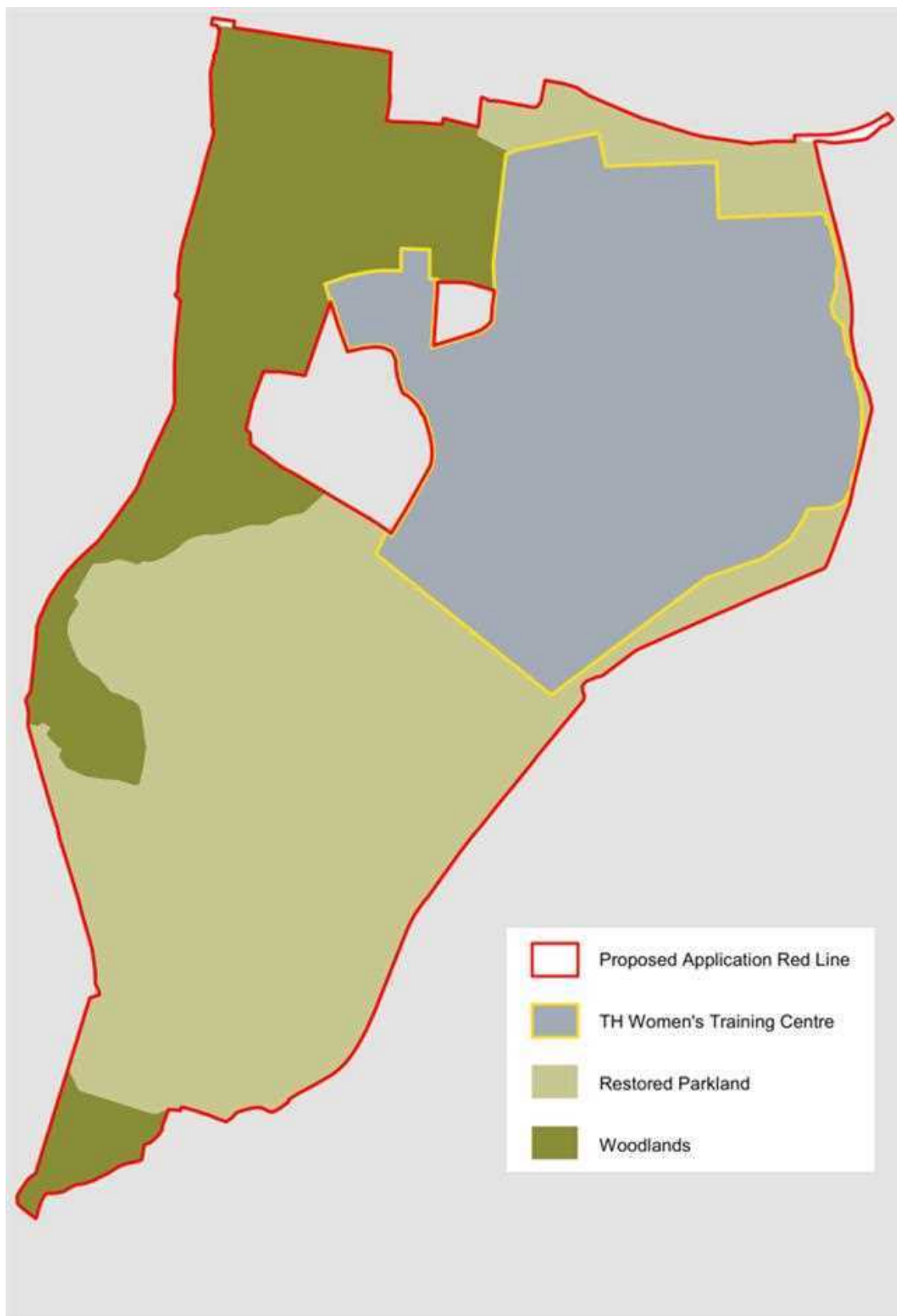


Figure 4: Phase 1 Habitat Plan

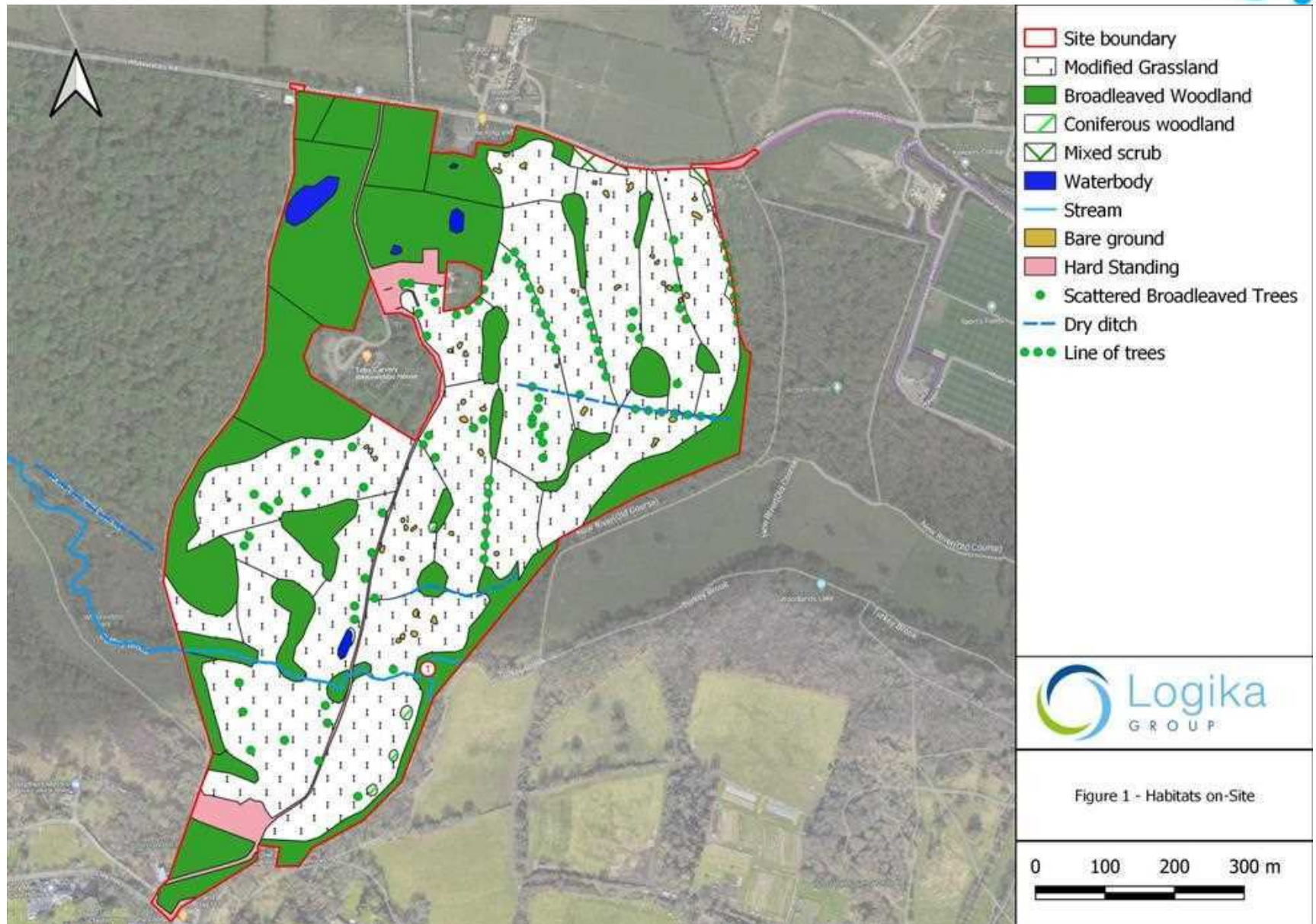




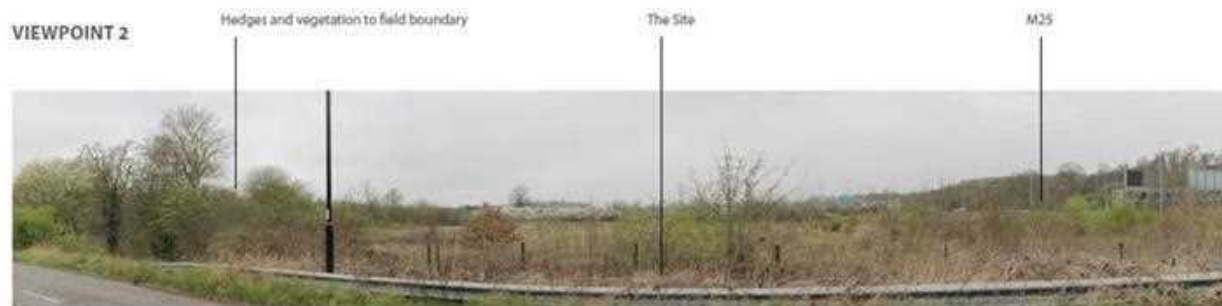


Figure 5: Photos of the Site from Viewpoints



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 34264 99966	Transport	20	40	View looking south from Bulls Cross Ride bridge over M25

This represents views from the north looking into the Site from an elevated position crossing the M25. Most views of the Site from north of the M25 are restricted due to layered vegetation and tree cover along the M25 restricting intervisibility.



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 34241 99907	Transport	4	35	Looking west into site from Bulls Cross Ride

This represents views looking west into the Site from Bulls Cross Ride. The M25 forms a dominate feature in the landscape on the norther edge of the Site, as do the electricity pylons. Note that grassland is unmanaged and includes areas of scrub and pioneer vegetation.



#### VIEWPOINT 03 : Looking west into site from Bulls Cross Ride junction with Whitewebbs Lane



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 34161 99702	Transport	740	37	Looking west into site from Bulls Cross Ride junction with Whitewebbs Lane.

This represents views from the north east looking into the Site from the junction between Whitewebbs Lane and Bulls Cross Ride. The flat topography and high hedging along Whitewebbs Lane prevents any views towards the golf course.

#### VIEWPOINT 04 : Looking south towards the Whitewebbs Golf Course from Public Right of Way



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 33304 99751	Recreational	1	41	Looking south towards the Whitewebbs Golf Course from Public Right of Way

This represents views from walkers of the Public Right of Way along the boundary to Whitewebbs Golf Course to the north east. Gaps in boundary vegetation and the low fencing allow far reaching views across the golf course with individual and stands of specimen trees forming prominent landscape features.



#### VIEWPOINT 05 : Looking south towards the Whitewebbs site from Public Right of Way



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TL 33080 00015	Recreational	740	52	Looking south towards the site from Public Right of Way

This represents views from the footpath to the north of the site. Development associated with Guy Lodge farm obscures views towards the site

#### VIEWPOINT 06 : Looking east from edge of Whitewebbs House garden boundary



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 32957 99417	Recreational	0	43	Looking west from edge of Whitewebbs House garden boundary

This represents views from the footpath along the garden boundary to Whitewebbs House, towards the centre of the Whitewebbs Park and Golf course site. There are open views across the golf course landscape.





**VIEWPOINT 07 : Looking east towards the Whitewebbs site from Public Right of Way**



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 32039 99029	Recreational	590	49	Looking east towards the Whitewebbs site from Public Right of Way

