

Sandra Tyler
Hon. Secretary,
Friends of Whitewebbs Park

whitewebbspark@gmail.com

David Knowles

Public & Community Relations Manager

Tottenham Hotspur Football & Athletic Co Ltd

Lilywhite House, 782 High Road, London N17 0BX

8th March 2024

Dear Mr Knowles,

Response to THFC Proposals for Whitewebbs Park

Thank you for providing the Friends of Whitewebbs Park (FOWW) with the online version of your update to your proposals for Whitewebbs Park. We have, individually, received printed copies through your distribution system.

As we have made clear FOWW is opposed to the proposal that THFC should be leasing the park. The recent survey of 750 park users which we conducted in November 2023 supported this position. Full details of the survey can be found on www.whitewebbspark.org.uk

As you are aware our Chair, Sean Wilkinson, has undertaken legal action in a personal capacity to oppose Enfield Council's action through the Judicial Review Process which has not yet concluded.

There are several points arising from your publication that, as FOWW, we would ask you to respond to and these are set out clearly as follows.

1. "We undertook a detailed and comprehensive public consultation..."

This 'detailed consultation' took the form of an exhibition held in a location with no public transport, well away from the populated areas of Enfield. The room was too small for the number of attendees which made the viewing of plans and interaction with the Tottenham representatives difficult. The online webinar was attended by only 20 people.

The exhibition and webinars did not constitute a detailed consultation; it was very limited. You state that you had "spoken with 430 residents and Key Stakeholders". Out of the 430 people only 110 provided written feedback. FOWW surveyed over 750 park users in November 2023 with full written feedback. The results were advertised and published in full (www.whitewebbspark.org.uk) together with the hundreds of freeform comments. There was a 94% rejection of the proposal that THFC should lease and manage the park.

Question 1

In a spirit of openness,

Please publish the full results of your survey, including the comments on the survey forms (anonymised of course).

Please define who the “Key Stakeholders” are (as the Council did in its Marketing updates) and which “community representatives” attended these 12 meetings.

2. “Regularly visited and spoken to residents at the Southern café... organised a drop-in for local groups, which 11 community representatives attended”

Those of us who are daily visitors to the café have no recollection of meeting Spurs representatives so how are these ‘visits’ evidenced?

Furthermore, this statement implies that 11 community groups took part in the drop-in whereas most of the representatives were from FOWW with Enfield RoadWatch and the Enfield Society.

Question 2

Please tell us which other community groups were represented.

3. “Community Liaison Group”

Meaningful communication (or rather the woeful lack of it), either from Enfield Council or THFC has been the most disturbing and dire feature of this whole ‘consultation’ process. Our experience as park users of the ‘consultation’ process so far has given us little faith in the promise of receiving full transparency around engagement, liaison, dialogue, consultation, or communication.

Question 3

Communication is a two-way process, not dominated by one element and registering for a nebulous Community Liaison Group indicates that THFC will be controlling admission to this group. It would be helpful if you were to provide a detailed model for your proposed Community Liaison Group.

4. “The Training Centre and Academy would only take up a relatively small part of the original bid site”

THFC **claims to want just 18%** for their football facility but they have bid for about 60% of the park including all the access points (bidders were not required to bid for the whole park). The fact that THFC has bid for 140 acres, not just the 40 acres it “needs” indicates a more extensive long term strategic agenda). The football facility will occupy about **40% of the open parkland space** and if successful, THFC will manage and develop all the open parkland space. Crucially, however, they have no experience of managing public open space.

Question 4

Why is THFC bidding for all the open space, about 10 acres of ancient woodland and about 4 acres of the more formal parkland when it only “needs” 40 acres for its training facility?

Will THFC commit itself to not reducing the publicly accessible area throughout the course of the lease?

5. “Provide new community space”

The Council has looked to short term inadequate solutions for decades; a café in this park is an attractive commercial proposition to many potential providers subject to the Council making proper lease arrangements. With an appropriate and businesslike approach from the Council this community facility could be provided without THFC taking over the park. A café and community facilities would be a self-financing and profit generating enterprise. Even the current inadequate and limited facilities have generated a large and loyal following.