This represents views from the footpath to the south west Whitewebbs Park and Golf course site. Whitewebbs Wood and the large number of parkland trees gives a heavily treed character and limits views of open areas within the site. The historic coniferous Wellingtonia trees are recognisable and prominent features of the landscape within this view.

**VIEWPOINT 08: Looking north towards Whitewebbs Golf Course from Public Right of Way**



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 32816 98807	Recreational	0	35	Looking north towards Whitewebbs Golf Course from Public Right of Way

This represents views from the Public Right of Way on the southern edge of Whitewebbs Park looking north west across the historic parkland and current golf course. Historic parkland tree planting including impressive Wellingtonia trees can be seen and the large swathes of mown grass provide an open character. However long range interconnecting views are prevented by individual specimen trees and the large areas of woodland that surround the parkland.



#### VIEWPOINT 09 : Looking north west towards Whitewebbs Golf Course from Forty Hall Estate



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 33683 98531	Recreational	840	50	Looking north west towards Whitewebbs Golf Course from Forty Hall Museum

This represents views from within Forty Hall Estate which has public access and trails. Views towards the site are prevented by mature trees and woodland within the Forty Hall Estate.

#### VIEWPOINT 10 : Looking north west towards Whitewebbs Golf Course from Public Right of Way to the south of Dickenson's Meadow



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 33445 99360	Recreational	15	30	Looking west towards Whitewebbs Golf Course from Public Right of Way to the south of Dickenson's Meadow.

Existing trees prevent views into site from Public Right of Way



**VIEWPOINT 11: Looking east from Scheduled Ancient Monument (Flash Lane Aqueduct)**



GRID REFERENCE	RECEPTOR TYPE	DISTANCE FROM APPLICATION SITE (m)	ELEVATION (m AOD)	DESCRIPTION
TQ 32308 99380	Recreational	430	35	Looking east towards Whitewebbs Golf Course from footbridge over Flash Lane Aqueduct

Existing mature tree cover prevents any views to the site from the scheduled ancient monument



## ANNEX 2

# EIA Screening Appraisal: Former Whitewebbs Park Golf Course, Enfield

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Schedule 3 of the EIA Regulations sets out selection criteria that should be considered, including the characteristics of the development, its location, the type and characteristics of the potential impacts and the possibility of effectively reducing the impact. This Annex provides an appraisal of the Development with reference to these criteria.

### a. Site Location and Description

The Site is located off Whitewebbs Road/ Whitewebbs Lane, which is approximately 3.2 km<sup>7</sup> north of Enfield town centre. It covers an area of 54 hectares ('ha') and is centred at National Grid Reference TQ 330 994 (Annex 1, Figure 1). The Site is within an area of Whitewebbs Park which will be leased from LB of Enfield and comprises a disused 18-hole golf course with two associated club houses; the locally listed 'Northern Clubhouse' and the 'Southern Clubhouse' which used to be a café. The golf course closed in 2021.