In relation to the statement above, the following has been gleaned from your current community space proposals. You propose:

1. A very confused and ill-defined promise of enhanced access (we can provide full details of our concerns if required).
2. Loss of public open spaces sited in greenbelt land.

3. Planting 3000 trees that are not needed (nature is dealing with this quite efficiently and adequately).
4. A dog washing tap.
5. The restoration of a Conduit House.
6. Loss of carparking in the North of the Park
7. A notice board

Question 5

So, can you be clear precisely what is THFC offering to the WHOLE community of park users and not just the elite few who will have access to the football academy?

What is the schedule of works?

Could we have sight of the Estate Management Agreement, draft or otherwise?

6. “Protect and significantly improve biodiversity “

Within Greater London and the UK there has been a massive loss of habitats of all types over the last century. The greatest losses are wildflower meadows and low intensity grasslands, experiencing a 98% decline. THFC’s proposal will see 15+ hectares of mixed grasslands replaced by manicured turf and astroturf. These are biodiverse areas supporting a wide variety of insects, plants, reptiles, and mammals. They are the feeding grounds for birds, bats, butterflies, and bees. Adding a few bird and bat boxes will not compensate for this loss. The planting of 3,000 trees across the site will lead to further loss of grassland habitats. Natural processes are leading to many new healthy trees on the former golf course.

Question 6

Surely, the only possible reason for wanting to plant 3,000 new trees is to hide the impact on the landscape of your pitches and supporting infrastructure. What is the ecological rationale for planting 3000 more trees?

Excluding the training area there are about 20 hectares of open, non-wooded , space in your planned demise. This would indicate an average of 150 trees per hectare. The National Forest suggests that parkland should have 5 to 25 mature trees per hectare. 150 mature trees per hectare would be solid woodland.

The proposal in the publication makes no mention of the green corridor along the northern boundary of your demise, nor is it shown on the maps, so has this been abandoned?

7. “Controlling non native species within the woodland”.

The ancient woodland consists largely of Oak, Hornbeam and Holly with some beech and silver birch all native. Which non native species will you be controlling in the woodland?

You claim to be restoring 19th century parkland. As well as native species some non native species were characteristically featured in such a landscape. Which do you intend removing and why

Question 7

The principal non native species in the park is the Himalayan Balsam along much of Cuffley Brook, choking it in summer. What plans do you have for controlling this?

8. “Enhance access to nature”

This document does nothing to provide clarification around how or which paths will be enhanced, maintained, or paid for and, in fact, it adds to the confusion. At the ‘consultation’ exhibition in November 2023 it was **impossible to find any accurate information on your proposals** for footpaths, bridleways and access, their maintenance, and the associated financial arrangements.

Reference is also made to an **Estate Management Agreement** yet no details of this are available. You do state that the woodland will be managed by the Council yet references within the current document suggest that the Estate Management Plan will cover the whole park including the woodland.

The accidental publication last year of a document produced by THFC in 2020 gives rise for some concern. It mapped out a plan for managing the whole park and indicated that several named consultancies were already involved as were several other named organisations. Much of the document related to management of the woodland and park for Biodiversity Net Gain credits. However, your colleagues did not admit to any knowledge of such document. It does, however, bear resemblance to an Estate Management Plan for the whole of Whitewebbs in partnership with Enfield Council and others, with THFC taking a leading role.

Question 8

In the spirit of ‘openness creates trust’ we would welcome a full and open account of your ideas on the Estate Management Plan at this stage.

Please provide clear and detailed maps which show all paths which will be enhanced and maintained by THFC and include any paths outside the leased area which will be enhanced along with unambiguous details of the source of funding for the works outside the leased area.

Please let us have an authoritative statement as to the status and current relevance of the document dated 2nd March 2020.