The Site gradient slopes downwards towards Cuffley Brook, which traverses west-east across the southern extent of the Site. The downward gradient is less pronounced in the north of the Site but becomes more pronounced towards the centre of the Site. The Site also slopes downward in the east of the Site towards the New River (Old Course) and Turkey Brook.

The golf course has mostly been left unmanaged since its closure, and what were once heavily managed greens and fairways are now neutral semi-improved grassland. The former golf course is surrounded by younger and denser woodland and dense scrub in the east and in the west is a mature ancient woodland. Across the golf course areas that were once bunkers remain un-vegetated. Buildings on Site include the Northern Clubhouse in the north west of the Site, this is a two storey locally listed building to be retained as part of the proposal. Adjacent to the Northern Clubhouse is the maintenance building and an area of hardstanding primarily used and to be retained as carparking. The Southern Clubhouse is located in the south of the Site boundary, this includes a smaller two storey buildings and associated hardstanding and carparking.

The Site can be accessed from a private road via a junction on Whitewebbs Road/ Whitewebbs Lane, which runs centrally through the Site leading to Whitewebbs House (currently used as a Toby Carvery restaurant/pub and out with the Site) and the Northern Clubhouse. The Southern Clubhouse is

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<sup>7</sup> All distances are taken from the Site boundary





accessed via Beggars Hollow onto Clay Hill on the south Site boundary. The Site can also be accessed via a number of Public Rights of Way (PRoW) and permissive paths.

The closest existing residential receptors, The Limes housing complex, are situated along the private access road adjacent to the Site boundary and the King and Tinker pub is adjacent to the northern Site boundary. Other close by receptors include Whitewebbs Farm 170m north and Guy Lodge Farm less than 30m north.

The Site is located in a semi-rural setting. To the north, the Site is bounded by Whitewebbs Road/ Whitewebbs Lane, beyond which is Whitewebbs Farm, Guy Lodge Farm and agricultural fields bound by the M25 road (approximately 550m north of the Site Boundary). To the east, the Site is bound by the New River (old course), Dickinsons Meadow, which is currently under construction (approved under 17/01178/FUL) for ecological enhancement and Archers Wood, a public park used for recreational purposes.

Beyond Archers Wood is the existing THFC Training Centre and associated pitches, approximately 260m east. To the south, the Site is bound by Turkey Brook. Further south are strips of broadleaved woodland/ pasture associated with the Forty Hall Country Park and owned by Forty Hall estate (770m south east), and the urban/residential areas of Clay Hill (approximately 500m south) and Chase Side (approximately 1.5km south). To the west, the Site is bound by further woodland and pasture associated with Whitewebbs Park.

### Environmental Sensitivities

Environmental sensitivities are illustrated on Figure 2, Annex 1.

The Site is not located within a 'sensitive area' (as defined in Part 1 of the EIA Regulations) (i.e. a Site of Special Scientific Interest, National Park, Area of Outstanding Natural Beauty, World Heritage Site, Scheduled Monument or European Site).

The Site partially overlaps with Whitewebbs Wood Site of Importance for Nature Conservation (SINC), which is of Metropolitan importance and designated for ancient woodland, notable flora, breeding avifauna and great crested newt. Forty Hall Park Estate SINC (Metropolitan importance) lies adjacent to the eastern boundary of the Site and supports a range of notable habitats (hedgerows, secondary woodland, veteran trees) and a range of legally protected and notable species including stag beetle. A further SINC, Hilly Fields Country Park lies close to the southern boundary of the Site on the other side of Clay Hill.

The closest statutory ecologically designated Sites are the Chingford Reservoirs (SSSI) approximately 4km east of the Site boundary and the Waltham Abbey (SSSI)/ Lee Valley Ramsar approximately 4km north east of the Site boundary.

The closest Scheduled Monuments are the 'Flash Lane Aqueduct' and 'Elsyng Palace' which are approximately 290m west and 190m east of the Site, respectively. Within the Site boundary is the locally listed Northern Clubhouse and Southern Clubhouse (to be retained as part of the redevelopment). Listed buildings adjacent to the Site, include the locally listed Whitewebbs House in the centre of the Site 70m from the Site boundary (although outside the red line boundary), the Grade



11 South Lodge is adjacent (5m east) to the south Site boundary, the Grade II listed 'The King and Tinker Public house' (21m) and 'North Lodge' (16m) are adjacent to the north of the Site boundary.

The Site is not within a Conservation Area (CA). Directly adjacent to the east of the Site is the Forty Hall CA. There are no Registered Parks and Gardens (RPG) on Site. The nearest are the Forty Hall RPG and the Myddleton House RPG which are located approximately 174m east and 680m east of the Site, respectively.

The Site lies within the 'Whitewebbs Hill, Bulls Cross and Forty Hill' Archaeological Priority Area.

The majority of Site is within Flood Zone 1 and therefore at low risk of flooding. Areas to the south of the Site, close to Turkey and Cuffley Brooks are within Flood Zone 2 and 3.

The Site is wholly situated within an Air Quality Management Area (AQMA), designated for exceedances in the annual mean nitrogen dioxide (NO<sub>2</sub>) objective and daily mean Particulate Matter (PM<sub>10</sub>) concentrations within the LB Enfield.

## **b. Size and Design of the Development**

A Training Centre for the Women & Girls' Football Academy will be provided in a modified and extended Northern Clubhouse and will include the following facilities:

- Seven full size grass pitches and two half size grass pitches;
- An artificial surface pitch;
- Floodlighting for one grass pitch and the artificial surface pitch;
- A Sports Academy for grassroots and community coaching that will administer and deliver a wide range of courses on Site, via external teaching partners;
- The refurbishment of the Northern Clubhouse that will provide in the order of 3,000 sqm of floorspace and include office space, medical facilities, changing rooms and washing facilities, classrooms; and
- Car parking (100 parking spaces with eight accessible), cycle parking and drop off/pickup area.

The Southern Clubhouse will be renovated to include a café and WCs to serve the visitors to Whitewebbs Park.

The existing northern Grounds Maintenance Building will be demolished. The southern café and WC blocks will be demolished and rebuilt.

A new Grounds Maintenance Building will be built in the north east of the Site, providing changing rooms, WCs, office and workshop space. This will also house the proposed Turf Academy, to be run by THFC.

A new security lodge will also be built providing WCs, kitchenette, and security room.





Vehicular access improvements are also proposed with the addition of a new internal access route to the existing THFC training centre and an improved route from Whitewebbs Road/ Whitewebbs Lane to Whitewebbs House (Toby Carvery) along an existing historic drive.

A link is proposed between the Development and the THFC Training Centre to the east. This link would convert an existing lay-by that has been temporarily stopped up, to a route for Pedestrians and Grounds Maintenance Vehicles with a new hedge to separate this link from the highway.

Existing woodland would be retained and enhanced with new woodland planting that would include diverse native woodland shrub species such as hazel, hawthorn, holly and dogwood along with native locally prevalent woodland ferns, wildflowers and bulbs. There will also be public access and landscape improvements, with existing paths to be managed and extended.

The Conduit House in the north west of the Site will be restored and converted into a bird hide and bat roost.

Areas of historical parkland on the southern part of the Site of former golf course would be restored with wildflower meadows and new tree planting/layout informed by historical mapping from 1842. Unnatural features such as bunkers and non-native conifer planting would be removed and replaced with traditional native England parkland trees such as English Oak, Hornbeam and Common Beech. Some sand bunkers will be retained as habitat features within the Site. There will also be the addition of a network of public access routes across the park.

The Development would take two years to complete and is anticipated works will start in mid-2024, subject to planning permission.

### **c. Use of Natural Resources and Production of Waste**

The Development would, by its very nature, require the use of a range of natural and man-made construction materials to complete the build and fit-out of the scheme. Demolition of the Grounds Maintenance Building, southern café and WC blocks would generate some waste.

Opportunities to minimise volumes of waste going to landfill would be sought by the contractors in-line with good site practice, so that construction materials are used efficiently on-site and that wastes are recovered, re-used or recycled where practicable. Re-use of surplus material will be dependent on it meeting relevant specification requirements and being inert and not contaminated. The use of natural materials such as ply and timber will be kept to a minimum. The removal of wastes during the demolition and construction phase may lead to some indirect localised temporary effects, e.g. disruption on the road network for other road users, dust and noise, but is not considered to be significant.

Given the nature of operations and the relatively small area of additional buildings, as well as the incorporation of energy and resource efficient fittings, it is expected that the operational consumption of energy, water and other natural resources by the Development would not be significant. Energy and water efficiency measures and/or water intensive activities will be managed appropriately through design and consultation with the statutory utility providers to avoid any adverse impacts on their



capacity to provide services. Therefore, it is considered unlikely that the Development will result in significant effects relating to the use of natural resources.

The completed Development would generate various waste streams, none of which would be hazardous or likely to give rise to significant effects. The Development will provide the necessary waste requirements based on BS 5095: 2005 and in line with LB Enfield's waste and recycling storage requirements. The waste strategy for the Development would be described in the Design and Access Statement.

Overall, it is expected that the operational consumption of energy, water and other natural resources by the Development would be low and would give rise to significant environmental effects.

#### **d. Socio-Economics**

The Development will include a football academy for women and girls that will provide a grassroots and community facility. The Development is likely to generate the following socio-economic effects:

- Direct beneficial employment effects associated with temporary job opportunities during the construction phase – it is not considered that this Development would generate a significant amount of employment within the construction sector;
- Direct beneficial employment effects associated with the generation of end-use job opportunities at the operational phase, including playing staff, training/coaching staff, sports science roles and career development within the Turf Academy, amongst others;
- Indirect local economic effects associated with spending by the additional employees; and
- Direct beneficial social value effects for the local community associated with the Sport's Academy.

Whilst the effects will be beneficial, in the context of existing district and regional employment levels, these effects are not likely to be significant. There are likely to be no significant adverse socio-economic effects and therefore no mitigation is required.

#### **e. Pollution and Nuisances**

##### **Transport and Access**

Whitewebbs Road/Whitewebbs Lane forms the vehicular access point on the northern Site boundary and provides current access to the Northern Clubhouse. The Southern Clubhouse is accessed via Beggars Hollow onto Clay Hill on the south Site boundary.

The Site does not benefit from bus or rail services in the immediate vicinity so those using public transport need to walk or get a taxi/shuttle from Turkey Street Station (1.9km east of the Site boundary) which serves the London Liverpool Street to Hertford line. Services operate every day of the week every 30 minutes between Cheshunt and Liverpool Street. Further local stations include Enfield Town (trains to Liverpool Street Station) 2.5km south of the Site, Crews Hill (trains between London Kings Cross and Letchworth) 1.9km north west, Oakwood and Cockfosters underground stations >5km south west, both located on the Piccadilly Line. There are two main bus services running on the A10



(closest stop being 1.4km east of Site) offering a frequent service to Waltham Cross and to the south to Enfield and Wood Green. 250m to the south there is the 456 bus service running through Clay Hill with two buses an hour serving Enfield and Crews Hill. Overall, the Site has a Public Transport Accessibility Level (PTAL) rating of 0.

Construction traffic effects are not expected to be significant. Construction traffic routes, movements and associated effects such as driver disruption, dust and dirt nuisances would be dealt with through standard and widely used management measures which would be secured by the CEMP (secured via a planning condition). The net change in Heavy Goods Vehicles ('HGVs') and light vehicular traffic flows on the local road network during construction of the Development is not expected to be significant in the context of existing traffic flows on the surrounding highways. This is due to the scale of the Development and relative ease of access onto the strategic road network. An outline Construction Logistics Plan will support the planning application to be controlled via a planning condition.

During operation, the Development would lead to an increase in road traffic accessing the Site compared to the existing baseline. The daily trip forecasts based on this method gives a daily two-way flow of 355 vehicles (of which 2% are HGVs) with around 30 vehicles per hour peaking at 60 two way movements in the PM peak hour. The volume of trips expected are based on the existing trip profiles at the existing THFC Training Centre to the east. As the floor area of the proposed buildings are less than half the size of the existing THFC Training Centre a proportion has been applied to give the reasonable forecast of those proposed trips.

Robust preliminary peak hour traffic models of the junction of Whitewebbs Road/ Whitewebbs Lane have been prepared and shows that the access junction will continue to operate well within capacity once the operation of the Women and Girl's Training Centre is up and running. This means that there will be minimal queues or delays developing at the access at peak times and no prospect of queueing onto the highway.

It is proposed to provide a new access route to Whitewebbs House (Toby Carvery) from Whitewebbs Road/Whitewebbs Lane along the existing historic drive. The construction approach would seek to restrict works to previously disturbed ground to avoid impacts to trees within the ancient woodland. Some repair to the surfacing and new kerb edging would be required. The volume of traffic using this route would be limited to the Toby Carvery traffic which attracts on average 290 vehicles per day or around 20 vehicle an hour peaking with 35 vehicles accessing the Site between 19.00 and 20.00.

A highway a link is proposed between the Development and the THFC Training Centre to the east allowing smaller internal vehicles to pass between the two areas without impacting the public highway. This link would convert an existing lay-by that has been temporarily stopped up, to a route for Pedestrians and small internal vehicles such as golf buggies with a new hedge to separate this link from the highway.

The proposal also includes upgrades to and investment in the statutory footpaths and bridleways for use by walkers, cyclists and horse riders. For example, damaged timber fencing will be repaired,



wayfinding and information signage will be improved, and the Club will seek to convert the permissive path within its leased land to a statutory bridleway.

The Permissive Paths will become Public Rights of Way providing them with a statutory basis. With this change and improvement there is an increase in the length of these routes by an extra 622m to 2940m through the demise of the Site.

As the use of the Southern Clubhouse for café and WCs for public visitors and the visitor car parking will be maintained, this part of the Development is not expected to result in any notable change in traffic movements to the south of the Site via Beggars Hollow.