9. Restoration of built features

The driveway to the Toby Carvery

With the anticipated traffic for the Carvery (av. 290 per day- EIA figures)) this proposed change to the driveway will disturb a very peaceful and much loved part of the formal gardens around the lake. At some points the driveway is just 5 yards from the lake edge, close to nesting areas for birds and waterfowl.

At present traffic to the Carvery is well away from the lake but in future there will be traffic on both the existing road and this driveway. There will be some risk to pedestrian enjoyment of the lakeside area and to birdlife.

The term “Historic” is inappropriate, it is just a 19th Century driveway of no architectural or cultural significance.

Question 9a

How do you propose to address or mitigate these issues outlined above?

Purchase of North Lodge

As this property sits outside the area you of the proposed lease, we would like to understand why THFC have purchased this property at what will be the main entrance to the northern park.

Question 9b

Why do THFC need the North Lodge and what is the proposed purpose of this building in the future?

The Restoration of Conduit House

While welcoming the restoration of any item of real historic importance we believe that you have ignored a far more significant feature of the park.

Your proposals make no mention of the **Old Course of the New River**. This is clearly visible and follows the 100-foot contour line in an East – West loop across the southern part of the park. As a piece of remarkable early 17th Century engineering this is a truly historic feature. It encompasses aspects of London’s history, engineering achievement and industrial archaeology and we are surprised that you have overlooked it.

Question 9c

Why hasn’t this been acknowledged or featured in the proposal?

Miscellaneous points

When the map on P 2 was enlarged it would seem that it should be possible to walk around the new training ground albeit along a narrow corridor on the Eastern side. Is this so? To the East of the new training area there is a loop that looks like a Scalextric track, what is this? There is something similar within the training area.

Question 9d

Can you address these two points in relation to access to the training ground and the loop referenced above?

Pitches

Please confirm that all the grass pitches will be permanently just grass not “hybrid”.

Relating to your statement that “we can offer more training time for community and local schools” and so that the local community has a clear idea of what to expect from this facility can you answer the following questions:

Question 9e

- a. How many primary schools will have access to this football facility?***
- b. How many hours of playing time can each of these schools expect to be allocated annually?***
- c. How many secondary schools will have access to this football facility?***
- d. How many hours of playing time can each of these schools expect to be allocated annually?***
- e. How many community teams will have access to this football facility?***
- f. How many hours of playing time can each of these teams expect to be allocated annually?***

We all know that school budgets are very stretched. What financial arrangements will be made to enable schools and community teams to travel to the facility?

“Wider Community benefits”

The claims in your document are not supported by statements from your consultants Quod in their recent EIA (Environmental Impact Assessment) application for your Whitewebbs proposal.

Question 9f

We would appreciate your views on why Quod do not support the claims in relation to this.

“Create new jobs and opportunities”

“Whilst the effects will be beneficial, in the context of existing district and regional employment levels, these effects are not likely to be significant.”*

Please provide details of the strategic or the people plan outlining how the proposal, if successful, will be creating new jobs and opportunities for the local community as well as wide context of regional employment.

Question 9g

For example, how many new jobs will the proposal create?

“Importantly, the Academy will contribute to one of the Councils five strategic priorities – that of creating a strong healthy community”

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

Presumably there are some key indicators within this objective in terms of ‘creating a strong healthy community’.

Question 9h

Can you explain which indicators this proposal plans to address in order to contribute to the borough's strategic plan?

The Friends of Whitewebbs would be grateful for full and prompt replies to the above questions. We will publish your responses in our Newsletter which goes out to over 400 people. The Spring edition will be published towards the end of this month.

Yours sincerely

Sandra Tyler

Hon. Secretary Friends of Whitewebbs Park

* Email: lewis.jenkins@quod.com Date: 6 October 2023

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

ANNEX 2

EIA Screening Appraisal: Former Whitewebbs Park Golf Course, Enfield

Section D Socio-economics P22 and Cumulation with Other Development P35