A Travel Plan will include a sustainable access strategy for the Development that will propose shuttle buses, car sharing schemes, electric car provision and cycle parking. The Development will also implement strategies for car park and servicing management, and these would be set out in the Transport Assessment accompanying the planning application, with details subject to approval by LB Enfield and secured via an appropriately worded planning condition. The servicing management strategy will ensure that servicing requirements are undertaken outside of sensitive time periods for both traffic and pedestrians.

The planning application will be supported by a Transport Assessment which will assess the existing conditions of the local area and the proposed changes brought forward by the Development. It will also take into consideration residual traffic resultant from the nearby committed developments.

As such, it is not considered that there will be significant traffic and transport effects as a result of construction works or operation of the Development.

### Noise and Vibration

The Site is in a semi-rural area, with agricultural fields to the north and residential estates further south. The ambient noise and vibration environment is primarily influenced by road traffic sources from the adjacent Whitewebbs Road/ Whitewebbs Lane, as well as the M25 which is 550m north of the Site boundary. The closest existing receptors are the Limes housing complex situated along the access road adjacent to the Site boundary, Whitewebbs House (Toby Carvery) in the centre of the Site, South Lodge adjacent to the south Site boundary, 'The King and Tinker Public house' adjacent to the north of the Site boundary, Whitewebbs Farm 170m north and Guy Lodge Farm <30m north.

The Development is unlikely to result in significant noise or vibration effects on nearby sensitive receptors (including future receptors).

There is likely to be temporary short term increases in noise during the construction works, including noise resulting from construction plant and vehicles. Noise sources will be controlled by industry standard good practice measures including acoustic screening / Site hoardings, the selection of appropriate construction techniques and the restricted operation of certain plant and activities to agreed hours. These measures will be controlled via the CEMP. HGVs accessing / egressing the Site have the potential to cause highly localised vibration effects, however these effects are not expected to be significant at the sensitive receptors.



There is potential for noise effects from operations on-Site once the Development is completed, such as noise from operational activities, vehicle movements and delivery and servicing. However, with retention of tree planting on the Site boundaries and additional proposed landscaping and planting, noise emissions from the completed Development would be buffered from the existing sensitive receptors. A Travel Plan would be in place to reduce private vehicle trips, coordinate the shuttle bus service, and implement noise mitigation. Mitigation would include measures such as restricting the use of reversing beepers, PA systems and the switching-off of engines. To reduce the potential noise impacts from grounds maintenance vehicles on the highway a link is proposed between the Development and the THFC Training Centre to the east. Therefore, it is considered unlikely that the Development would give rise to any significant effects on local noise sensitive receptors.

The Development will not deliver substantial operational plant rooms. Where provided, operational plant noise will be limited to acceptable thresholds in line with LB Enfield standards and located away from sensitive receptors towards the centre of the Site as far as practicable. Significant effects on receptors from building services plant are readily controllable through careful selection of plant and design (for example locating away from properties and localised screening). Details of acoustic specifications for all fixed plant and machinery would be agreed with LB Enfield as a planning condition, if required. With careful plant design and rating level control measures in place, effects from building services plant would not be significant.

Due to its location and proposed end use, it is considered unlikely that the Development will result in significant vibration effects.

As such, it is not considered that there will be significant noise and vibration effects as a result of construction works or operation of the Development.

The planning application would however be accompanied by a Noise Assessment.

### Air Quality and Odour

A change in traffic flows associated with the Development has the potential to affect local air quality as does temporary dust effects generated by construction activities and vehicles. The Site is located within the LB Enfield Borough-wide AQMA, declared due to exceedances in annual mean nitrogen dioxide (NO<sub>2</sub>) and daily mean particulate matter (PM<sub>10</sub>). The principal air pollutants of concern with respect to the Development will be NO<sub>2</sub> and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The closest sensitive receptors which may be potentially affected by the Development include residential receptors further situated along the access road on Whitewebbs Lane adjacent to the Site boundary and The Limes. Other close by receptors include Whitewebbs Farm 170m north and Guy Lodge Farm <30m north.

No significant effects during the construction phase are expected. During the construction works, the greatest potential air quality effects relate to dust nuisance. With the implementation of good practice measures set out in the CEMP (secured via a planning condition) to minimise and control dust at source during construction, effects are unlikely to be significant. These will be detailed through the use of method statements and include measures such as hoarding, water suppression and covering of transport vehicles. Method statements will be based on industry standard guidance published by the Institute of Air Quality Management.



Construction plant and equipment used for construction works will be modern and compliant with current EU emissions standards and as such, exhaust emissions during construction works are not expected to give rise to significant adverse effects. These measures will be set out in the CEMP secured via a planning condition.

Road traffic generated by the completed Development would result in emissions of nitrogen oxides (NO<sub>x</sub>) and particulates and may therefore impact local air quality. However, the number of estimated vehicle trips for the Development are expected to be relatively low (see '*Transport and Access*' section above and EV parking provision would be provided in accordance with local policy. In addition, the vast majority of this traffic will be light vehicles due to the nature of the Development. Therefore, emissions from vehicles accessing the Development are not expected to give rise to significant air quality effects at nearby residential receptors or in the AQMA.

There are no sources of odour within or in close proximity to the Site that could affect future occupiers of the Development. The nature of the Development is such that it would not be likely to release a significant level of pollutants or any hazardous, toxic or noxious substances into the air. Emissions from plant would be dealt with by standard measures and conditions.

A standalone Air Quality Assessment will be undertaken and submitted with the planning application. The Air Quality Assessment will inform any necessary design mitigation will be incorporated into the Development to ensure that residents are protected from poor air quality.

### Ground Conditions and Contamination

British Geological Survey (BGS) maps for the area show the Site is predominantly underlain by bedrock geology of the London Clay Formation (classified by the Environment Agency as an Unproductive Stratum). There are superficial deposits (classified as Secondary A Aquifers) running centrally through the Site of sand and gravel and in the south of the Site formed of clay, silt, sand and gravel.

A review of the historical uses of the Site did not identify any significant potentially contaminative land uses. Made Ground likely to be present at the Site would be as a result of the construction of features associated with the former golf course and the infilling of the former New River (Old Course).

The risk to receptors (namely human health and controlled waters (see *Water Resources, Flood Risk and Drainage* section below)) is considered to be low and there would be no likely significant effects related to ground conditions or contamination from the completed Development.

A geotechnical ground investigation will be carried out to inform elements of the design proposals. It will include geo-environmental analysis/assessment as part of this investigation to confirm the conclusions of the preliminary risk assessment. This will include the targeting of the potential sources of contamination identified and assessment of the persistence of any fertilisers, herbicides and/or pesticides associated with the former golf course that may prove phytotoxic to any future parkland restoration. This geo-environmental sampling will also be used to inform the potential re-use of Site won material as part of any cut/fill proposals and off-Site disposal of soils, where considered





necessary. Any remediation identified by the ground investigation as being required will be secured through the remedial strategy and completed during the construction phase.

Construction of the Development will be undertaken in line with standard practice and legislative requirements to ensure appropriate management of contamination and UXO risks and minimise pollution risks to controlled waters (i.e. the adjacent Turkey and Cuffley Brook) and to human health of construction workers. These measures will be secured through the CEMP (secured via a planning condition).

### Water Resources, Flood Risk and Drainage

Turkey Brook runs adjacent to the south eastern boundary of the Site, and Cuffley Brook runs through the central/southern part of the Site. The majority of the Site is located within Flood Zone 1 and is therefore at a low risk of fluvial flooding. Areas of Flood Zone 2 and 3 lie adjacent to the existing Brooks, which are subject to a medium to high risk of fluvial flooding. The Environment Agency's hydraulic model has also been obtained, to confirm the fluvial flood extent in the 1 in 100 year plus climate change event (i.e. the design flood extent). All proposed pitches and infrastructure are located within Flood Zone 1, and outside of the 1 in 100 year plus climate change extent.

The Site is predominantly at a very low risk of surface water flooding with few areas of medium to high risk. The Site is not located within an area at risk of reservoir flooding.

The Site is indicated to be located in a Zone 2 groundwater Source Protection Zone (SPZ), associated with potable water abstractions, located from approximately 1kmm to the east/south-east of the Site. These abstractions are from the deeper White Chalk Subgroup Principal Aquifer. The groundwater within the Chalk is not considered likely to be in hydraulic continuity with the groundwater beneath the Site given the presence of the London Clay, which acts an impermeable layer.

The Development is not likely to result in any significant water quality effects during construction. Potential risks to the Turkey Brook and Cuffley Brook during construction will be controlled through standard measures during construction. These measures will form part of the CEMP (secured via a planning condition) and may include measures such as bunding of storage areas and good Site management.

No significant effects on water resources, flood risk and drainage are anticipated during operation of the Development. SuDS measures will restrict surface water discharge and ensure the Development does not increase flood risk elsewhere. In accordance with the National Planning Policy Framework (NPPF), the surface water drainage system will be designed to accommodate rainfall run-off within the Site up to and including the 1 in 100 year critical event with an allowance for climate change. Attenuation will be provided in a number of ways to contain the balance of flows on-Site and will form part of the SuDS techniques employed on-Site. These are likely to include permeable paving, swales and attenuation tanks, subject to detailed design, and will lead to an improvement in surface water flood risk and drainage across the Site relative to the existing situation. It will also seek to implement beneficial water quality treatment measures.

The completed Development will lead to an increased demand for potable water and foul water discharge as a consequence of the new uses. In accordance with local policy, water conservation



measures will be incorporated. These may include such features as rainwater harvesting, reduced flow taps, smaller cistern sizes and the use of rainwater or grey water for toilets.

A Flood Risk Assessment, including surface and foul water drainage strategies will be prepared in line with NPPF and LB of Enfield requirements and will accompany the planning application.

## **f. Archaeology**

In terms of relevant, nationally significant designated heritage assets, no World Heritage Sites, Scheduled Monuments, Historic Wrecks or Historic Battlefields lie within the study Site or its immediate vicinity.

Nationally significant Scheduled Monument designations comprising the Flash Lane Aqueduct lies c.290m to the southwest from the nearest study Site boundary, and the western boundary of the Scheduled extent of Elsyng Palace lies c.190m to the southeast of the nearest study Site boundary. The Flash Lane Aqueduct is hidden within woodland away from the Site, with no intervisibility between them, whilst the western edge of Elsyng Palace is hidden from the Site by the natural topography and wooded areas. In terms of relevant local designations, the Site lies within the 'Whitewebbs Hill, Bulls Cross and Forty Hill' Archaeological Priority Area, as defined by the LB of Enfield and their archaeological planning advisors at the Greater London Archaeological Advisory Service (GLAAS). The southern area of the Site can be considered likely to have an archaeological potential for the prehistoric periods, particularly the Bronze Age and Iron Age; the wider Site can be considered likely to have an archaeological potential for the Medieval, Post Medieval and Modern periods, for remains considered most likely to be of local (i.e. low) significance. The Site has largely remained as open land and woodland throughout its documented history, with the golf course being laid out across the open areas from the early 1930s, until closure in 2021. Principal post depositional impacts are considered likely to be focussed on the creation of the former golf course, together with previous agricultural/horticultural activity.

The Site is not located in an Archaeological Priority Area. Nevertheless, a desk-based archaeological assessment would be undertaken as part of any future planning application to consider the archaeological potential of the Site and the potential for any impacts as a result of development of the plot.

In view of the scale of the study site, and the extent of open land contained within it, together with the perceived archaeological potential, and in line with relevant planning policy and guidance, it is anticipated that the planning authorities archaeological planning advisors will require further archaeological mitigation measures in association with redevelopment impacts.

The available information indicates that in accordance with the National Planning Policy Framework (NPPF), and proportionate to the impact of development, these works can follow the granting of planning consent, secured by an appropriate archaeological planning condition.

As remains of national/international significance are not anticipated at the site, and as mitigation of development impact can be controlled via the planning process through the addition of relevant



planning condition(s) to the granting of planning consent, it is considered that significant effects on buried archaeology are unlikely.

### **g. Built Heritage**

The Site is not in a Conservation Area or Registered Park and Garden. It adjoins the Forty Hall CA to the east, which is designated for its long history of occupation back to medieval times, the presence of three historic country estates, extensive open land and the relative absence of modern development. The Forty Hall RPG and Myddelton House RPGs are 174m and 665m respectively east of the Site boundary. These assets are separated from views of the Site by substantial woodland blocks on high ground.

There are three Grade II listed buildings located in close proximity to the Site boundary; North and South Lodge and the King and Tinker Public House. North and South Lodges are Victorian gothic gate lodges located at either end of the historic drive to Whitewebbs House (Toby Carvery). The King and Tinker Pub is located along Whitewebbs Road/ Whitewebbs Lane to the north of the Site. The boundaries of the Site are heavily wooded preventing views to and from the assets along Whitewebbs Road/Lane. The setting of South Lodge is wooded and partly open onto the southern parkland, where the distance, topography and trees prevent inter-visibility with the main Site and where its setting incorporates the associated parkland enhancements and the proposed improvements to the Southern Clubhouse and carpark.

The Northern Clubhouse, Garden Walls, Conduit House and Whitewebbs Park have been designated by Enfield Council as Local Heritage Assets within the Site and Whitewebbs House is also a Local Heritage Asset located in close proximity. The purpose of their local designation is to preserve the assets, which is an integral part of the plan proposals. The Southern Clubhouse has been included in the assessment as an undesignated heritage asset which is also to be conserved.

The Northern Clubhouse will be conserved and modified to remove unsympathetic changes, with a high quality extension sensitively reflecting the historic layout of a previous range at the rear and improvements to the carpark and remains of Garden walls.

The Southern Clubhouse will be conserved with improvements to its setting by the removal of poor quality ad-hoc buildings and modifications to the associated car park.

The Conduit House will be conserved, and its walls and roof reinstated. A community and ecological use as bird hide is proposed to ensure its ongoing survival.

The development is primarily located within the least significant and least original part of the local asset Whitewebbs Park, as well as the area intentionally screened in the past. The proposals acknowledge that the original C18/C19 parkland did not extend northwards beyond the former stables/farmstead and the eastern terrace has been significantly modified and has no intervisibility. As part of the scheme, it is proposed to restore a major part of the landscape of the late C18/C19 parkland which will better reflect the significance and setting of the historic assets than does the former golf course of the 1930s and 1950s. The historic tree groupings and significant elements of the earliest



mapped landscape are to be reinstated, along with planting more appropriate to the water meadows which are significant elements retained from the pre-parkland landscape.

The proposed restoration includes reinstating the historic carriageway linking North Lodge to Whitewebbs House, together with the restoration of other historic features such as the locally important Conduit House and pond along the route.

The effect of a development on the cultural heritage resource is not considered significant when the impact does not substantially diminish or enhance the heritage interest of the cultural heritage resource. Based on the nature and scope of the Development in the context of their significance, the previous uses at the Site, the degree of inter-visibility between the heritage assets and the Site, taking into consideration intervening tree cover; and the significance of the relevant heritage assets and their setting, it is not considered there would be a significant environmental effect on built heritage assets from the construction or operation stages.

#### **h. Landscape and Visual Impact**

The Site is open in character, especially along the previous golf course fairways. Large areas of woodland to both east and west and substantial clumps of tree planting within the park restrict views out towards the wider landscape. The topography of the land generally falls from a high point in the north west to the south east, however, is broadly flat. The immediate environment surrounding the Site is one of low scale buildings and agricultural fields.

The Site lies within the Northern Thames Basin National Character Area (NCA), this area is characterised by layers of thick clay important to the retention of ancient woodland, wood pasture and pollarded veteran trees, remnant lowland heathlands, diverse landscape with river valleys, reservoirs and springs, parklands, small villages and brick-built dwellings. Key opportunities within the NCA are the conservation and management of riparian landscapes and habitats, creating better access, restoration of connectivity and conservation of historic woodland.

The Site falls into two landscape classifications within the Local Landscape Character (LLC) of Enfield. The first being rural green space formed by Whitewebbs Park, Forty Hall and Theobolds Estate South, these are characterised by historic parkland with substantial areas of ancient woodland and semi-natural woodland and farmland ridge and valleys, with attractive undulating agricultural landscape which is sparsely populated.

The Site is largely screened due to the relatively flat topography and presence of mature woodland, boundary vegetation or built form of Enfield to the east and south. Therefore, glimpsed views both into and out of the Sites are only afforded where gaps in the vegetation allow. The majority of short range views onto the Sites are from PRow passing through woodland to the south or alongside Whitewebbs Lane to the north. In both cases, the presence of mature trees and hedgerows limit views. Photographs taken from a number of viewpoints surrounding the Site are shown in Figure 5.

Due to the natural screening, the existing character of the Site and the proposed scale of Development, the potential effects of the Development are not considered to be significant in landscape or visual terms.



Potential effects on landscape character and visual amenity would vary during the construction stage dependent on the nature and timing of the works and would largely relate to the introduction of construction equipment, temporary lighting, compounds and site hoarding. There would also be physical changes to the surface landform and vegetation patterns within the Site due to the construction of the pitches and the implementation of the proposed structure. At the Site level, these changes would result in adverse effects that would gradually progress to the new built form of the completed Development. Beyond the Site, there would be no physical change to the landscape features, but the construction activity would be perceived locally, principally within local views. In comparison to existing views of the Site, the visibility of the construction activity would result in adverse effects, however these could be mitigated through good practice construction methods such as hoarding that would be implemented through adherence to a CEMP.

In the first year of operation, before new landscape planting has matured, the completed Development would result in a change in land use, with increased activity and movement in comparison to the existing disused golf course (although it will be similar to its previous use as an operational golf course pre-2021). These would be physical and perceived changes to the character of the Site and the local landscape character, along with possible changes to the character of the night sky, via new lighting. Whilst the extent of the change would be localised, adverse effects are predicted at the Site level and to close range visual receptors for the completed Development. By year 15, the proposed landscape planting would have established which would increase the vegetation cover across the Site and on Site boundaries. This would substantially reduce views into the Site and the perception of the change in land use from the Development, leading to reductions in the magnitude of the likely adverse landscape and visual impacts.

The proposed Landscape Strategy for the Site will create a cohesive and high quality setting to the new training centre, whilst also providing a variety of ecological enhancements to the wider landscape setting. These proposals are split into five landscape character areas:

1. New woodland areas - new areas of diverse, native woodland linking habitats within adjacent Whitewebbs Wood and Dickenson's Meadow.
2. Training Centre – aiming to provide an attractive setting to new training facilities including extensive new tree and woodland planting providing enhanced screening, helping to assimilate new built form into the wider landscape.
3. Existing Whitewebbs Wood - management of the part of Whitewebbs Wood that falls within the Site boundary to enhance the biodiversity and amenity value of the existing woodland. Management informed by outline guidance within Appendix C of Enfield's Blue and Green Strategy (2021-2031).
4. Historic Parkland - existing golf course to be restored into expansive parkland setting with extensive new tree planting, referencing the historic landscape pattern.



5. Setting to café and visitor centre - creation of an attractive and high quality landscape setting to the new public café and visitor centre with enhanced car parking.

Further consideration of the setting of the Development and views to and from the Site will be provided in the Landscape and Visual Impact Assessment that accompanies the planning application.

## **i. Biodiversity and Arboriculture**

The Site partially overlaps with Whitewebbs Wood Site of Importance for Nature Conservation (SINC), which is of Metropolitan importance and designated for ancient woodland, notable flora, breeding avifauna and great crested newt. Forty Hall Park Estate SINC (Metropolitan importance) lies adjacent to the eastern boundary of the Site and supports a range of notable habitats (hedgerows, secondary woodland, veteran trees) and a range of legally protected and notable species including stag beetle. A further SINC, Hilly Fields Country Park lies close to the southern boundary of the Site on the other side of Clay Hill.

The closest statutory ecologically designated Sites are the Lee Valley SPA and Ramsar Site (at the closest point this is underpinned by the Turnford to Cheshunt Pits SSSI) approximately 3.6km north east of the Site boundary and the Chingford Reservoirs (SSSI) approximately 4.5km east of the Site boundary.

Whitewebbs Wood is listed on the Ancient Woodland Inventory; with areas of both Ancient and Semi-natural Woodland (ASNW) and Plantation on Ancient Woodland Sites (PAWS) present within the boundary. These woodlands also qualify as Habitats of Principal Importance (also known as Priority Habitats). The Site is known to support a range of legally protected and notable species including great crested newt, marsh tit and stag beetle.

A Site walkover for a Preliminary Ecological Appraisal (PEA) Assessment was undertaken in July 2022, with updated survey information gathered in late March 2023 (see Figure 4, Annex 1). The former golf course is dominated by modified grassland, with stands of native and non-native tree planting of varying quality, ditches, ponds and a river. The woodland includes mature stands, with fringing habitats including scrub and semi-improved grassland. The habitats provide a range of opportunities for biodiversity, with wide scope for enhancement. Whilst the modified grassland and lower quality tree planting provide scope to develop several areas whilst keeping historic / better quality tree cover largely intact.

During the initial walkover of the Site, there was no direct evidence of protected species observed. However further protected species surveys including for Otter, Water Vole, Badger, Reptile and Bat surveys will be carried out in support of the planning application and will be included in the EclA report. If evidence of protected species is found, translocation or clearance will be undertaken in accordance with the necessary legislative and/or licensing procedures in advance of construction works.

There are many high quality trees over the Site, both individuals and collectively in groups or woodland. Most notably, the woodland in the north-west corner is Ancient or Ancient replanted, while there are several historic and veteran trees scattered over the former golf course. However, these are interspersed with lower quality tree cover, giving scope to develop several areas whilst keeping the





historic tree cover largely intact. During construction a number of trees would be lost to development, with these being largely restricted to those planted within the former golf course. The other main habitat that would be reduced in extent is modified grassland. Works to improve current access through areas of Ancient Woodland would be carried out in areas that were previously disturbed by construction (e.g. during installation of the access, delivery of utilities etc.) thereby avoiding impacts on ancient woodland soils.

Appropriate measures will be adopted during the construction phase to limit the occurrence of adverse effects on any sensitive ecological receptors, including noise, dust and lighting effects. These will be set out in the CEMP. Consequently, through habitat retention, enhancement and creation, and the implementation of a CEMP it is not anticipated that the Development will result in significant adverse ecological effects.

The design strategy seeks to retain habitats of highest importance, with enhancement of retained areas providing Biodiversity Net Gain (BNG). The Site provides opportunities for the creation of more diverse grassland, additional wetland features, new tree planting (including as woodland and parkland trees) and enhancement of existing woodland. Opportunities will be provided for invertebrates including bee banks (created from old golf course bunkers), dead wood habitats (specifically to attract stag beetle), wetland features with wide drawdown zones and specific food plants for butterflies.

Potential pathways for significant effects to the designated Sites are considered to be limited to air quality effects associated with increased traffic from the completed Development, in particular atmospheric nitrogen deposition that has been identified as a threat for qualifying features. However, the number of estimated vehicle trips for the Development are expected to be relatively low (see '*Transport and Access*' section above) and EV parking provision would be provided in accordance with local policy. A Travel Plan will also be developed to provide measures that manage potential traffic-related effects. Furthermore, an external lighting strategy will be developed to minimise light spill on sensitive habitats and species on and surrounding the Site.

As compensation for the proposed tree loss on Site, approximately 3,000 new trees are proposed to be planted to enhance existing parkland and establish new woodland areas.

It is not anticipated that there would be significant negative effects on ecology and biodiversity during operation. Suitable design mitigation will be embedded into the Development, informed by habitat or species surveys as required, including the retention and enhancement of native woodland through a detailed landscaping strategy and implementation of a sensitive external lighting strategy.

The application would be supported by a PEA, EclA, Phase 2 Species Survey Reports and an Arboricultural Impact Assessment.

## **j. Microclimate**

The Development will retain but modify the existing buildings on Site without significantly changing the building massing. The proposed scale and height of the Development would not generate wind effects within the Site and the surrounding area. Furthermore, no adverse daylight, sunlight and



overshadowing effects are predicted from these structures. On this basis, it is assumed that the Development is not likely to give rise to significant effects.

#### **k. Light Pollution, Sky Glow and Glare**

Two of the pitches are expected to be floodlit; however, no use of floodlights will be permitted after 8.30pm on any day and no likely significant effects are expected. The Site is not located in Dark Night Skies Zone. The external lighting strategy, including floodlighting strategy, is being developed in accordance with ILP Guidance<sup>8</sup>, to minimise sky glare and light spill outside the Site boundary, notably on sensitive ecological habitats. This will inform an external lighting assessment, to be submitted with the planning application, that will outline the proposed lighting strategy, including specific design considerations to minimise light spill and glare, and demonstrate how it meets policy requirements.

Cladding and glazing details for the design proposals are currently unconfirmed, but they will not have a significant reflective value and consideration of solar glare will be incorporated within ongoing design development to ensure that road users along Whitewebbs Road/ Whitewebbs Lane remain unaffected by the completed Development. Subject to confirmation upon design completion, significant solar glare effects are anticipated to be unlikely. A summary of solar glare effects and design response will be provided within the planning application.

#### **l. Risk of Major Accidents and Disasters**

There are no Control of Major Accidents Hazards (COMAH) registered activities within or close to the Site. Construction of the Development will be undertaken in accordance with current health and safety regulations and guidance to minimise the risk of accidents. The operation of the Development will not include the use of particularly hazardous substances or technologies, and therefore the risk of a major accidents or disaster is not considered to be significant.

#### **m. Risk to Human Health**

The most significant risks to human health relate to poor ambient air quality and noise conditions. As set out above, these issues are capable of being addressed during construction works through standard mitigation measures as part of the CEMP that will likely be conditioned for this Development and, for the completed Development, through design. The Development is not expected to introduce any activities that would affect the health of the local population and the Training Academy and public access improvements is expected to provide wider health benefits to the local community. Overall, the Development is not considered likely to give rise to significant effects.

The planning application will be supported by a Health Impact Assessment.

#### **n. Climate Change**

It is not considered that the Development will give rise to significant emissions of greenhouse gases due to its scale, as there would be relatively little uplift in road traffic associated with the Site and EV provision would be provided in accordance with LB of Enfield policy and guidance. The Development

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<sup>8</sup> Institute of Lighting Professionals (ILP) guidance GN01:2011 Guidance Notes for the Reduction of Obtrusive Light



will incorporate appropriate climate change adaptation measures designed to address the potential risks associated with climate change, including allowance for storm events in drainage design, use of durable materials, solar shading and glazing to avoid overheating, and renewable energy generation. Overall, no significant increases in greenhouse gas emissions are anticipated as a result of the Development and it is therefore not considered that the Development would have significant effects on climate change.

A Sustainability and Energy Statement and Whole Life Carbon and Circular Economy statement will be prepared to accompany the future planning application for the Site.

### **Cumulation with Other Development**

A search was undertaken of other approved development schemes (known as 'Cumulative Schemes') based on their proximity to the Site as well as their scale and massing. The only cumulative scheme identified is adjacent to the Site and was submitted by the Applicant:

- Land to the South of Whitewebbs Lane & West of Hotspur Way Enfield EN2 9AP (ref: 17/01178/FUL): *Formation of outdoor educational facility comprising ground works to form a nature reserve/ecological enhanced area together with erection of a single storey detached building with basement for education, sports and leisure uses, a 4-pitch Multi Use Sports Pitch with spectator stands and floodlighting, associated car parking and ancillary works.*

The above consent (known as the "Western Field") would be modified alongside the forthcoming application to deliver the operational link between the existing and proposed training facilities.

When considered in cumulation with the other approved development above (also referred to as 'Spurs Environmental Centre & Nature Reserve'), the Development would deliver local community and health benefits, although the effects are unlikely to be significant.

Potential cumulative effects during construction would be of a temporary nature and managed to an acceptable level through standard widely applied good practice environmental management measures as part of a CEMP for each scheme. Significant cumulative effects related to construction would therefore not occur.